

# **Pembrokeshire Coast National Park**

## **Local Development Plan**

**(end date-2021)**

Adopted Plan

Finalised Sustainability Appraisal Report

**PEMBROKESHIRE COAST NATIONAL PARK AUTHORITY**

**September 2010**

## Contents

<b>1 Summary and key outcomes</b> .....	<b>2</b>
<b>2 Appraisal Method</b> .....	<b>5</b>
<b>3 Background</b> .....	<b>9</b>
<b>4 Sustainability context, baseline &amp; objectives</b> .....	<b>14</b>
Other relevant policies, plans and programmes.....	14
Social, environmental and economic baseline .....	19
Likely changes in the environmental, social and economic context in the absence of the Plans.....	19
Sustainability Issues.....	24
Sustainability Objectives.....	30
<b>5 Sustainability Appraisal of the Plans' Vision, Objectives and Policy Options</b> .....	<b>32</b>
Vision .....	32
The Vision for the Pembrokeshire Coast National Park as included in the Deposit Local Development Plan .....	32
Summary of the Sustainability Appraisal of the Vision.....	33
Compatibility of Plan objectives and Sustainability Objectives .....	33
Appraisal of Local Development Plan policies .....	40
Assessing the cumulative impacts of Plan policies.....	96
Sustainability Appraisal of Local Development Plan Allocations .....	102
<b>6 Implementation</b> .....	<b>111</b>
Monitoring the sustainability impacts of the Plans .....	111
<b>8 References and further information</b> .....	<b>114</b>

## 1 Summary and key outcomes

### Context

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

### Sustainability Objectives

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

- i. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.
- ii. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.
- iii. Conserve and enhance landscapes, townscapes and seascapes, and all their components (including the built environment and archaeology) with reference to the special qualities of the National Park.
- iv. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.
- v. Increase the number of visitors using the National Park outside the peak visitor season.
- vi. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.
- vii. Reduce factors contributing to climate change.
- viii. Maximise the contribution of the limited opportunities for development to sustaining local communities.
- ix. Encourage access for all to the National Park, reflecting the social mix of society.
- x. Maintain the cultural distinctiveness of communities.
- xi. The adverse effects of minerals exploitation in the National Park decline from the present level and the potential biodiversity and landscape gains of former minerals sites are realised.
- xii. Reduce the negative impacts of waste.

- xiii. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population
- xiv. Maintain and enhance biodiversity both within and outside designated sites
- xv. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.

1.3 More information on the development of the Sustainability Objectives is included in section 4

### **What would happen in the absence of the Local Development Plan**

1.4 Guidance on Sustainability Appraisal and the Strategic Environmental Assessment Directive require that the likely evolution of the Plan area in the absence of the Plan is considered. Many of the Sustainability Objectives for the National Park are subject in large part to policy and activity beyond the remit of the Local Development Plan. Having said that, in the absence of the Local Development Plan, it is unlikely that the area will progress as far towards the desired sustainability goals; and sustainability outcomes, particularly in the context of a National Park become increasingly uncertain as the current Development Plan reaches the end of its duration (see section 4).

### **Appraisal of Local Development Plan Objectives and Policies**

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

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

1.7 Sustainability Appraisal has been part of the process for creating the Local Development Plan from the start and because of this most policies are, by this stage, as sustainable as they can be. The opportunities for improvement identified were:

- Review the wording of policy 6 (countryside), as it suggests development would not be strictly controlled if the subsequent criteria were met.
- In Policy 22 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.
- Consider rewording the final paragraph of policy 44 (telecommunications) as it is already likely that the sites proposed for masts have been identified as the most suitable.
- Policy 47 (Local Sites of Nature Conservation Interest) or its reasoned justification could give some indication of how the relative importance of a development and a nature conservation site will be judged.
- Clause b of policy 48 (protection of biodiversity) should be deleted as relocation is often unsuccessful, and protection of a site for wildlife is likely to be the most appropriate conservation measure.

### **What will be the cumulative impacts of the Plans' proposals**

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

### **Sustainability Appraisal of Local Development Plan development allocations**

1.9 Part of the evaluation framework for potential development allocation sites was assessment of the sites against the Sustainability Objectives. Of 72 sites that reached this stage of the evaluation 3 were rejected as a consequence of the Sustainability Appraisal and 69 were regarded as appropriate in sustainability terms and progressed to the next stage.

### **How will other Plans impact?**

1.10 Other Plans are also likely to influence the effects of the Pembrokeshire Coast National Park Local Development Plan. Most notable of these are the Wales Spatial Plan, and the Development Plans for Pembrokeshire, Ceredigion and Carmarthenshire. The Sustainability Appraisal of the Wales Spatial Plan identified mitigation measures to ensure that any negative effects of the spatial strategy are minimised or avoided and these are incorporated into the Local Development Plan. Potential impacts and combination effects of neighbouring Authorities' Plans have been addressed by considering development allocations in the context of neighbouring Authorities' allocations. A further key interaction with neighbouring Authorities concerns the complementarity of their nature, the National Park as a key area for recreation, and neighbouring areas providing more housing and employment opportunities.

## 2 Appraisal Method

- 2.1 In the context of Local Development Plans, the Welsh Assembly Government sees the requirement for Strategic Environmental Appraisal being met as part of a wider Sustainability Appraisal (SA) that includes economic and social considerations. The early stages of production of the Pembrokeshire Coast National Park Local Development Plan were undertaken in tandem with the production of the Pembrokeshire Coast National Park Management Plan. The Countryside Council for Wales' guidance National Park Management Plan preparation advises an integrated approach to Sustainability Appraisal when Management Plans and Local Development Plans are in preparation at the same time (as is the case in the Pembrokeshire Coast National Park).
- 2.2 Therefore a Sustainability Appraisal that incorporates a Strategic Environmental Assessment has been integrated into the development process for the Management Plan and the Local Development Plan. As the Plans share objectives and drew their policy options from a common set of options, a single Sustainability Appraisal to cover the Management Plan and Local Development Plan Preferred Strategy was undertaken. The Local Development Plan Preferred Strategy has been developed into the Deposit version of the Local Development Plan and the Sustainability Appraisal continued to appraise the detailed policies of the Local Development Plan. The appraisal of the Deposit version of the Local Development Plan is reported here.

### Components of the Sustainability Appraisal

- 2.3 The stages to Sustainability Appraisal are as follows:
- i. Scoping - setting the context and objectives, establishing the baseline and deciding on the scope;
  - ii. Assess the Management Plan and Local Development Plan (Preferred Strategy) strategic options against the Sustainability Objectives and produce Sustainability Appraisal Report;
  - iii. Assess the Deposit Local Development Plan policies against the Sustainability Objectives and produce Sustainability Appraisal Report;
  - iv. Produce a Sustainability Statement stating how the findings of the Sustainability Appraisal have been taken into account in the final Plan
- 2.4 The first, scoping, stage was completed in March 2007. The completed scoping report can be obtained from the offices of the Pembrokeshire Coast National Park Authority, or from its web site, [www.pembrokeshirecoast.org.uk](http://www.pembrokeshirecoast.org.uk). The key findings of the scoping process, the sustainability issues and the Sustainability Objectives against which the Management Plan and Local Development Plan were appraised, are included in this report.
- 2.5 The second stage was carried out between March and November 2007 during the process of developing the objectives and policy options for the Management Plan and Local Development Plan Preferred Strategy. A draft report of this process was prepared for consultation between February and April 2008. The final report of this process can be obtained from the offices of the Pembrokeshire Coast National Park Authority, or from its web site, [www.pembrokeshirecoast.org.uk](http://www.pembrokeshirecoast.org.uk).
- 2.6 The third stage, appraisal of the detailed policies of the Local Development Plan was

carried out between September and November 2008. This is the report of that appraisal.

- 2.7 A full timetable for the Management Plan and Local Development Plan processes can be found in the Delivery Agreement.
- 2.8 The Sustainability Appraisal is being undertaken internally by officers of the National Park Authority as part of the Plan making process. Officers of the Countryside Council for Wales have provided advice throughout the process.
- 2.9 The policies in the Deposit Local Development Plan have in large part been developed from the preferred policy options considered for the Local Development Plan Preferred Strategy. For policies that have emerged directly from one or several policy options considered for the Preferred Strategy the conclusions reached then have been brought into this document to form the detailed appraisal included in Appendix A. For policies that differ from the Preferred Strategy policy option that gave rise to them, or policies added since the Preferred Strategy, a detailed appraisal has been undertaken. These detailed appraisals followed the same method as that for the policy options considered for the Preferred Strategy. Each policy was considered against each of the 15 Sustainability Objectives. The assessment matrices for these Policies are also presented in Appendix A. When a Policy has arisen from the preferred option from a set of alternative options, the Sustainability Appraisal of these options for each Deposit Plans Policy is shown in summary in Appendix D and in detail in Appendix E.
- 2.10 The Strategic Environmental Assessment directive requires that authorities *'which, by reason of their specific environmental responsibilities, are likely to be concerned by the environmental effects of implementing plans and programmes'* be consulted on the scoping process of the assessment. European Union member states are required to identify such authorities as designated consultation bodies. In Wales the designated consultation bodies are the Countryside Council for Wales, the Environment Agency, and Cadw. The National Park Authority has also identified a number of public bodies and non-governmental organisations whose contributions on the Sustainability Appraisal should be actively sought, these bodies comprise those members of the External Sustainability Appraisal Group (other than the designated consultation bodies) listed in the Delivery Agreement for the National Park Management Plan and Local Development Plan.
- 2.11 The designated consultation bodies, external sustainability appraisal group and the public were consulted on the scoping report for the Sustainability Appraisal between 18 October 2006 and 29 November 2006, and the Sustainability Appraisal of the Local Development Plan Preferred Strategy between 25 February 2008 and 7 April 2008, and the Sustainability Appraisal of the Deposit Local Development Plan between 11 March 2009 and 22 April 2009. The reports of these consultations and the final scoping report can be viewed on the Pembrokeshire Coast National Park Authority web site.
- 2.12 The Strategic Environmental Assessment directive requires that the designated consultation bodies and the public be consulted on the environmental report. This report of the Sustainability Appraisal is that Environmental Report.
- 2.13 The principle difficulty in carrying out the Sustainability Appraisal has been the lack of information and understanding of many of the issues of interest, combined with large volumes of information and data for others. The problems associated with lack of information are clear, but too much information is also a problem for Sustainability Appraisal as the time and resources are not available to find, process and evaluate the information to ensure that the best information is included in the appraisal.
- 2.14 The problem of lack of relevant information is further aggravated in National Parks as the geography at which much information and data are published does not match or nest within the National Park. This means that information used in the Sustainability

Appraisal often refers to the Local Authority area of which the National Park is a part, even though it may not always be appropriate to assume that the two areas are equivalent with regard to the data or information in question.

2.15 The lack of quality information on all issues for the National Park area carries with it two key risks for the Sustainability Appraisal:

- i. it will not be possible to confidently predict the impacts of the Plans in all cases, and may not be possible to accurately monitor the effects of implementing the Plans;
- ii. what is measured, or easily measurable, will define what is important in the Sustainability Appraisal. In other words, issues for which no good evidence exists become less important, or even fail to feature, in the Sustainability Appraisal, even when the majority of stakeholders would agree they are real and important.

2.16 The Pembrokeshire Coast National Park Authority has attempted to deal with the second risk by consulting external organisations and officers of the Authority in order to identify sustainability issues, as well as identifying issues emerging from the baseline information gathered. The first risk is more difficult to deal with as it will require changes in the geographies at which data and information are disseminated, which may not always be possible due to risk of disclosure of personal and sensitive information, or because the data may not be statistically valid for small areas; or will require new data gathering systems and projects, which are likely to involve substantial resources.

2.17 During the appraisal it became clear there was some difficulty relating to the interpretation of two of the Sustainability Objectives:

- i. Sustainability Objective 9: Encourage access for all to the National Park, reflecting the social mix of society.

This could be interpreted as promoting social inclusion amongst visitors to the National Park (i.e. attracting people from all sectors of society, regardless of (for example) ethnicity, disability or income). It could also be interpreted more widely to include not only visitors but also consider access to services and opportunities for residents of the National Park and adjacent areas. The latter interpretation has been followed for the Sustainability Appraisal.

- ii. Sustainability Objective 10: Maintain the cultural distinctiveness of communities.

This proved to be a difficult Sustainability Objective to use due to the ambiguity in the term 'cultural distinctiveness'. At one extreme it can be taken to mean the historic manifestation of culture - historic buildings and other features in the landscape, at the other extreme it is the current culture - values and ideas - of the people living in a community. With either interpretation, or any in between, this objective has risks. In adopting a historic approach maintaining cultural distinctiveness means to some extent defining a community by its history and forcing it to conform to, what may be now a defunct, imposed cultural identity. If a current ideas and values approach is taken, maintaining cultural distinctiveness will to some extent mean insulating communities from outside cultural influences. Either way maintaining cultural distinctiveness involves controlling the way people behave and express themselves in a way that is likely to go beyond the normal legislative and social restrictions of society.

The difficulties in interpreting this Sustainability Objective have been taken into account in the appraisal of Plan options, and the outcome against this



Sustainability Objective has not been allowed to affect the overall appraisal where the ambiguity could lead to different assessments.

In reviewing the Local Development Plan the Sustainability Objectives will also be reviewed. This objective will need careful consideration as to whether we want to retain it, what we want it to mean, and even whether cultural distinctiveness according to that meaning exists at all.

### 3 Background

- 3.1 Sustainability Appraisal is mandatory for Local Development Plans under the Planning and Compulsory Purchase Act, 2004. The purpose of Sustainability Appraisal is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of Local Development Plans
- 3.2 European Union Directive 2001/42/EC on "the Environmental Assessment of Plans and Programmes" requires that a Strategic Environmental Assessment (SEA) be carried out for land use plans and programmes likely to have a significant effect on the environment. The Pembrokeshire Coast National Park Local Development Plan is such a plan and is therefore subject to Strategic Environmental Assessment.
- 3.3 This report documents the Sustainability Appraisal and its incorporated Strategic Environmental Assessment .
- 3.4 The Local Development Plan is subject to National Park purposes:
- 'to conserve and enhance the natural beauty wildlife, and cultural heritage of the National Parks.'*
- 'to promote opportunities for the understanding and enjoyment of the special qualities [of the Parks] by the public.'*
- 3.5 These are underpinned by the Sandford Principle which asserts the primacy of the first purpose over the second in cases of obvious conflict. Reflecting that National Parks are cultural landscapes with a resident population, the Authority also has a duty in taking forward the park purposes to: *'foster the economic and social well-being of local communities, within the National Park....'*. This duty should be fulfilled in the pursuit of National Park purposes.
- 3.6 The Deposit Local Development Plan contains a vision for the National Park in 2021 (the end of the Plan period) and Objectives for key outcomes during the life of the Local Development Plan. The vision and objectives are derived from the common vision and objectives developed for the Management Plan and Local Development Plan Preferred Strategy. The vision contained in the Deposit Local Development Plan for the National park in 2021 is:

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.

3.7 The objectives for the Local Development Plan are:

### **National Park purposes, major development, the potential for growth**

#### Scale and Location of Growth

- To promote a spatial strategy that minimises the need to travel. When releasing the scarce land supply or considering the reuse of buildings in the National Park prioritise their use or reuse for development which contributes most to sustaining local communities.

#### Minerals

- No new mineral workings or extensions to existing mineral workings will be allowed within the National Park other than in exceptional circumstances.<sup>1</sup>

#### Waste

- To provide local waste facilities for National Park waste or secure facilities outside the National Park to deal with this waste.

#### Ministry of Defence

- No intensification of use or extension of Ministry of Defence sites will be allowed save in exceptional circumstances.<sup>2</sup>

### **Climate change, sustainable design, flooding, sustainable energy**

#### Pollution, Unstable Land and Contamination

- To minimise the creation of new sources of pollution and contamination and to address issues relating to the instability of land within the National Park.<sup>3</sup>

#### Renewable Energy

- To improve energy conservation and efficiency and to contribute to national targets for renewable energy.

#### Soil, Air and Water Quality

- To safeguard and enhance the soil, air and water quality of the National Park.<sup>4</sup>

#### Sustainable Design

---

<sup>1</sup> Minerals Planning Policy, Welsh Assembly Government, December 2000, paragraph 21

<sup>2</sup> Planning Policy Wales, Welsh Assembly Government, March 2002, paragraph 5.5.5 and 5.5.6

<sup>3</sup> Planning Policy Wales 2002, Welsh Assembly Government, Chapter 12 and 13.

<sup>4</sup> See previous footnote.

- The design of all development in the National Park reflects its special landscape and townscape qualities and local distinctiveness and meets the highest standards for resource use including minimising waste, and takes account of the impact of a changing climate

#### Coastal Management

- To avoid development of undeveloped and stretches of the coast at risk from flooding and/or erosion and to allow for any necessary adaptation by taking account of known and predicted climate change impacts on the coast.

#### Flooding

- To ensure development does not take place in locations where it may be at risk from flooding<sup>5</sup> or where it would increase the risk of flooding in another location.

### **Visitor economy, employment and rural diversification**

#### Employment

- Help to create and maintain a diverse viable and sustainable local economy benefiting all sections of the community.

#### Enjoyment

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

### **Affordable housing and housing growth**

#### Housing

- To aim to meet the housing needs, in particular, affordable housing needs of the National Park without compromising National Park purposes.

### **Community facilities**

#### Community Facilities

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

#### Retail

- To maintain a vital and viable retail sector at an appropriate scale and at appropriate locations throughout the National Park.

#### Transport

- To improve and promote accessibility by appropriate means and at appropriate times for the people who live, work, rest and play in the National Park whilst reducing the need to travel by private car.
- To ensure adequate provision of utilities for local communities and that this provision is compatible with the National Park designation and protection of its resources.

### **Special Qualities**

---

<sup>5</sup> 'At risk areas' are mapped by the Environment Agency weblink: <http://maps.environment-agency.gov.uk/wiyby/mapController> and information included in the relevant Shoreline Management Plan.

#### Historic Environment

- To conserve enhance and promote the historic environment of the National Park, its archaeological resource, historic buildings and landscapes, parks and gardens

#### Biodiversity and Geodiversity

- To conserve and enhance appropriate habitats and species within the National Park and to protect and promote the geological resource.

#### Landscape

- To conserve and enhance the special landscape character of the National Park.

#### Welsh Language and Culture

- To conserve and enhance the cultural richness of the National Park.

3.8 The Welsh Assembly Government has decided that for Development Plans the requirements of the Strategic Environmental Assessment Directive are best incorporated into a wider Sustainability Appraisal. The Strategic Environmental Assessment Directive has a number of requirements

- i. The preparation of an environmental report, the requirements of which are included in this report of the Sustainability Appraisal.
- ii. Consultation with authorities with environmental responsibility, and the wider public. This report is subject to a six week consultation period with Statutory Consultees for Strategic Environmental Assessment (the Countryside Council for Wales, the Environment Agency and Cadw) and the public. This consultation will occur at the same time as the consultation on the Deposit Local Development Plan.
- iii. That the environmental report and the results of consultation are taken into account in decision-making. The impact of the Sustainability Appraisal to date in shaping the Local Development Plan is documented in appendix E
- iv. Provision of information on the decision. This requirement will be met in the form of the published adopted plans, and in an environmental statement documenting how the Sustainability Appraisal has influenced the Plans to be produced once the plans have been adopted.
- v. Monitoring. The proposed sustainability monitoring framework is outlined in section 6 of this report.

3.9 The Strategic Environmental Assessment Directive requires assessment of the likely significant effects on the environment with regard to the issues in the table below. The Sustainability Objectives that cover each Strategic Environmental Appraisal issue are shown.

<b>Strategic Environmental Assessment Directive issue</b>	<b>Sustainability Objective(s)#</b>
Biodiversity	1; 6; 11; 14
Population*	2; 6; 8; 10; 13; 15
Human health	2; 4; 6; 9; 12; 13; 15
Fauna	1; 6; 11; 14
Flora	1; 6; 11; 14
Soil	1
Water	1; 12; 15

Air	2; 7
Climatic factors	2; 6; 7
Material assets*	3; 6; 13; 15
Cultural heritage (including architectural & archaeological heritage)	1; 3; 8; 10
Landscape	1; 3; 11; 12; 14; 15

\* These terms are not clearly defined in the Directive. 'Population' is taken to mean the demography and quality of life; 'Material assets' is taken to mean resources and infrastructure.

# See paragraphs 4.33 to 4.35 for the Sustainability Objectives.

### Other relevant policies, plans and programmes

4.1 The key Plans that will affect the context and implementation of the Pembrokeshire Coast Local Development Plan are the Wales Spatial Plan and the Development Plans of neighbouring Local Authorities<sup>6</sup>. The significant elements of the Local Development Plan's interaction with these Plans and the way the implications of these interactions are taken into account is discussed in some detail in this section. There are many other Policies, Plans and Programmes that have informed the development of the Plans, or parts thereof, these are documented in Appendix B.

### The Wales Spatial Plan

- 4.2 The preferred policy options for the Pembrokeshire Coast National Park Local Development Plan Preferred Strategy adopt the key settlement hierarchy set out in the Wales Spatial Plan Pembrokeshire Haven Key Settlement Framework 2021.
- 4.3 The Sustainability Appraisal of the Wales Spatial Plan<sup>7</sup> identifies a number of overall mitigation measures to ensure that any negative impacts of the Key Settlement Hierarchy are minimised or avoided, and the potential benefits are maximised in the Pembrokeshire - Havens Wales Spatial Plan area. These are:
- i. Ensure brownfield land use is maximised;
  - ii. Ensure service and employment centres are well served by public transport and non-motorised transport networks;
  - iii. Consider development of an incentive scheme for public transport users;
  - iv. Encourage higher density, mixed use development and co-location of housing and employment wherever possible;
  - v. Consider development of design guidance to ensure developments reflect local character and distinctiveness;
  - vi. Ensure commitment to meet BREEAM 'very good' or 'excellent' standards (to ensure energy efficiency through design and operation; reuse of existing façades, structures, materials; provision of waste recycling facilities, etc.);
  - vii. Ensure that sustainable construction techniques are employed in all new development;
  - viii. Ensure that new development is sited to minimise exacerbation of flood risk, particularly from run-off;
  - ix. Promote the use of Sustainable Urban Drainage Systems where appropriate.

---

<sup>6</sup> Pembrokeshire, Carmarthenshire & Ceredigion.

<sup>7</sup> Support for the SA/SEA of the Wales Spatial Plan Update. Swansea Bay, Pembrokeshire and South East Wales Area Actions. May 2007. Final Report Volume 1: Main report. Produced by ATKINS for the Welsh Assembly Government.

- 4.4 There are further, more detailed, mitigation measures, considered under specific topic areas (economy; housing; environment; transport; town centre redevelopment; energy; and tourism). For the most part these are contained within the overall measures listed above, though some extend the scope of these measures:
- i. Measures relating to transport infrastructure consider access to tourism/recreation destinations as well as to developments.
  - ii. Design and siting of development takes into account the impact on the whole landscape, not just the character of the built environment, and a comprehensive landscape character assessment be used to underpin landscape conservation & management.
  - iii. Habitat creation (e.g. tree planting and green roofs) is considered as part of a sustainable design approach
- 4.5 Additionally from the more detailed measures emerges another overall mitigation measure:
- i. Development and other activity (tourism/recreation) avoids damage, fragmentation, and loss of connectivity of wildlife habitats, and damage during development work should be avoided through appropriate timing and control of processes.
- 4.6 The following paragraphs review how the policies in the Pembrokeshire Coast National Park Local Development Plan may implement the mitigation measures for the Key Settlement Hierarchy adopted from the Wales Spatial Plan.

#### **Ensure brownfield land use is maximised**

- 4.7 Policy options to protect the landscape and townscapes of the National Park are likely to result in preferential development of brownfield sites (largely by reducing the potential for development on greenfield sites). The criteria for identifying potential development sites consider whether there are sufficient brownfield opportunities in the vicinity such that it is unnecessary to develop a green field site. However, the buoyant property markets in the National Park, at least until 2007 mean that many redevelopment opportunities in the National Park have already been developed, or have Planning Permission. Therefore there are not many brownfield sites in the National Park, and this is reflected in the prevalence of green field sites in the sites allocated for development in the Local Development Plan.
- 4.8 Other policies in the Local Development Plan focus development towards brownfield sites. Policy 25 restricts development of self-catering visitor accommodation to brownfield sites in centres; retail policies (36 and 37) promote regeneration of existing retail centres (rather than development of new out of centre retail facilities).

#### **Ensure recreation, service and employment centres are well served by public transport and non-motorised transport networks**

- 4.9 Policy 39 seeks to improve the quality of public transport services and provide alternatives to the private car in developments. Policy 40 prevents development which would result in increased volumes of traffic in congested areas. The settlement framework of the Local Development Plan aims to direct development to the most accessible locations and where services are available to minimise the need to travel.

#### **Consider development of an incentive scheme for public transport users**



4.10 Policy 39 allows facilities to improve the quality of public transport services.

**Encourage higher density, mixed use development and co-location of housing and employment wherever possible**

4.11 Policy 30 allocates sites for a combination of employment, housing and community facility uses. Policy 32 requires a minimum density of 30 dwellings per hectare on housing developments in identified centres where this is compatible with the character of the centre.

**Consider development of design guidance to ensure developments reflect local character and distinctiveness**

4.12 The definition of Sustainable Design in policy 17 includes reference to place and local distinctiveness.

4.13 Policy 50 requires that important traditional features are retained or incorporated in developments

4.14 National Park purposes (policy 7) and policy 44 on the National Park's special qualities will further ensure that developments reflect local character and distinctiveness.

**Ensure commitment to meet BREEAM 'very good' or 'excellent' standards (to ensure energy efficiency through design and operation; reuse of existing façades, structures, materials; provision of waste recycling facilities, etc.)**

4.15 Policy 17 requires high standards of resource efficiency in development proposals.

**Ensure that sustainable construction techniques are employed in all new development**

4.16 Policy 17 requires resource efficiency and waste minimisation in construction.

**Habitat creation in design of developments**

4.17 Policy 17 requires development to be well designed in terms of biodiversity and the environment.

4.18 Policy 44 aims to ensure that the Park's ecosystems are restored and enhanced, and the pattern and diversity of the landscape is protected and enhanced.

**Ensure that new development is sited to minimise exacerbation of flood risk, particularly from run-off**

4.19 Policy 22 directs development away from areas at risk of flooding, either now or as predicted for the future

4.20 Policy 20 requires Sustainable Drainage Systems on developments.

**Promote the use of SUDS where appropriate.**

4.21 Policy 20 requires Sustainable Drainage Systems on developments.

**Development and other activity (tourism/recreation) avoids damage, fragmentation, and loss of connectivity of wildlife habitats, and damage during development work should be avoided through appropriate timing and control of processes.**

4.22 Policy 44 requires that ecosystems are protected and enhanced, connectivity is maintained or created, and Biodiversity Action Plan habitats and species are protected

- 4.23 Policy 17 includes biodiversity in its definition of good design
- 4.24 Policies 46 and 47 protect sites of local conservation interest, and species and habitats more widely

### **Neighbouring Authorities' Development and Community Plans**

- 4.25 The Pembrokeshire Coast National Park Local Development Plan will interact significantly with the Community Plan for Pembrokeshire and the Development Plan for that area of Pembrokeshire not within the National Park. Pembrokeshire County Council provides all key local authority services, other than planning, for the National Park. A number of settlements straddle the Park border and are therefore planned for by both Authorities. Additionally the most urbanised area of the National Park (the area of Tenby and Saundersfoot) also has locally significant settlements in close proximity outside the boundary.
- 4.26 Therefore it is the case that when planning for an appropriate scale of growth and allocating sites for development, the outcome in many places will be the result of a combination of the Development Plan for the National Park and that for the area of Pembrokeshire outside the National Park. Circumstances might arise where each authority plans for an appropriate level of growth in a settlement, but together their plans result in an unacceptable level of growth across the whole settlement, or between neighbouring settlements on either side of the boundary. These same circumstances could conceivably arise across the boundary shared between the National Park and the Carmarthenshire and Ceredigion Local Authority areas. In order to address this issue, when assessing the suitability of potential development sites (particularly with reference to Sustainability Appraisal and Habitats Regulations Assessment) the location and scale of neighbouring Authorities' development allocations<sup>8</sup>, and the cumulative growth that may occur, has been considered. This has been done by obtaining GIS data for neighbouring Authorities' housing allocations and analysing the total provision in the vicinity of a settlement. There are a number of settlements that straddle the boundary between the National Park and the area of another Planning Authority. However, at the time of writing only one settlement, Crymych, has an allocation in a neighbouring Planning Authority area (the Pembrokeshire County Council area) as well as an allocation in the Local Development Plan for the Pembrokeshire Coast National Park. In this case the cumulative effect is unlikely to be significant as the allocation in the Pembrokeshire Coast National Park Local Development Plan only adds ten housing units to the 80 allocated outside the National Park in the Joint Unitary Development Plan for Pembrokeshire.
- 4.27 Another key interaction between the Plans for the National Park and the area of Pembrokeshire outside the National Park is the way they complement each other in terms of what they provide for the people of Pembrokeshire. The area outside the National Park tends to provide new housing, employment and retail opportunities to a disproportionate (in terms of population) degree (currently in the Joint Unitary Development Plan); whilst the National Park provides a greater proportion of the recreational opportunities for the people of Pembrokeshire than might be predicted purely on the basis of relative population. This situation reflects the Protected Landscape status of the National Park, the emergence of the strategy for limited growth of the National Park through successive development plans and the dual purposes of the National Park of conservation and enjoyment. Also National planning policies to protect the countryside are likely to result in greater opportunities for development in the larger settlements of the area outside the National Park, than in the predominantly rural National Park. The Wales Spatial Plan update refers to continuing the approaches set out in the respective Unitary Development Plans for the area, where there is a continued emphasis on the urban corridor in Pembrokeshire. Similarly, the coastal and

---

<sup>8</sup> As set out in their Unitary Development Plans

rural nature of the Park means that it has much to offer in recreation terms and will attract people from all over the county.

- 4.28 The down side of this complementarity is that is likely to lead to increased travelling. Some people will travel to employment related to recreation in the Park from homes outside the Park, whilst others will travel from homes in the Park to work outside. The main driver for travel though is likely to be people travelling to the Park for recreation, and this will grow as the population of the area outside the Park grows relative to that inside. Given that the National Park is an attractive place to visit, people from other parts of Pembrokeshire, and beyond, will want to, and should be able to, visit it. Therefore, this travel is inevitable and even desirable. In order for it to also be sustainable it is important that visitors use more sustainable modes of transport such as buses or cycling to get to and around the National Park. The Plans contain policies to encourage this behaviour, and discourage the currently preferred mode of transport, the private car.
- 4.29 Additional areas where overlaps exist are with minerals and waste. National planning policy sets out a framework where for minerals allocations are only permitted where it has been demonstrated that alternative resources are not available.<sup>9</sup> These issues are currently being debated through the South West Wales Regional Aggregates Working Group. The Park Authority is not required to provide regional waste facilities but to discuss with Pembrokeshire County Council regarding the provision of National Park only local waste facilities in the Park, or shared facilities outside the Park.

---

<sup>9</sup> Detailed advice can be found at paragraph 52 of Minerals Technical Advice Note (Wales) 1: Aggregates.

## **Social, environmental and economic baseline**

- 4.30 The baseline information for the Sustainability Appraisal is quantitative and qualitative information and data describing the social, economic and environmental state of the National Park.
- 4.31 Baseline information serves two purposes, it helps to identify the issues on which the Sustainability Appraisal should focus, and provides a benchmark against which the performance of the Plan (and the accuracy of any predictions) can be assessed. As well as showing the current situation the baseline data shows were possible the situation in the past and projections for the future, in order to indicate trends.
- 4.32 An environmental, economic and social baseline characterisation for the National Park is presented in Appendix C. As the Sustainability Appraisal progresses through the assessment of the plan and monitoring, it will be necessary to refine the baseline data and information set. More quantified and precise data and information, relevant to the sustainability objectives will need to be identified and/or acquired.

### **Data limitations**

- 4.33 Collection of baseline data for Sustainability Appraisal is subject to three difficulties:
- i. The data for an issue of interest may not be available or not have been collected.
  - ii. Timeliness of data - the only data available for an issue may be unacceptably out of date. Alternatively current data may be available, but there are no historic datasets to identify trends.
  - iii. The geography at which the data is collected or published - the finest geographical resolution for which data on most issues is published is local authority or ward. Few datasets are published for National Park areas. Even the finest resolution data generally available (data for Census Output Areas) does not cover areas that conform to the National Park boundary. Data geographies also change over time (e.g. the finest resolution of data published for the 1991 and 2001 Censuses). Therefore it is often necessary to use interpolation or other estimation techniques to derive data for the National Park area, or use data that describes a wider area.
- 4.34 Furthermore, most of the data used in the baseline has been collected by external bodies, and for purposes that may not be related to sustainability or environmental assessments.
- 4.35 The limitations of the data will have implications for the conclusions that can be drawn from the baseline and monitoring the Plan and Appraisal. These conclusions should therefore also refer to qualitative information and expert judgement and experience.

### **Likely changes in the environmental, social and economic context in the absence of the Plans**

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

4.37 In forecasting the business as usual scenario it is first necessary to determine what that means. The absence of the Plan has been taken to mean a continuation of the current Development Plan, though as this Plan moves towards and passes its end date (2016), it is likely to become less relevant and useful, and decisions will need to be made according to National policy, and the knowledge, opinions and priorities of Authority Members and Officers.

4.38 The sustainability effects of this interpretation is forecast in the table below in the context of the Sustainability Objectives. The Sustainability Objectives have been chosen as a context for this exercise because: they provide the context against which the likely effects of the Plan have been assessed; and they provide the proposed framework for sustainability monitoring.

	<b>Sustainability Objective</b>	<b>Forecast in the absence of the Plans</b>
		<b>Joint Unitary Development Plan (end date 2016)</b>
1.	Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	<p>The Joint Unitary Development sets out policies for the protection of landscape, biodiversity, the development of agricultural dwellings, conversion of buildings, farm diversification and low impact development.</p> <p>This restricts development generally in the countryside save providing certain opportunities for development.</p> <p>When the plan ends national planning policy would continue to restrict development in the countryside and therefore the opportunities for farmers and land owners to use their land for purposes other than farming. However, the absence of the Plan would mean that low impact development opportunities would not have a policy framework to allow them to be developed albeit for limited opportunities lost.</p> <p>Also by applying just the provisions of national planning policy for conversion would provide for different types of development being permitted. Again this would be a small change in the contribution it would make.</p> <p>Landscape quality and biodiversity are likely to decline more than if the Plan was not in place. This is likely because the landscape and biodiversity policies of the plan provide additional policy guidance which is amplified through the preparation of supplementary planning guidance.</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>Trends in car travel show a steady increase for Great Britain as a whole and Pembrokeshire. National policy and other external factors, such as oil prices, may curtail or reverse this trend, but car use has continued to grow in recent years in spite of rising fuel prices.</p> <p>The spatial strategy of the current development plan and national policy seek, like the proposals in the Local Development Plan, to concentrate development in main settlements, with an aim to reduce car travel. However, the Sustainable Community approach of the Joint Unitary Development Plan could result in more travel by car as the area where facilities could be provided to serve any development is large (i.e. facilities for Pontfaen could be provided in Goodwick, over 11km away).</p> <p>While the plan operates there will be assistance in the need to reduce number of journeys made by car primarily as development is concentrated in the main settlements.</p>

	<b>Sustainability Objective</b>	<b>Forecast in the absence of the Plans</b>
		<b>Joint Unitary Development Plan (end date 2016)</b>
		When the plan ends if speculative development is permitted in the absence of a key settlement strategy then , car use is likely to continue to increase more than it would in the absence of such a strategy.
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>Please see comment in terms of landscape against raised in relation to objective 1. In terms of townscapes, additional guidance is provided on Conservation Areas and development within them as supplementary planning guidance to the Plan.</p> <p>In terms of the development itself lack of the additional guidance could well mean that development is more likely to damage than protect or enhance.</p>
4.	Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	<p>An issue primarily for the Management Plan. But in land use planning terms there are policies for the protection of open space, protection of the environment and traffic management to encourage leaving the car behind.</p> <p>A loss of plan strategy and policy is likely to see some erosion of that protection and encouragement and would therefore be less likely to provide opportunities to contribute here.</p>
5.	Increase the number of visitors using the National Park outside the peak visitor season.	<p>See across and the current plan encourages increasing the number of visitors outside the Peak season through permitting additional tourist attractions, additional serviced accommodation, seeking to retain hotels and guest houses, encouraging some self catering and limited upgrading for tents and caravans.</p> <p>The range of policies which provide more detail than national planning policy would help provide a landuse framework for increasing numbers out of peak season. The absence of these policies would not seem to help with this objective as proposals would have to be judged on their individual merit without any clear strategy direction to increase visitor numbers outside peak season.</p>
6.	Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	<p>Whether in the presence or absence of a Development Plan TAN 15 will provide detailed guidance.</p> <p>The Plan includes a policy identifying circumstances where the sustainable defence of the coast is allowed and it covers issues such as acknowledging natural process and visual impact. Without the policy then In terms of defending existing development from an increased risk of flooding due to climate change, it is possible that no Plans could allow such defences to be proposed without adequate consideration of their environmental effects or long term sustainability.</p>

	<b>Sustainability Objective</b>	<b>Forecast in the absence of the Plans</b>
		<b>Joint Unitary Development Plan (end date 2016)</b>
		<p>The policies of the Plan address the protection and enhancement of biodiversity but has not taken on the concept of wildlife corridors, networks and their migration due to climate change. Land use planning's ability to address this is limited particularly given its more limited role in a National Park.</p> <p>Energy may become less available and more expensive as a result of measures to combat climate change and the decline in supplies of oil and gas. Addressing this problem in a manner in keeping with National Park purposes may prove challenging and it is debatable whether the JUDP provides the most effective framework for doing this.</p> <p>Measures to limit the effects of heat stress (e.g. building design) are covered in the emerging supplementary planning guidance on building design. In the absence of the Plan this would not be addressed.</p> <p>Over the short and medium term (until 2080, the extent of the UK Climate Impact Programme UKCIP02 climate change scenarios) the impact of climate change for the western coastal areas of the UK is likely to be that they become better places to live, at least in relative terms when compared with the rest of the UK<sup>10</sup>. This is likely to cause increased pressure for housing and other facilities, with a corresponding impact on communities.</p> <p>The Joint Unitary Development Plan will be out of date by the time these pressures come to bear and potentially (in the absence of National planning policy on the issue) there would be no clear statement about the role of National Parks and their continued protection despite these climatic changes. Adverse impacts on landscape, biodiversity, traffic generation would be expected along with the current difficulties experienced by local people in securing suitable housing likely to become greater.</p>
7.	Reduce factors contributing to climate change.	<p>The main sources of Carbon Dioxide in the National Park are traffic, and domestic and commercial heating.</p> <p>See comment on objective 2 regarding travel.</p> <p>The Joint Unitary Development Plan policy on building design is supported by emerging supplementary planning guidance which includes details on thermal efficiency of commercial and residential properties.</p>

<sup>10</sup> the UKCIP02 scenarios for 2080 suggest that while maximum late summer temperature in the southeast of England will increase by between 3.5 and 6.5 degrees C, the increase in the Pembrokeshire Coast National Park will be between 1.8 and 3.5 degrees C. Similarly the summer rainfall in eastern England will decline to a greater degree than that for the Pembrokeshire Coast National Park. Therefore though there is likely to be an increase in stormy weather in western Britain, that part of the country is likely to suffer less in terms of high temperatures and drought than eastern Britain, including the densely populated areas of southeast England. Therefore areas in western Britain, including the Pembrokeshire Coast National Park, will come under increased pressure from people wishing to live in or visit a less stressful climate leading to increased social and environmental pressures.

	<b>Sustainability Objective</b>	<b>Forecast in the absence of the Plans</b>
		<b>Joint Unitary Development Plan (end date 2016)</b>
		<p>Without this Building Regulations would set the requirements for this (which are less than the proposals in the Joint Unitary Development Plan)..</p> <p>Supplementary Planning Guidance currently in preparation will include measures to reduce greenhouse gas emissions, but these are not as comprehensive as those proposed in the Local Development Plan</p> <p>Therefore in the absence of the Plans, CO<sub>2</sub> emissions are unlikely to decline significantly, and may continue to increase.</p>
8.	Maximise the contribution of the limited opportunities for development to sustaining local communities.	<p>The Joint Unitary Development Plan provides for employment generation locally, the protection and enhancement of community facilities, the protection of employment sites and local hotels as employers in the local area, the protection of recreational open spaces, keeping the town centre and local shopping areas vibrant and a modest requirement for affordable housing provision. Where policies allocate land for these developments or there re proposals or their protection unless circumstances indicate otherwise then this does assist in their prioritisation.</p> <p>In the absence of these policies what opportunities for development there are more likely to serve 'external interests', (for example more expensive housing or the reuse of a pub as a second home), better than they do the local communities.</p>
9.	Encourage access for all to the National Park, reflecting the social mix of society.	The policies of the Joint Unitary Development Plan referred to under objective 8 will assist as will Policy 100 which deals with accessibility as does Policy 76 on design. In the absence of these policies this objective would not be addressed sufficiently beyond what statutory requirements may be in place.
10.	Maintain the cultural distinctiveness of communities.	<p>Policies of the Joint Unitary Development cover issues in relation to</p> <p>Welsh language, protection of the historic environment, the provision of affordable housing. Land use planning can only have a limited impact. In the absence on the Plan there would still be the protection of the historic environment through the various designations. There may be some decline in the absence of the Plan but this is difficult to quantify.</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.	<p>The current Development Plan and national policy only allows minerals development in National Parks in exceptional circumstances.</p> <p>Without the Plan there is detailed guidance within national planning policy which could be relied upon.</p> <p>Policies for beneficial after use apply to new developments. This context would not exist in the absence of the Plan.</p>
12.	Reduce the	Land use planning can only deal with the consequences of



	<b>Sustainability Objective</b>	<b>Forecast in the absence of the Plans</b>
		<b>Joint Unitary Development Plan (end date 2016)</b>
	negative impacts of waste.	demand arising and how they are dealt with in land use planning terms. Within that context the Joint Unitary Development Plan the National Park is not proposed for the disposal of waste to land, the disposal of hazardous waste, the disposal of inert waste. The Park allows for recycling and civic amenity sites and composting which would contribute to this objective.  In the absence of this Plan and clear strategy for the disposal of waste generally in the area then this co-ordinated approach would not be as effective and the Authority would have more difficulty in dealing with speculative applications.
13.	Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	The Joint Unitary Development Plan contains a policy to protect against the loss of community facilities and retail units, so as long as that Plan remains influential, loss of facilities should be avoided.
14.	Maintain and enhance biodiversity both within and outside designated sites	See response to objective 1.
15.	Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	The Joint Unitary Development Plan sets out policies on the protection of waterways the undeveloped coast, environmental designations and sustainable building design. Allocations are made in consultation with the Countryside Council for Wales and the Environment Agency.  Many of these issues would have a policy context in National Policy once the Plan ends except for sustainable design and the allocation of land.  In the absence of a Plan the sustainable design of buildings would be controlled by building regulations which might have lower requirements.  The Authority would also have to deal with speculative applications where the potential for adverse impact increases through ad hoc decision making in the absence of a clear strategy.

## **Sustainability Issues**

4.39 Sustainability issues were identified from five sources:

- i. The Policies, Plans and Programmes relevant to the Local Development Plan;

- ii. The baseline information gathered (presented in appendix C);
- iii. The experience of officers in the National Park Authority of issues faced when working on behalf of the Authority;
- iv. A survey of organisations with a remit on environmental, social and/or economic matters asking for their views on the key issues faced in their area of concern;
- v. A questionnaire survey of visitors to the National Park at Information Centres and other visitor facilities.

4.40 The issues emerging through this process are summarised in the following table.

Issue	Description
Effects of climate change	It is likely that climate change will have significant effects on the National Park, though the nature and scale of those effects is uncertain. The report <i>Wales: Changing Climate, Challenging Choices</i> prepared for the National Assembly for Wales, predicts for 2080 average temperature increases for Wales of up to 2.9OC; an increase in annual precipitation of up to 9%; and a rise in sea level of up to 79cm, accompanied by more frequent and violent storms. Climate change is likely to impact on economic activity (e.g. changes to farming, impact on coastal activity), biodiversity (e.g. movement of species & habitats), health (e.g. heat stress, disease) and the historic environment (e.g. flooding and storm damage).
Impact of recreation and tourism, and associated development	Great importance should be attached to the role of the National Park for tourism and recreational activities. They are beneficial to the local economy, and to the nation in terms of health and well being. However, negative impacts include traffic congestion, disturbance from activities such as jet skiing, and increased demands on the public service infrastructure. Tourism is sometimes a driver for inappropriate development proposals in the National Park. The negative impacts of tourism activity are not only felt by the environment and the resident population, but can diminish the quality of the tourism experience itself.  While the impact of tourist and recreational users is not as great in the Pembrokeshire Coast National Park as in some other National Parks, there are times and places at which the large amounts of tourism activity are a problem. The South West Wales Coastal Recreation Audit identifies 24 hotspots (sites where very high numbers of people present; and/or there are negative impacts on nature conservation designations; and/or there is conflict between different groups of users) in the National Park (see appendix C).
Limited landscape capacity to accommodate development	Both Mr P.J. MacDonald in his Inspector's Report on the Pembrokeshire Coast National Park Local Plan (paragraph 4.14) and Mr J.R. Collyer in his Inspector's Report on the Joint Unitary Development Plan for Pembrokeshire (paragraph 4.8.1) highlight the limited capacity of the National Park landscape to accommodate new development, the special status of the National Park, and the importance and appropriateness of policies to restrict development in the National Park. This limited capacity for development is likely to constrain the options available to meet other sustainability objectives and objectives for the Local Development Plan.
Dependence on	Pembrokeshire is a rural area so it is inevitable that a large

Issue	Description
private cars	<p>proportion of journeys need to be made by road in private transport. The National Atmospheric Emissions Inventory data for oxides of Nitrogen and Carbon Monoxide emissions show a strong correlation between emissions and the location of main roads suggesting that road transport causes pollution both locally and globally.</p> <p>Responses to the 2004 Pembrokeshire Visitor Survey indicate that around 90% of Pembrokeshire's visitors travel by private car. The presence of large numbers of cars, whether in car parks or on roads has a negative impact on air quality, landscape, biodiversity, and also the recreational experience. Offering limited alternatives to travel by private car can contribute to social exclusion of residents and visitors.</p>
The physical environment	<p>Air quality in the National Park is generally high though there are pollution hotspots related to road traffic. River quality is generally good, though a number of the National Park's rivers, including the Gwaun and Solva, and its coastal waters are classed as at risk or probably at risk (from diffuse and/or point source pollution; physical alteration; and/or alien species) by the Environment Agency under the Water Framework Directive. Fly tipping, and roadside and seaborne litter are the most significant waste issues for the National Park.</p>
Reconciling energy development with landscape considerations	<p>The Milford Haven waterway has an established energy industry, with further developments under construction or planned. Though mostly outside the National Park, this development has significant impact on the landscape of the Park due to its scale and visibility, and that of the associated shipping activity.</p> <p>Pembrokeshire has high potential for renewable energy development, both on shore and offshore using wind, tide and wave energy sources. However, these developments can have serious landscape impacts either as a result of the generating facility directly or support facilities.</p>
Role of agriculture (and other land based businesses)	<p>Agriculture and related activities (such as forestry) have been instrumental in shaping the National Park landscape and can continue to maintain and enhance that landscape and its associated biological and cultural diversity. Agriculture in Pembrokeshire is generally intensive which is often damaging, particularly to biodiversity and archaeological sites. The steady decline of VAT registrations in the Agriculture and Forestry sectors suggest that current economic conditions are difficult for farming and forestry, making it harder for these businesses to contribute to enhancing landscape and biodiversity, and have a sustaining role in the culture and communities of the National Park.</p>
The future of the built environment	<p>The distinctiveness of the built environment of the National Park is reflected in the number of listed buildings, ancient monuments and conservation areas. However, the built environment faces a number of pressures: the availability of suitable materials and skills to restore and maintain traditional buildings; inappropriate development affecting the setting of historic buildings and the character of settlements; and adequate protection of the built environment outside conservation areas. It is important that new building and redevelopment are aesthetically appropriate and meet the highest standards for sustainability in design and construction.</p>
The use of the	Coastal wildlife, coastal scenery and clean seas are key to the

Issue	Description
marine environment	<p>Park's recreational attraction. Its coast is a major conservation asset and corridor for species movements. The boundaries of the Pembrokeshire Marine, Cardigan Bay, and Carmarthen Bay and Estuaries Special Areas of Conservation overlap around 75% of the PCNP coastline. The National Park boundary extends to Mean Low Water Mark but this is a maritime Park, and the factors which affect its maritime aspect are material considerations in the pursuit of National Park purposes and duty.</p> <p>Principal factors affecting the marine environment around Pembrokeshire are shipping activity around Milford Haven, commercial fishing, and recreational uses including jet-skis and other noisy craft.</p>
Domestic and commercial resource use	<p>This issue covers energy and water use, and the generation of waste, in domestic and commercial activities. It also covers resource exploitation activity such as quarrying. Use of resources is inevitable for economic and social development and the general well being of the population. However, unsustainable and inefficient resource use impacts on the physical environment in terms of pollution, strain on ecosystems and landscape degradation.</p>
Important archaeological & historic resources	<p>The National Park has 279 Scheduled Ancient Monuments, and over 5800 sites in the Historic Environment Record. There are over 1200 listed buildings and 13 designated Conservation Areas. Nine Historic Landscape areas are wholly or partly within the National Park, and there are 15 Historic Parks &amp; Gardens in the National Park.</p>
Important biological resources	<p>There are 12 Special Areas of Conservation and five Special Protection Areas all or partly within the National Park. Five sites are National Nature Reserves and there is one Marine Nature Reserve</p>
Important geological resources	<p>There are 51 Geological Conservation Review sites (sites of National or International importance) in the National Park. There is also an ongoing programme to identify Regionally Important Geological Sites.</p>
Important landscape resources	<p>Designation as a National Park is primarily due to the importance of the landscape. National Parks in the UK are classified by the International Union for the Conservation of Nature as Category 5: Protected Landscapes. These are defined as an '<i>area of land, with coast and sea as appropriate, where the interaction of people and nature over time has produced an area of distinct character with significant aesthetic, ecological and/or cultural value, and often with high biological diversity. Safeguarding the integrity of this traditional interaction is vital to the protection, maintenance and evolution of such an area.</i>'<sup>11</sup></p>
Affordable housing	<p>House prices and rents in the National Park, and in Pembrokeshire as a whole are high, the lower quartile sale price for houses in 2005 was over seven times the median wage. This makes access to appropriate housing difficult for new households forming in the National Park, or existing households whose current accommodation is no longer suitable.</p>

<sup>11</sup> IUCN (1994) *Guidelines for Protected Area Management Categories*. Cambridge: IUCN

Issue	Description
Quality of employment opportunities	Though there does not appear to be a shortage of employment opportunities in Pembrokeshire the jobs available are often low paid (over 25% of full time workers earned less than £13,000 per year in 2005) and seasonal (winter benefit claimant rates are almost double those for summer).
Access to services	Closure of local services and the distance of travel to some services mean that access to essential services can be difficult in some parts of the National Park. This is aggravated by the relatively high number of households (19.3% at the 2001 Census) that do not own a car. This is an issue that requires more thorough analysis to ensure that certain sectors of the population are not excluded, and that people are not forced into increased use of private cars to access essential services.
Second and holiday homes	At the 2001 Census the National Park had one of the highest rates (18%) of second/holiday home use of its general housing stock in England and Wales. This is likely to impact negatively on the affordability of housing, and support for local facilities.
Military use of the National Park	There are a number of Ministry of Defence sites in the National Park, and there are problems associated with these in terms of disturbance, development and the restriction of access. Conversely the military presence has protected large areas from intensive agriculture and has therefore had positive effects in terms of biodiversity and the archaeological resource. The military also provide employment opportunities in the National Park.
Accessibility of the National Park as a recreational resource for all sectors of society	The 2004 Review of the National Park Authorities in Wales reported that ' <i>it is the view of national consultees that the majority of their visitors come from a narrow social grouping (i.e. white middle class)</i> '. For the National Park to meet its goals for inclusivity, opportunities to use the park for recreation need to be available to all sectors of society. Serviced and self catering accommodation needs to be available to people on a range of incomes. This inclusivity would be threatened by policies that would shift Pembrokeshire's tourism product towards the high end of the market.
The national role of the National Park in improving health and well being	The Welsh Assembly Government Strategy for Sport & Physical Activity states that ' <i>Wales needs to be more physically active in order to be a healthier nation</i> ', and that ' <i>Wales needs to maximise the synergy between sport, physical activity and the natural environment</i> '. National Parks can play a major role in providing the opportunities for physical recreation that can lead to the public health improvements sought in the Strategy. Furthermore the National Parks can, through their volunteering schemes, offer rehabilitation opportunities for those with long term health problems and disabilities.
Cultural distinctiveness	The distinctiveness of the National Park's communities is threatened by outward migration of young people and inward migration from other parts of the UK. An example of how this might manifest itself is a negative impact on the use of the Welsh language in the National Park. The percentage of Welsh speakers in the Park as a whole has increased between 1991 and 2001, but in some areas with a relatively high incidence of Welsh speakers in 1991, the percentage has decreased. With the exception of changes in the use of the Welsh language between Censuses, elements of cultural distinctiveness are difficult to define and

Issue	Description
	measure, which creates a challenge to attempts to identify and nurture the distinctive elements of National Park communities.
Demand for minerals	There is demand for quarried minerals, in part fuelled by poor rates of recycling and reuse of mineral resources, and this National Park is a rich mineral resource. Current working quarries are reaching the end of their lives. Though National Planning Policy would advise against mineral extraction within National Parks except in exceptional circumstances, since 2000 the National Park Authority has received six applications to extend quarrying activity at existing site or carry out exploratory work for new resources.
The national role of the National Park in establishing awareness, appreciation and understanding of its special qualities	<p>The second purpose of National Parks to promote understanding the special qualities of the National Parks – and influencing attitudes and behaviour - is essential to effective conservation of the Park. The goal is to impart the values, and develop the skills and understanding take part in informed decisions about how things can be done more sustainably.</p> <p>These educational outcomes are likely to reveal themselves in subtle changes in behaviour, occurring over significant periods of time. Therefore assessing the impact of the opportunities offered by the National Park in achieving these goals is likely to be difficult.</p>

## Sustainability Objectives

- 4.41 The issues identified were used to formulate sustainability objectives that together form a Sustainability Assessment Framework. This framework has been used to judge the sustainability of the objectives and policy options for the Plans.
- 4.42 The relationship between the sustainability issues identified and the Sustainability Objectives is demonstrated in the scoping report for the Sustainability Appraisal. The compatibility of the Sustainability Objectives with National Park Purposes, and their internal compatibility is also assessed in the Scoping Report. The way in which the Sustainability Objectives meet the requirements of the European Union Directive 2001/42/EC (the SEA Directive) is demonstrated in section 3.
- 4.43 These objectives are intended to indicate directions for change rather than end points. For this reason no targets are set, the goal in the context of Sustainability Appraisal is full realisation of the objective. Potential indicators for the Sustainability Objectives are presented in section 6 which outlines the proposals for monitoring the Sustainability outcomes of the Plans.

Objective Number	Sustainability Objective
1	Economically viable agriculture and forestry sectors that are 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.
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
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.
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.
12	Reduce the negative impacts 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
14	Maintain and enhance biodiversity both within and outside designated sites
15	Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.





## 5 Sustainability Appraisal of the Plans' Vision, Objectives and Policy Options

5.1 The policies in the Deposit Local Development Plan have in large part been developed from the preferred policy options considered for the Local Development Plan Preferred Strategy. For policies that have emerged directly from one or several policy options considered for the Preferred Strategy the conclusions reached then have been brought into this document and no further detailed appraisal has been done. For policies that differ from the Preferred Strategy policy option that gave rise to them, or policies added since the Preferred Strategy, a detailed appraisal has been undertaken. These detailed appraisals followed the same method as that for the policy options considered for the Preferred Strategy. Each policy was considered against each of the 15 Sustainability Objectives. The assessment matrices so generated are presented in Appendix A.

**Recommendations emerging from the Sustainability Appraisal are presented in the style of this paragraph.**

### Vision

5.2 The Local Development Plan contains a vision for the National Park describing the land use elements of the National Park Management Plan Vision . It:

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

5.3 The vision and the summary of its appraisal is included below. The full appraisal matrix is included in appendix A. The Vision has developed throughout the creation of the National Park Management Plan and Local Development Plan. For details on the Sustainability Appraisal of previous iterations of the Vision, and how it has been influence by the Sustainability Appraisal please refer to the Sustainability Appraisal of the Pembrokeshire Coast National Park Management Plan and Local Development Plan Preferred Strategy.

### **The Vision for the Pembrokeshire Coast National Park as included in the Deposit Local Development Plan**

5.4 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.

5.5 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.

- 5.6 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.
- 5.7 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.
- 5.8 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.

### **Summary of the Sustainability Appraisal of the Vision**

- 5.9 Early iterations of the Vision suggested a National Park that met the requirements of National Park purposes, while at the same time suggested significant economic and population growth based on technological leadership in the field of renewable energy. While the notion of economic growth based on sustainable technologies is laudable, Sustainability Appraisal raised concerns that the Vision was for a Park that was 'all things to everyone', and was perhaps unrealistic in the context of a National Park. These concerns have been incorporated as the Vision has developed and the vision for landuse planning 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 to the vision**

### **Compatibility of Plan objectives and Sustainability Objectives**

- 5.10 The Objectives for the Local Development Plan were assessed for their compatibility with the Sustainability Objectives. That is to say, are the steps necessary to pursue the Plan Objective likely to be the same as those that would arrive at the Sustainability Objective. Unlike the Sustainability Appraisal of the policies, which assesses whether the Plan will contribute (or not) to meeting the Sustainability Objective, this assessment also allows the reverse consideration, i.e. will pursuing the Sustainability Objective help in pursuing the Plan Objective.
- 5.11 This compatibility analysis is summarised in the following table. It is indicated where the Plan and Sustainability Objectives are likely to be compatible with a "+", where they are likely to be incompatible with a "-". Where there is no substantial relationship, or when pursuance of the Plan Objective is unlikely to have any impact on the Sustainability Objective this is indicated with a "0". Significant uncertainty in the assessment is indicated by a "?".
- 5.12 Generally the plan Objectives are found to be compatible with the Sustainability Objectives, the few exceptions usually reflect an uncertainty on how the objective might be expressed in particular circumstances. Some question marks as to the compatibility of objectives also arise from the fact that pursuing one Plan or Sustainability Objective, without heed to the others could result in success in one to the detriment of another.

For instance goals for increasing visitors and physical recreation in the Park may result in harm to biodiversity if visitor numbers and disturbance are allowed to become too great.

<p>"Sustainability Objective</p> <p>+ Objectives compatible 0 No substantive relationship or effects between objectives - Objectives incompatible ? Relationship between objectives is uncertain</p> <p>Plan Objective"</p>	<p>1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.</p>	<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>	<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>	<p>4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.</p>	<p>5. Increase the number of visitors using the National Park outside the peak visitor season.</p>	<p>6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.</p>	<p>7. Reduce factors contributing to climate change.</p>	<p>8. Maximise the contribution of the limited opportunities for development to sustaining local communities.</p>	<p>9. Encourage access for all to the National Park, reflecting the social mix of society.</p>	<p>10. Maintain the cultural distinctiveness of communities.</p>	<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.</p>	<p>12. Reduce the negative impacts of waste.</p>	<p>13. Community facilities (including health &amp; social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population.</p>	<p>14. Maintain and enhance biodiversity both within and outside designated sites.</p>	<p>15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.</p>
<p>To promote a spatial strategy that minimises the need to travel. (Policy 1, Policy 2, Policy 3, Policy 4, Policy 5, Policy 6) When releasing the scarce land supply or considering the reuse of buildings in the National Park prioritise their use or reuse for development which contributes most to sustaining local communities. (Policy 23, Policy 30, Policy 32, Policy 33, Policy 36)</p>	0/+	+	0	0	0	0	+	+	0	+	0	0	+	0	0
<p>No new mineral workings or extensions to existing mineral workings will be allowed within the National Park other than in exceptional circumstances. (Policy 10 to Policy 14)</p>	0	0	+	0	0	0	?	0	0	0	+	+	0	+	+
<p>To provide local waste facilities for National Park waste or secure facilities outside the National Park to deal with this waste.(Policy 15,Policy 16)</p>	0	0	0?	0	0	0	+	+?	0	0	0	+	0	+	+
<p>No intensification of use or extension of Ministry of Defence sites will be allowed save in exceptional circumstances.</p>	+?-	+?-	+?-	+	+	0	+?-	0	+	?	+	0	0	+/-	+

<p>"Sustainability Objective</p> <p>+ Objectives compatible</p> <p>0 No substantive relationship or effects between objectives</p> <p>- Objectives incompatible</p> <p>? Relationship between objectives is uncertain</p> <p>Plan Objective"</p>	<p>1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.</p>	<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>	<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>	<p>4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.</p>	<p>5. Increase the number of visitors using the National Park outside the peak visitor season.</p>	<p>6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.</p>	<p>7. Reduce factors contributing to climate change.</p>	<p>8. Maximise the contribution of the limited opportunities for development to sustaining local communities.</p>	<p>9. Encourage access for all to the National Park, reflecting the social mix of society.</p>	<p>10. Maintain the cultural distinctiveness of communities.</p>	<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.</p>	<p>12. Reduce the negative impacts of waste.</p>	<p>13. Community facilities (including health &amp; social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population.</p>	<p>14. Maintain and enhance biodiversity both within and outside designated sites.</p>	<p>15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.</p>
<p>To minimise the creation of new sources of pollution and contamination and to address issues relating to the instability of land within the National Park. (Policy 46)</p>	+	+	+	+	0	0	+	+	0	0	+	+	0	+	+
<p>To improve energy conservation and efficiency and to contribute to national targets for renewable energy. (Policy 21)</p>	-?+	0	+	0	0	0	+	+	0	+?	0	0	0	+/-	0
<p>To safeguard and enhance the soil, air and water quality of the National Park.</p>	+	+	+	+	0	+	+	0	0	0	+	+	0	+	+
<p>The design of all development in the National Park reflects its special landscape and townscape qualities and local distinctiveness and meets the highest standards for resource use including minimising waste, and takes account of the impact of a changing climate.(Policy 17, Policy 18, Policy 19,Policy 46,Policy 20)</p>	+	0	+	0	+	+	+	?	+	+?	+	+	0	+	+
<p>To avoid development of undeveloped and stretches of the coast at risk from flooding and/or erosion and to allow for any necessary adaptation by taking account of known and predicted</p>	+	+	+	+	0	+	0	+	0	+	+	0	0	+	+

<p>"Sustainability Objective</p> <p>+ Objectives compatible</p> <p>0 No substantive relationship or effects between objectives</p> <p>- Objectives incompatible</p> <p>? Relationship between objectives is uncertain</p> <p>Plan Objective"</p>	<p>1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.</p>	<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>	<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>	<p>4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.</p>	<p>5. Increase the number of visitors using the National Park outside the peak visitor season.</p>	<p>6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.</p>	<p>7. Reduce factors contributing to climate change.</p>	<p>8. Maximise the contribution of the limited opportunities for development to sustaining local communities.</p>	<p>9. Encourage access for all to the National Park, reflecting the social mix of society.</p>	<p>10. Maintain the cultural distinctiveness of communities.</p>	<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.</p>	<p>12. Reduce the negative impacts of waste.</p>	<p>13. Community facilities (including health &amp; social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population.</p>	<p>14. Maintain and enhance biodiversity both within and outside designated sites.</p>	<p>15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.</p>
<p>climate change impacts on the coast. (Policy 45, Policy 22, Policy 52 and Policy 53)</p>															
<p>To ensure development does not take place in locations where it may be at risk from flooding or where it would increase the risk of flooding in another location. (Policy 22)</p>	<p>+?</p>	<p>0</p>	<p>0</p>	<p>0</p>	<p>0</p>	<p>+</p>	<p>0</p>	<p>?</p>	<p>0</p>	<p>0</p>	<p>0</p>	<p>0</p>	<p>+</p>	<p>0</p>	<p>+</p>
<p>Help to create and maintain a diverse viable and sustainable local economy benefiting all sections of the community. (Policy 30 and Policy 31)</p>	<p>+</p>	<p>+</p>	<p>?</p>	<p>+</p>	<p>+</p>	<p>0</p>	<p>?</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p>?</p>	<p>+</p>	<p>+</p>	<p>0</p>	<p>0</p>
<p>To attract a sustainable number of people at all times of the year to enjoy the special qualities of the National Park. (Policy 23)</p>	<p>+</p>	<p>+/-</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p>0</p>	<p>?</p>	<p>+</p>	<p>+</p>	<p>?</p>	<p>0</p>	<p>0</p>	<p>+</p>	<p>+</p>	<p>+</p>
<p>To aim to meet the housing needs, in particular, affordable housing needs of the National Park without compromising National Park purposes. (Policy 32, Policy 33, Policy 34 and Policy 35)</p>	<p>?</p>	<p>?</p>	<p>+</p>	<p>0</p>	<p>0</p>	<p>0</p>	<p>?</p>	<p>+</p>	<p>0</p>	<p>+</p>	<p>0</p>	<p>0</p>	<p>+</p>	<p>0</p>	<p>0</p>
<p>To encourage the retention and provision of a network of community facilities which reflect the needs of both National Park residents and visitors. (Policy 36)</p>	<p>0</p>	<p>+</p>	<p>0</p>	<p>+</p>	<p>+</p>	<p>0</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p>0</p>	<p>0</p>	<p>+</p>	<p>0</p>	<p>0</p>

<p>"Sustainability Objective</p> <p>+ Objectives compatible 0 No substantive relationship or effects between objectives - Objectives incompatible ? Relationship between objectives is uncertain</p> <p>Plan Objective"</p>	<p>1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.</p>	<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>	<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>	<p>4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.</p>	<p>5. Increase the number of visitors using the National Park outside the peak visitor season.</p>	<p>6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.</p>	<p>7. Reduce factors contributing to climate change.</p>	<p>8. Maximise the contribution of the limited opportunities for development to sustaining local communities.</p>	<p>9. Encourage access for all to the National Park, reflecting the social mix of society.</p>	<p>10. Maintain the cultural distinctiveness of communities.</p>	<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.</p>	<p>12. Reduce the negative impacts of waste.</p>	<p>13. Community facilities (including health &amp; social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population.</p>	<p>14. Maintain and enhance biodiversity both within and outside designated sites.</p>	<p>15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.</p>
<p>To maintain a vital and viable retail sector at an appropriate scale and at appropriate locations throughout the National Park. (Policy 37 and Policy 38)</p>	0	+	+	+	+	0	+	+	+	+?	0	0	+	0	0
<p>To improve and promote accessibility by appropriate means and at appropriate times for the people who live, work, rest and play in the National Park whilst reducing the need to travel by private car. (Policy 40, Policy 41 and Policy 42)</p>	0	+	+	+	+	0	+	?	+	0	0	0	+	+	0
<p>To ensure adequate provision of utilities for local communities and that this provision is compatible with the National Park designation and protection of its resources.</p>	+	0	+	0	0	0	0	+	0	0	0	0	+	+	+
<p>To conserve enhance and promote the historic environment of the National Park, its archaeological resource, historic buildings and landscapes, parks and gardens. (Policy 45, Policy 50)</p>	+	+	+	?	0?+	?	0?	0	0	0	+	+	0	0?+	0?+
<p>To conserve and enhance appropriate habitats and species within the National Park and to protect and promote the geological resource. (Policy 45 and Policy 47, Policy 48)</p>	+	+	+	?	+/-	+	+	+	0	0	+	+	0	+	+

<p>"Sustainability Objective</p> <p>+ Objectives compatible 0 No substantive relationship or effects between objectives - Objectives incompatible ? Relationship between objectives is uncertain</p> <p>Plan Objective"</p>	1. Economically viable agriculture and forestry sectors that are 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.	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.	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.	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.	12. Reduce the negative impacts 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.	14. Maintain and enhance biodiversity both within and outside designated sites.	15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.
To conserve and enhance the special landscape character of the National Park. (Policy 45, Policy 51)	+	+	+	?	+/-	+	0	?	0	+	+	+	0	+	+
To conserve and enhance the cultural richness of the National Park. (Policy 45, Policy 49)	+	0	+	0	0	+	0	+	+	+	0	0	0	0	0



## Appraisal of Local Development Plan policies

- 5.13 Various Policy Options were considered when drafting the Pembrokeshire Coast National Park Management Plan and Local Development Plan (a total of 156). From these options 53 Policies were chosen for the Deposit Local Development Plan. A summary of the Sustainability Appraisal of these Policies is shown in the following tables together with the relevant Preferred Strategy Policy Options. The full appraisal of each policy is presented in Appendix A.
- 5.14 Some Policies have been selected from a set of alternative Policy Options considered for the Local Development Plan Preferred Strategy. In these cases a summary of the Sustainability Appraisal of alternative options relevant to the Local Development Plan considered in relation to each Policy is included in Appendix D. The detailed Sustainability Appraisal of these alternative Policy Options is included as Appendix E
- 5.15 Some policies in the Local Development Plan have been all or in part formulated from a set of alternative Policy Options considered for the Local Development Plan Preferred Strategy. In these cases a summary of the Sustainability Appraisal of alternative options relevant to the Local Development Plan considered in relation to each Policy is included in Appendix D. (The detailed Sustainability Appraisal of these alternative Policy Options is included as Appendix E).
- 5.16 Of particular note are the strategic Policies in the Plan relating to National Park purposes (Policy 7); the scale and location of growth (Policy 9) and key Centres (Policies 1 to 5); and housing (Policies 32 & 33).
- 5.17 No alternatives were considered for Policy 7 as any alternative would represent, to some extent, a deviation from the National Park Purposes and Duty, which are set by legislation. Therefore any alternative option would not represent a realistic approach.
- 5.18 Policies 1 to 5 and Policy 9 emerged from two sets of alternative strategic options:
- to adopt the Wales Spatial Plan Approach (Option 70\*) or to continue the Joint Unitary Development Plan approach (Option 72\*) to defining a settlement hierarchy; and
  - 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 (Option 108) or 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 (Option 109).
- 5.19 The Sustainability Appraisal concluded that policies emerging from options 70\* and 108 were best aligned with the Sustainability Objectives. The full appraisal of these options can be found in appendices D and E.
- 5.20 The housing policies (32 & 33) emerged from alternative policy options to negotiate 50% affordable housing in developments of 2 or more units and 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 (Option 60) or to continue with the Joint Unitary Development Plan approach and negotiate 20% affordable housing on sites of 3 or more units (Option 61). The Sustainability Appraisal concluded that in the context of the limited capacity for development in the National Park, and the demand for affordable housing Option 60 was best aligned with the Sustainability Objectives.
- 5.21 The policies shown here are as written prior to the final Sustainability Appraisal. Policies in the Deposit version of the Local Development Plan may differ from the wording shown here if the differences are the result of incorporating the

recommendations of the Sustainability Appraisal.

5.22 The summary symbols used below and in appendix A can be interpreted as follows:

- ++ : there is a generally consistent strong positive association between the policy option and the Sustainability Objectives.
- + : there is a weak or inconsistent, but generally positive association between the policy option and the Sustainability Objectives.
- 0 : There is not a significant association between the policy option and the Sustainability Objectives, or the association is neutral (the combination +/- is used where it is believed a policy will have both positive and negative effects with regard to a particular Sustainability Objective).
- - : there is a weak or inconsistent, but generally negative association between the policy option and the Sustainability Objectives.
- -- : there is a generally consistent strong negative association between the policy option and the Sustainability Objectives.
- ? : the association between the policy option and the Sustainability Objectives is uncertain, may be used in association with other symbols to indicate a degree of uncertainty in the conclusion.

5.23 Following consultation on the Deposit Local Development Plan the Authority identified a number of focussed changes to the Plan to address some of the concerns raised by Representors. The implications of these changes for the Sustainability Appraisal for each policy are summarised under the heading 'Implications of proposed Focussed Changes to the Plan'.

5.24 During the Examination the Inspector considered the Plan with the assumption that these focussed changes were included. The Inspector additionally made 13 recommendations for changes required to make the Plan Sound. The implications for the Sustainability Appraisal of these Recommendations is summarised under the heading ' Implications of the Inspector's Recommendations'.

5.25 Re-ordering of the Plan means that policy numbers in the Deposit and Adopted versions of the Plan are different. This Sustainability Appraisal uses the Deposit Plan policy numbers, with the numbers in the Adopted Plan shown in brackets.

<p><b>Policy 1 (Adopted Plan Policy 2): TENBY LOCAL SERVICE AND TOURISM CENTRE (TIER 2) (Strategy Policy)</b></p> <p>Tenby is designated a 'Local Service and Tourism Centre' where the land use priorities will be:</p> <p>a) to aim to meet the housing, in particular affordable housing needs of the local area</p> <p>b) to provide for employment development to meet the needs of the town</p> <p>c) to protect and enhance the town's facilities and town shopping centre which serve the town and rural hinterland.</p> <p>d) to protect and enhance the harbour area.</p> <p>e) to ensure developments permitted contribute to the protection and enhancement of the town's special qualities</p> <p>f) to permit proposals that assist in delivering improved traffic management in the town.</p>	
<p><b>Policy options appraised for the Local Development Plan Preferred Strategy</b></p>	<p><b>Summary of Appraisal</b></p>
<p>Option 70*: Adopt and complement the Wales Spatial Plan approach for the</p>	<p>+ Minerals and waste policies of the Plans should ensure a more sustainable approach</p>

Pembrokeshire Haven area when defining a settlement hierarchy	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.
<b>Overall sustainability Appraisal of Policy</b>	
+	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.
<b>Recommendation: No change to the policy</b>	
<b>Implications of proposed Focussed Changes to the Plan</b>	
<b>Change</b>	<b>SA Implications</b>
p 24: Insert footnote to the heading of Policy 1 cross referencing to Policy 23.	None
Paragraph 4.21, page 23: Insert "Development allocations in Tenby have the potential for likely significant effect on Natura 2000 sites."	Will further ensure impact on Natura 2000 sites is avoided or adequately mitigated against when allocated sites are developed.
Clause d, p24: Cross reference to Policy 53.	None
Clauses a to c, p 24: insert a reference to "the needs of the local area".	Unlikely to be significant but may improve performance with regard to Sustainability Objectives 8 and 13. Area of concern is only widened for employment related activity; this could have transport implications and a negative impact on Sustainability Objective 2, though it is unlikely that any outcome would differ from current patterns of commuting.
Clause c, p 24: insert cross reference to explain that the land allocated for mixed/employment purposes are listed in Table 3.	None

<p><b>Policy 2 (Adopted Plan Policy 3): NEWPORT LOCAL CENTRE (TIER 3) (Strategy Policy)</b></p> <p>Newport is designated a 'Local Centre' where the land use priorities will be:</p> <ul style="list-style-type: none"> <li>a) to aim to meet the housing, in particular affordable housing needs of the local area</li> <li>b) to provide for employment development to meet the needs of the town</li> <li>c) to provide an opportunity to develop work/live units in the town(to be identified in the Deposit Local Development Plan)</li> <li>d) to protect and enhance the district shopping centre and community facilities which serve the town and rural hinterland</li> <li>e) to ensure developments permitted contribute to the protection and enhancement of the town's special qualities</li> <li>f) to permit proposals that assist in delivering improved traffic management in the town where these do not compromise the town's special qualities.</li> </ul>
--

<b>Policy options appraised for the Local Development Plan Preferred Strategy</b>		<b>Summary of Appraisal</b>
Option 70*: Adopt and complement the Wales Spatial Plan approach for the Pembrokeshire Haven area when defining a settlement hierarchy		+ 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.
<b>Overall sustainability Appraisal of Policy</b>		
+	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.	
<b>Recommendation: No change to the policy</b>		
<b>Implications of proposed Focussed Changes to the Plan</b>		
<b>Change</b>	<b>SA Implications</b>	
Paragraph 4.25, page 24: insert "Development allocations in Newport have the potential for likely significant effect on Natura 2000 sites."	Will further ensure impact on Natura 2000 sites is avoided or adequately mitigated against when allocated sites are developed.	
Clauses a to c, p 25: insert a reference to "the needs of the local area".	Unlikely to be significant but may improve performance with regard to Sustainability Objectives 8 and 13. Area of concern is only widened for employment related activity; this could have transport implications and a negative impact on Sustainability Objective 2, though it is unlikely that any outcome would differ from current patterns of commuting.	
Clause b, p 25: insert cross reference to explain that the land allocated for mixed/employment purposes are listed in Table 3.	None	
Clause c, p 25: in brackets replace "to be" with "as" and replace "the Deposit Local Development Plan" with "Policy 30, Table 3".	None	
Clause f, p 25: delete reference to special qualities as this will be covered by Policy 45.	Given that the change is made to make Policy 2 consistent with Policies 1, 3 & 4, and that Policy 45 will ensure that the National Park's Special Qualities are protected, the change is unlikely to make any difference to the sustainability of the Plan.	

**Policy 3 (Adopted Plan Policy 4): SAUNDERSFOOT LOCAL CENTRE (TIER 3) (Strategy Policy)**

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

<p>a) to aim to meet the housing, in particular affordable housing needs of the local area.</p> <p>b) to encourage small scale employment opportunities.</p> <p>c) to protect and enhance the district shopping centre and community facilities which serve the village and rural hinterland</p> <p>d) to ensure developments permitted contribute to the protection and enhancement of the village's special qualities</p> <p>e) to permit proposals that assist in delivering improved traffic management in the village and accessibility to the railway station</p> <p>f) to protect and enhance the harbour.</p>	
<b>Policy options appraised for the Local Development Plan Preferred Strategy</b>	<b>Summary of Appraisal</b>
Option 70*: Adopt and complement the Wales Spatial Plan approach for the Pembrokeshire Haven area when defining a settlement hierarchy	+ 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.
<b>Overall sustainability Appraisal of Policy</b>	
+	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.
<b>Recommendation: No change to the policy</b>	
<b>Implications of proposed Focussed Changes to the Plan</b>	
<b>Change</b>	<b>SA Implications</b>
Clause f, p26: Cross reference to Policy 53.	None
Clauses a to c, p 26: insert a reference to "the needs of the local area".	Unlikely to be significant but may improve performance with regard to Sustainability Objectives 8 and 13. Area of concern is only widened for employment related activity; this could have transport implications and a negative impact on Sustainability Objective 2, though it is unlikely that any outcome would differ from current patterns of commuting.

<p><b>Policy 4 (Adopted Plan Policy 5): ST DAVIDS LOCAL CENTRE (TIER 3) (Strategy Policy)</b></p> <p>St Davids is designated a 'Local Centre' where the land use priorities will be:</p> <p>a) to aim to meet the housing, in particular affordable housing needs of the local area</p> <p>b) to provide for employment development to meet the needs of the City</p> <p>c) to provide for live/work units in the City</p> <p>d) to protect and enhance the district shopping centre and community facilities which serve the City and rural hinterland</p> <p>e) to ensure developments permitted contribute to the protection and enhancement of the City's special qualities</p> <p>f) to permit proposals that assist in delivering improved traffic management in the City and wider peninsula</p>
---

<b>Policy options appraised for the Local Development Plan Preferred Strategy</b>		<b>Summary of Appraisal</b>
Option 70*: Adopt and complement the Wales Spatial Plan approach for the Pembrokeshire Haven area when defining a settlement hierarchy		+ 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.
<b>Overall sustainability Appraisal of Policy</b>		
+	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.	
<b>Recommendation: No change to the policy</b>		
<b>Implications of proposed Focussed Changes to the Plan</b>		
<b>Change</b>	<b>SA Implications</b>	
Paragraph 4.33, page 26: insert as appropriate into these paragraphs: "Development allocations in St Davids have the potential for likely significant effect on Natura 2000 sites."	Will further ensure impact on Natura 2000 sites is avoided or adequately mitigated against when allocated sites are developed.	
Clauses a to c, p 27: insert a reference to "the needs of the local area".	Unlikely to be significant but may improve performance with regard to Sustainability Objectives 8 and 13. Area of concern is only widened for employment related activity; this could have transport implications and a negative impact on Sustainability Objective 2, though it is unlikely that any outcome would differ from current patterns of commuting.	
Clause b, p 27: insert cross reference to explain that the land allocated for mixed/employment purposes are listed in Table 3.	None	
Paragraph 4.33, p27: Replace "Park and Ride Scheme" with "Celtic Coaster Service".	None	

<b>Policy 5 (Adopted Plan Policy 6): RURAL CENTRES (TIER 4) (Strategy Policy)</b>	
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	
<b>Policy options appraised for the Local Development Plan Preferred Strategy</b>	<b>Summary of Appraisal</b>
Option 70*: Adopt and complement the Wales Spatial Plan approach for the	+ Minerals and waste policies of the Plans should ensure a more sustainable approach

Pembrokeshire Haven area when defining a settlement hierarchy	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.
<b>Overall sustainability Appraisal of Policy</b>	
+	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. Project level Habitat Regulations Assessment will be necessary on some allocations to avoid adverse impact on Natura 2000 sites.
<b>Recommendation: No change to the policy</b>	
<b>Implications of proposed Focussed Changes to the Plan</b>	
<b>Change</b>	<b>SA Implications</b>
Paragraph 4.37, page 27: insert "Development allocations in Broad Haven, Lawrenny and St Ishmaels have the potential for likely significant effect on Natura 2000 sites."	Will further ensure impact on Natura 2000 sites is avoided or adequately mitigated against when allocated sites are developed
Page 28: Delete 'Llanychaer' from the policy. The Llanychaer Inset would then move to the 'Out of Centre' Group of maps.	The qualifying criteria for Rural Centres is based on attaining a minimum level of services, to ensure that development in such locations is sustainable in terms of minimising the need to travel to services, and ensuring services are accessible to the whole community. Llanychaer no longer meets the qualifying criteria as its post office has closed. Therefore its deletion from the list of Rural Centres is aimed at steering development away from a less sustainable location.

<p><b>Policy 6 (Adopted Plan Policy 7): COUNTRYSIDE (TIER 5) (Strategy Policy)</b></p> <p>Outside the identified Centres of the Local Development Plan area development will be strictly controlled except for:</p> <ul style="list-style-type: none"> <li>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</li> <li>b) housing for essential farming or forestry needs is proposed</li> <li>c) farm diversification including farm shops is proposed</li> <li>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.</li> <li>e) Tourist attractions or recreational activity is proposed where the need to locate in the countryside is essential - see Policy 23</li> <li>g) The enhancement of community facilities is proposed</li> <li>h) The proposal constitutes low impact development making a positive contribution -</li> </ul>
--

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.	
<b>Policy options appraised for the Local Development Plan Preferred Strategy</b>	<b>Summary of Appraisal</b>
Option 70*: Adopt and complement the Wales Spatial Plan approach for the Pembrokeshire Haven area when defining a settlement hierarchy	+ 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 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.	+ Include reference to the need for proposals in remote locations to ensure there is no adverse traffic impact. See proposed new policy option under transport. 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.
<b>Overall sustainability Appraisal of Policy</b>	
+	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'.  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.
<b>Recommendation: The wording of the opening statement, and clause d with regard to buildings unsuitable for conversion needs to be reviewed.</b>	
<b>Implications of proposed Focussed Changes to the Plan</b>	
<b>Change</b>	<b>SA Implications</b>
Footnote 83, p29: Insert the words: 'Employment related uses could include residential conversion as a subordinate part of a scheme.' After the words 'and recreational activities'	May increase the sustainability of the conversion in both employment and residential aspects, by reducing the need to travel and increasing the economic viability.
critterion a), p29: Add in brackets after minor extensions "(i.e. rounding off)"	None
Para 4.47, p30: Amend the first sentence of Paragraph 4.47 to read: 'The presence of a species protected under European or United	Strengthens the wording to protect biodiversity but is unlikely to be significant as it is a statement of fact regarding the



Kingdom legislation is a material consideration in the planning process.'	wider context in which the Plan will operate.
Clause d), p29: Delete "delivery" (line 2) and transfer sentence "Accessibility to...consideration" to the end of d).	None
p29, footnote 82: Insert reference to PPW 7.3.3 in footnote 82 "Local Planning Authorities should adopt a positive approach to development associated with farm diversification in rural areas, irrespective of whether farms are served by public transport".	Would help the sustainability of farming (Sustainability Objective 1) but may lead to increased travel by car.
paragraph 4.43, page 29: Insert at the end of paragraph 4.43: 'Paragraph 7.6.10 of Planning Policy Wales March 2002 provides for the option of prioritising employment related uses. This Authority has attempted to prioritise employment related uses under the Joint Unitary Development Plan and found this difficult to operate. Beyond holiday letting there is little demand for employment related activities. The Authority could also not rationalise not allowing affordable housing provision as a first option given the need for affordable housing and yet the Authority would allow holiday let (considered to be an employment related use in the Joint Unitary Development Plan.) This is why this Plan now proposes a range of uses which includes affordable housing provision being given priority in proposals for two or more residential units.'	None. Does not alter the policy position of the Plan, rather provides a justification for it.

<p><b>Policy 7 (Adopted Plan Policy 1): NATIONAL PARK PURPOSES AND DUTY (Strategy Policy)</b></p> <p>Development within or impacting on the National Park must be compatible with:</p> <p>a) the conservation or enhancement of the natural beauty, wildlife and cultural heritage of the Park, and</p> <p>b) the public understanding and enjoyment of those qualities.</p> <p>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.</p>	
<p><b>Policy options appraised for the Local Development Plan Preferred Strategy</b></p>	<p><b>Summary of Appraisal</b></p>
<p>Option 92: Development within or impacting on the National Park must be compatible with the conservation or enhancement of the natural beauty, wildlife and cultural heritage of the Park, and 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</p>	<p>Not appraised as this policy reflects the National Park's statutory purposes and duty</p>

communities within the Park provided this is compatible with the statutory National Park purposes embodied in the foregoing considerations.	
<b>Overall sustainability Appraisal of Policy</b>	
	Not appraised as this policy reflects the National Park's statutory purposes and duty.
<b>Implications of proposed Focussed Changes to the Plan</b>	
<b>Change</b>	<b>SA Implications</b>
Delete "or impacting on" in the first line. Amend last sentence in para 4.55 to clarify the NPA will use same principles as set out in Policy 7 when commenting on proposals outside of the National Park (the same applies to para 4.236).	Development outside the National Park may impact negatively on its landscape (Sustainability Objective 3), but the National Park Authority cannot control development outside its boundaries. The additional wording to paragraph 4.55 should ensure that National Park purposes are a consideration in development decisions outside its borders.

<b>Policy 8 (Adopted Plan Policy 19): Hazardous Installations</b>	
Development within safeguarding zones around hazardous installations will be permitted where there is no unacceptable risk to either:	
<ul style="list-style-type: none"> <li>a) public health or safety; or</li> <li>b) the operation of the hazardous installations; and</li> <li>c) the access to the hazardous installations.</li> </ul>	
<b>Policy options appraised for the Local Development Plan Preferred Strategy</b>	<b>Summary of Appraisal</b>
Option 58: Include policies relating to the location of establishments where hazardous substances are used or stored and to the development of land within the vicinity of establishments where hazardous substances are present.	+ The plan objective/option is a must have and as such does not strongly impact specifically on any sustainability objectives. It will positively impact on the Strategic Environmental Assessment theme to protect public health. The option could however be more clearly expressed and an amendment is proposed so that the policy states the following 'Include policies to maintain appropriate distances between hazardous installations and other development'
Option 59: To consider proposals for hazardous development against the Major Development Test, without indicating general locations where further hazardous development may be acceptable.	+ Ensuring hazardous development proposals satisfy the Major Development Test, could benefit community and landscape sustainable objectives.
<b>Overall sustainability Appraisal of Policy</b>	
0	The policy options investigated for the Preferred Strategy consider the siting of hazardous development, whereas this policy considers general development in the area of an existing hazardous installation. This policy is not relevant to the sustainability framework developed for the Local Development Plan. However, it is necessary for public protection.
<b>Recommendation: No change to the policy</b>	

<b>Policy 9 (Adopted Plan Policy 20): SCALE OF GROWTH (Strategy Policy)</b>	
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.	
<b>Policy options appraised for the Local Development Plan Preferred Strategy</b>	<b>Summary of Appraisal</b>
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.	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.
<b>Overall sustainability Appraisal of Policy</b>	
+	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. <b>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 &amp; 32.</b>
<b>Recommendation: No change to the policy</b>	

<b>Policy 10 (Adopted Plan Policy 21): Minerals Safeguarding</b>	
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.	
<b>Policy options appraised for the Local Development Plan Preferred Strategy</b>	<b>Summary of Appraisal</b>
<b>Overall sustainability Appraisal of Policy</b>	
+	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.
<b>Recommendation: No change to the policy</b>	
<b>Implications of proposed Focussed Changes to the Plan</b>	
<b>Change</b>	<b>SA Implications</b>
Include factual information about the extent of the coalfield in the National Park as follows, and immediately prior to footnote 96. " The South Wales Coalfield extends	None

<p>west into Pembrokeshire, becoming the Dauceddau Coalfield. It crosses the central belt of the National Park from Broad Haven to the west, across Hook in the centre and Saundersfoot in the East”.</p>	
<p>Paragraph 4.70, p37: A new policy is proposed for insertion “Buffer Zones. Buffer Zones around active and inactive mineral extraction sites are shown on the proposals map”. Supporting text to the Policy to state “Buffer Zones are defined in accordance with Minerals Planning Policy Wales (paragraph 40), Minerals Technical Advice Note 1 Aggregates (paragraphs 70 and 71) and Minerals Technical Advice Note 2 Coal (paragraphs 32 and 33) and serve the purposes set out in National Guidance. Consideration of planning proposals within Buffer Zones will be inline with National Guidance”.</p>	<p>As this change adds information to the plan to comply with National policy there will be no impact in terms of the Sustainability Appraisal.</p>

<p><b>Policy 11 (Adopted Plan Policy 23): Borrow Pits</b></p>	
<p>Temporary planning permission will be granted for borrow pits where:</p>	
<p>a) the borrow pit is required to supply a specific short-term construction project with appropriate material; and</p> <p>b) extraction will cease upon completion of the construction scheme; and</p> <p>c) is closely located in relation to the proposed construction project; and</p> <p>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</p> <p>e) the scale of the development is appropriate for the locality; and</p> <p>f) the development will not irretrievably damage the local landscape and local environment; and</p> <p>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</p> <p>h) any material transported by public highway can be accommodated within the local road network; and</p> <p>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.</p>	
<p><b>Policy options appraised for the Local Development Plan Preferred Strategy</b></p>	<p><b>Summary of Appraisal</b></p>
<p>Option 120: Consider an initiative promoting the local small-scale working of appropriate building stone.</p>	<p>+ A positive balance in respect of SA objectives</p>
<p><b>Overall sustainability Appraisal of Policy</b></p>	
<p>+</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. <b>The Habitat Regulations Assessment concludes that the impact on</b></p>

<b>Natura 2000 sites can only be assessed at project level.</b>	
<b>Recommendation: No change to the policy</b>	
<b>Implications of proposed Focussed Changes to the Plan</b>	
<b>Change</b>	<b>SA Implications</b>
Paragraph 4.73, p38: Insert footnote referring to MPPW para 52.	None
Paragraph 4.73, p38: A footnote to criterion i) to refer to Minerals Technical Advice Note 1: Aggregates paragraph 136, Minerals Technical Advice Note 2: Coal Appendix Q8 (page 118).	The guidance on after use in MTANs 1 and 2 will assist in meeting Sustainability Objectives 11 and 14.

<b>Policy 12 (Adopted Plan Policy 24): Local Building Stone</b>	
Planning permission will be granted for quarrying of local building stone where:	
<p>a) the material is required to supply a specific proven local need and exceptional circumstances can be demonstrated; and</p> <p>b) is closely located in relation to the proposed construction or development site; and</p> <p>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</p> <p>d) the scale of the development is appropriate for the locality and to serve the local market; and</p> <p>e) the development will not have an unacceptably adverse impact or damage the local landscape and local environment; and</p> <p>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</p> <p>g) The local road network has the capacity to accommodate the traffic arising from the development; and</p> <p>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.</p>	
<b>Policy options appraised for the Local Development Plan Preferred Strategy</b>	<b>Summary of Appraisal</b>
<b>Overall sustainability Appraisal of Policy</b>	
+	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. The Habitat Regulations Assessment concludes that the impact on Natura 2000 sites can only be assessed at project level.
<b>Recommendation: No change to the policy</b>	
<b>Implications of proposed Focussed Changes to the Plan</b>	
<b>Change</b>	<b>SA Implications</b>
Clause h), p39: Cross reference to MTAN1 paragraph 136.	The guidance on after use in TAN 1 will assist in meeting Sustainability Objectives 11 and 14.

<b>Policy 13 (Adopted Plan Policy 25): Recycled, Secondary and Waste Materials</b>	
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.	
<b>Policy options appraised for the Local Development Plan Preferred Strategy</b>	<b>Summary of Appraisal</b>
Option 86: To promote aggregates recycling, the use of alternatives and the efficient use of mineral resources	+? With the exception of the impact on waste this option would need to address minerals use and recycling outside the National Park to achieve a significant reduction in the impacts of the minerals industry on the National Park.
<b>Overall sustainability Appraisal of Policy</b>	
+	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.
<b>Recommendation: No change to the policy</b>	

<b>Policy 14 (Adopted Plan Policy 26): Inactive Mineral Sites</b>	
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).	
<b>Policy options appraised for the Local Development Plan Preferred Strategy</b>	<b>Summary of Appraisal</b>
<b>Overall sustainability Appraisal of Policy</b>	
+	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.
<b>Recommendation: No change to the policy</b>	
<b>Implications of proposed Focussed Changes to the Plan</b>	
<b>Change</b>	<b>SA Implications</b>
Paragraph 4.78: Advise that 'The inactive site at Penberry near St Davids is shown on the Proposals Map.' Also advise 'Bottom Meadow Quarry is currently inactive (October 2009). Other inactive sites will be kept under review to ensure high standards of environmental protection appropriate the National Park are maintained.'	Effects will probably be minimal but positive with regard to Sustainability Objective 11.

<b>Implications of the Inspector's Recommendations</b>	
<b>Inspector's Recommendation</b>	<b>SA Implications</b>
Recommendation 13: Add the following text to paragraph 4.78, to follow that to be inserted by Focussed Changes 26: 'The Authority will provide Supplementary Planning Guidance on land instability arising from former coal mining working. Further information about land instability from natural processes and from other non-coal mining operations can be obtained from the British Geological Survey'. A footnote reference to the BGS web site should also be included.	The Supplementary Planning Guidance referred to, together with the advice from the British Geological Survey, will help avoid damage to developments as a result of former coal working. Though this approach might preclude certain development in affected areas the sustainability implications are minimal as such developments would have been found to be unachievable or represent significant risk to the developer or users.

<b>Policy 15 (Adopted Plan Policy 27): Local Waste Management Facilities</b>	
Local waste management and recycling facilities which serve only the National Park area will be permitted provided	
<ul style="list-style-type: none"> <li>a) the site would be conveniently located in relation to the needs of the National Park community; or</li> <li>b) they are located at existing waste management sites or B2 industrial units; and</li> <li>c) the proposal makes provision for adequate screening so as to minimise any adverse effects; and</li> <li>d) the development is sufficiently distanced from neighbouring properties so as not to constitute a potential health or safety hazard; and</li> <li>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.</li> </ul>	
<b>Policy options appraised for the Local Development Plan Preferred Strategy</b>	<b>Summary of Appraisal</b>
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.
<b>Overall sustainability Appraisal of Policy</b>	
+	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.
<b>Recommendation: No change to the policy</b>	
<b>Implications of proposed Focussed Changes to the Plan</b>	
<b>Change</b>	<b>SA Implications</b>
Additional text to be provided at paragraph 4.81, following the 5 <sup>th</sup> sentence, to read "The existing Civic Amenity Site at St Davids also serves communities outside the National Park. Future redevelopment proposals for this site will be considered as an exception to Policy 15 provided the site	If the St Davids site is closer to a community outside the Park than any civic amenity site outside the Park then allowing that community to use it will reduce travel helping meet Sustainability Objective 2. Any extra waste processed in the National Park is likely to be sustainably processed (i.e.

continues to predominately serve the National Park Communities”.	recycled) rather than disposed of unsustainably (e.g. to landfill).
--	---

<b>Policy 16 (Adopted Plan Policy 28): Composting</b>	
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:	
<ul style="list-style-type: none"> <li>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</li> <li>b) the capacity of the local road network.</li> <li>c) there is provision for landscaping and/or screening of the site; and</li> <li>d) there are adequate steps to deal with leachate; and</li> <li>e) the product has added value.</li> </ul>	
<b>Policy options appraised for the Local Development Plan Preferred Strategy</b>	<b>Summary of Appraisal</b>
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.
<b>Overall sustainability Appraisal of Policy</b>	
++	Composting in community or larger facilities is likely to represent a strongly sustainable way of dealing with suitable waste.
<b>Recommendation: No change to the policy</b>	

<b>Policy 17 (Adopted Plan Policy 29): SUSTAINABLE DESIGN (Strategy Policy)</b>
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:
<ul style="list-style-type: none"> <li>a) Place and local distinctiveness (see Policy 45)</li> <li>b) Environment and biodiversity (see Policy 45)</li> <li>c) Community cohesion and health (see Policy 18)</li> <li>d) Accessibility (see Policy 40)</li> <li>e) Energy use</li> <li>f) Energy generation (see Policy 22)</li> <li>g) Materials and resources (see Policy 19)</li> <li>h) Water and drainage (see Policy 20)</li> <li>i) Waste (see Policy 19)</li> <li>j) Resilience to climate change</li> </ul>
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.



<b>Policy options appraised for the Local Development Plan Preferred Strategy</b>		<b>Summary of Appraisal</b>
<p>Option 113: Policy to set out an integrated approach to design, considering: Place and local distinctiveness; environment and Biodiversity; Energy use; Materials and resources; Water and drainage; Robust building</p> <p>The policy should be supported by Design Guidance and a sustainability appraisal tool, and there should be a requirement for applications to be accompanied by Sustainable Design Statements</p>		<p>++ The option demonstrates a significant positive balance in respect of SA objectives, but its application will need to be sensitive to the needs of the local community and affordability.</p>
<p>Option 114: Provide /Facilitate an energy/resource information service in the National Park (and wider County).</p>		<p>+ Positive contribution to SA objectives, and ideally such a service would be part of a Wales-wide network, substantially funded by WAG.</p>
<p>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</p>		<p>++ 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</p>
<p>Option 115: Require all new dwellings and other new buildings to achieve BREEAM/EcoHomes "Excellent" rating</p>		<p>++ Potential for a very positive contribution to meeting SA objectives.</p>
<p>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.</p>		<p>++? 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.</p>
<p>Option 120: Consider an initiative promoting the local small-scale working of appropriate building stone.</p>		<p>+ A positive balance in respect of SA objectives</p>
<p>Option 122: Promote/facilitate local traditional building techniques and practices</p>		<p>+ A positive balance in respect of SA objectives</p>
<b>Overall sustainability Appraisal of Policy</b>		
+	<p>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.</p>	
<b>Recommendation: No change to the policy</b>		
<b>Implications of proposed Focussed Changes to the Plan</b>		
<b>Change</b>	<b>SA Implications</b>	
Delete the requirement for on-site and/or	A study commissioned by the National Park	

<p>near-site and renewable or low-carbon energy technologies for the sites at Brynhir, Tenby and Glasfryn Lane St Davids.</p>	<p>Authority<sup>12</sup> on the potential of these sites for renewable or low-carbon energy technologies concluded that the sites were too small for such approaches to be effective. Better results in terms of reducing the carbon emissions will be gained from energy efficiency improvements and renewable energy technologies at the individual housing unit level.</p>
<p>Clause f: correct cross reference in to refer to Policy 21.</p>	<p>None</p>
<p>Paragraph 4.91, p45: Insert footnote at after the words 'Assembly Government policy' referring to "Ministerial Interim Planning Policy Statement 01/2009 Planning for Sustainable Buildings" May 2009.</p>	<p>None</p>
<p>Delete the requirement to include solar panels in proposals.</p>	<p>National planning policy will require all new dwellings to achieve Code for Sustainable Homes level 3 (with an extra point in the CO<sub>2</sub> emissions category, ENE1). If renewable energy generation technologies are not used to meet this requirement the equivalent improvements to the building fabric will be necessary, yielding the same outcome for CO<sub>2</sub> emissions.</p>
<p>Insert after paragraph 4.94, p46 "In respect of criterion h: early consultation with Environment Agency Wales and Countryside Council for Wales should be undertaken to ensure that development is appropriately located, designed and/or phased to avoid adverse impacts on Natura 2000 sites in terms of water resource demands and water quality, and development will be permitted only where there are assured water supplies from sources that would not have an adverse effect on Natura 2000 sites. In exceptional circumstances it may be necessary to reduce the number of units on allocations where it is the only effective mitigation to ensure no adverse effect on the integrity Natura 2000 sites. Developments which might have the potential to affect European sites will be subject to Habitats Regulations Appraisal and Environmental Impact Assessment at project level. Water Cycle Studies (and surface water management plans) may also be necessary."</p>	<p>Will further ensure impact on Natura 2000 sites is avoided or adequately mitigated against when allocated sites are developed.</p>

**Policy 18 (Adopted Plan Policy 30): Amenity**

<sup>12</sup> Housing Site Assessment - Options for low and zero carbon technologies at: Brynhir and Butts Field - Tenby Glasfryn Road - St David's. Technical Report. Prepared by The National Energy Foundation for Pembrokeshire Coast National Park Authority, August 2009.  
Sustainability Appraisal of the Pembrokeshire Coast National Park Local Development Plan  
Adopted Plan September 2010

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.	
<b>Policy options appraised for the Local Development Plan Preferred Strategy</b>	<b>Summary of Appraisal</b>
<b>Overall sustainability Appraisal of Policy</b>	
+	The policy is appropriate in sustainability terms, particularly in the context of the first National park purpose.
<b>Recommendation: No change to the policy</b>	
<b>Implications of proposed Focussed Changes to the Plan</b>	
<b>Change</b>	<b>SA Implications</b>
Insert 'not' between 'Development will' and 'be permitted', delete 'does not have' and insert 'has' in the wording of Policy 18.	The change clarifies the wording of the policy which has been assessed positively in the Sustainability Appraisal.

<b>Policy 19 (Adopted Plan Policy 31): Minimising Waste</b>	
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.	
<b>Policy options appraised for the Local Development Plan Preferred Strategy</b>	<b>Summary of Appraisal</b>
Option 134: To increase awareness through education about the importance of reducing waste and recycling, reusing and other sustainable options for waste.	+ This option would encourage sustainable use of materials, reduction of waste and its contribution to changing climate. Increased awareness and resulting changes in behaviour could also improve community sustainability, as well as reducing the negative impacts of waste
Option 135: To continue to work with partners to address waste issues, including litter and fly tipping.	+ This option would have benefits to the landscape, biodiversity and water quality in particular. Partnership working, particularly involving local communities can also have positive effects on communities
<b>Overall sustainability Appraisal of Policy</b>	
+	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.
<b>Recommendation: No change to the policy</b>	
<b>Implications of proposed Focussed Changes to the Plan</b>	
<b>Change</b>	<b>SA Implications</b>
Paragraph 4.99, p46: Insert "and non-	If there is any effect of expanding the scope

domestic" after "household" and insert "kerbside" after "doorstep" in the second sentence. Delete "Space" and replace "recyclate" with "recycled" in final paragraph sentence.	to include non-domestic waste it will be to increase the waste recycled and so improve the sustainability of the policy.
--	--

<b>Policy 20 (Adopted Plan Policy 32): Surface Water Drainage</b>	
Development will be required to incorporate sustainable drainage systems for the disposal of surface waters on site.	
<b>Policy options appraised for the Local Development Plan Preferred Strategy</b>	<b>Summary of Appraisal</b>
<b>Overall sustainability Appraisal of Policy</b>	
+	The policy will have positive sustainability outcomes by helping prevent flooding and pollution
<b>Recommendation: No change to the policy</b>	
<b>Implications of proposed Focussed Changes to the Plan</b>	
<b>Change</b>	<b>SA Implications</b>
Paragraph 4.105, p47: Insert "The Environment Agency does not support the inclusion of culverting and seeks the removal of culverting where ever possible"	None

<b>Policy 21 (Adopted Plan Policy 33): RENEWABLE ENERGY (Strategy Policy)</b>	
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.	
<b>Policy options appraised for the Local Development Plan Preferred Strategy</b>	<b>Summary of Appraisal</b>
Option 104: To devise a renewable energy assessment, through the Wales Spatial Plan, Pembrokeshire Haven Key Settlement Framework, setting out the renewable energy resources, technologies, energy efficiencies and conservation measures.	This option is consistent with para 12.9.1 of MIPPS 01/2005
Option 105: Encourage on site renewable energy development at an appropriate scale where community schemes have already been explored.	+ 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	+ 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.
<b>Overall sustainability Appraisal of Policy</b>	
+	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. The environmental protection contained in the policy should ensure no adverse effects on Natura 2000 sites.
<b>Recommendation: No change to the policy</b>	

<b>Policy 22 (Adopted Plan Policy 34): FLOODING &amp; COASTAL INUNDATION (Strategy Policy)</b>	
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.	
<b>Policy options appraised for the Local Development Plan Preferred Strategy</b>	<b>Summary of Appraisal</b>
Option 26: Development will be directed away from those areas which are at risk from flooding with only those developments less vulnerable to the consequences of flooding permitted in flood risk areas.	+ 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 21 <sup>st</sup> 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.
Option 27: To allow for sustainable defence of the coast to protect existing communities or assets where practicable but with long term management to allow the natural evolution of the coast.	? This option seems to imply that short term measures would be undertaken to protect the coast in certain places, the sustainability outcomes of which would be mixed. 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, in

	many ways a reverse of the short term outcomes.
<b>Overall sustainability Appraisal of Policy</b>	
+	<p>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. The supporting text considering impact on Natura 2000 sites will be important in ensuring no adverse impact on Natura 2000 sites.</p>
<b>Recommendation: Change wording regarding LIDAR and flood modelling</b>	
<b>Implications of proposed Focussed Changes to the Plan</b>	
<b>Change</b>	<b>SA Implications</b>
Amend to refer to the Development Advice Maps and add the following to footnote 111 "The Development Advice Maps (2009) identify areas liable to flood based on historic events (Zone B) and the Environment Agency's flood zone 2 (Zones C1 and C2). The Environment Agency's flood maps zones 2 and 3 identify the probability of areas flooding based on modelled data. The emerging Shoreline Management Plan 2s will identify areas liable to flood from the sea, with a long timescale. The data from all three sources will be used to identify areas liable to flooding for the purposes of this policy."	None

**Policy 23 (Adopted Plan Policy 35): 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.

<b>Policy options appraised for the Local Development Plan Preferred Strategy</b>	<b>Summary of Appraisal</b>
Option 40: Proposals for visitor attractions and recreational and leisure development will be permitted in 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	++ Include reference to the need for proposals in remote locations to ensure there is no adverse traffic, landscape or biodiversity impacts. See proposed new policy option under transport.
Option 42: To allow for development of shore based facilities in developed stretches of coast which are compatible with the purposes and duty of the National Park Authority adjacent uses and port activities. The development of marinas will not be appropriate in the National Park.	+ Protects the undeveloped coast from development and maintains the character of coastal settlements
Option 48 : Protect against loss of hotels and guesthouses unless it is proven that their continued use would be unviable or that peak demand can continue to be met in the locality.	+ Least likely (of the options considered) to result in the loss of serviced accommodation, with attendant negative effects
Option 51: Do not allow any additional camping, caravanning or chalet pitches in the National Park.	+ Avoids any increase in the negative landscape effects of such sites.
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.	+ Likely to realise landscape benefits in terms of more appropriately designed and sited structures, likely to offer better opportunities for year round tourism.
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.	++ 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.
<b>Overall sustainability Appraisal of Policy</b>	
+	<p>This policy has emerged from options appraised for the Preferred Strategy and considered sustainable.</p> <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</p>

	<p>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>
<b>Recommendation: No change to the policy</b>	
<b>Implications of proposed Focussed Changes to the Plan</b>	
<b>Change</b>	<b>SA Implications</b>
Replace "continues to hold its attraction" with "is conserved and enhanced".	None

<b>Policy 24 (Adopted Plan Policy 36): Loss of Hotels and Guest Houses</b>	
Loss of hotels and guest-houses in the National Park will be permitted where:	
<p>a) the potential for continued use of the facility has been shown to be un-viable; or</p> <p>b) the overall demand for this type of accommodation during peak periods will continue to be met within the area; and</p> <p>c) there is no adverse effect on the appeal and intrinsic character of the resort, area or frontage.</p>	
<b>Policy options appraised for the Local Development Plan Preferred Strategy</b>	<b>Summary of Appraisal</b>
Option 48 : Protect against loss of hotels and guesthouses unless it is proven that their continued use would be unviable or that peak demand can continue to be met in the locality	+ Option least likely to result in the loss of serviced accommodation, with attendant negative effects
<b>Overall sustainability Appraisal of Policy</b>	
+	This policy arises directly from the option investigated for the Preferred Strategy and found at that time to be sustainable
<b>Recommendation: No change to the policy</b>	

<b>Policy 25 (Adopted Plan Policy 37): Self-Catering Development</b>	
Proposals for holiday cottages, flats and other forms of self-catering development will only be permitted where:	
<p>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</p> <p>b) there is no need for affordable housing provision in the area or</p> <p>c) the site or building is not appropriate for affordable housing provision.</p> <p>New build self-catering development on greenfield sites will not be permitted.</p>	
<b>Policy options appraised for the Local Development Plan Preferred Strategy</b>	<b>Summary of Appraisal</b>
Option 56a: Allow self catering accommodation on brownfield sites in the plan's Centres and in conversions in the countryside except where an affordable	++ Avoids the landscape impacts of allowing new build / green field self catering development. Improving visitors facilities may help support local facilities, but



housing need has been identified. In these instances affordable housing provision will be given priority.	prioritising affordable housing where needed ensures that is not at the expense of housing people.
<b>Overall sustainability Appraisal of Policy</b>	
+	This policy arises directly from the option investigated for the Preferred Strategy and found at that time to be sustainable
<b>Recommendation: No change to the policy</b>	

<b>Policy 26 (Adopted Plan Policy 38): Camping, Touring Caravans, Statics and Chalet Sites</b>	
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.	
<b>Policy options appraised for the Local Development Plan Preferred Strategy</b>	<b>Summary of Appraisal</b>
Option 51: Do not allow any additional camping, caravanning or chalet pitches in the National Park.	+ Avoids any increase in the negative landscape effects of such sites.
<b>Overall sustainability Appraisal of Policy</b>	
+	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.
<b>Recommendation: No change to the policy</b>	

<b>Policy 27 (Adopted Plan Policy 39): Upgrading Statics, Touring Sites and Tent Pitches</b>	
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.	
<b>Policy options appraised for the Local Development Plan Preferred Strategy</b>	<b>Summary of Appraisal</b>
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.	+ Likely to realise landscape benefits in terms of more appropriately designed and sited structures, likely to offer better opportunities for year round tourism.
<b>Overall sustainability Appraisal of Policy</b>	
+	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.
<b>Recommendation: No change to the policy</b>	

<b>Policy 28 (Adopted Plan Policy 40): Site Facilities on Tent, Chalet and Caravan Sites</b>	
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.	
<b>Policy options appraised for the Local Development Plan Preferred Strategy</b>	<b>Summary of Appraisal</b>
<b>Overall sustainability Appraisal of Policy</b>	
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.
<b>Recommendation: No change to the policy</b>	
<b>Implications of proposed Focussed Changes to the Plan</b>	
<b>Change</b>	<b>SA Implications</b>
Paragraph 4.133, p56: Amend advice on exceptions to read "Facilities of a larger size and scale may be considered in circumstances where such facilities are lacking in the immediate locality.	None

<b>Policy 29 (Adopted Plan Policy 41): Change of Use from Tent Pitches to Touring Caravan Pitches</b>	
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.	
<b>Policy options appraised for the Local Development Plan Preferred Strategy</b>	<b>Summary of Appraisal</b>
<b>Overall sustainability Appraisal of Policy</b>	
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.
<b>Recommendation: No change to the policy</b>	

<b>Policy 30 (Adopted Plan Policy 42): EMPLOYMENT SITES &amp; LIVE/WORK UNITS (Strategy Policy)</b>
---

<p>Employment opportunities will be provided and safeguarded through:</p> <p>a) Small scale employment opportunities are identified at St Davids.</p> <p>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)</p> <p>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.</p> <p>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)</p> <p>e) Protecting and enhancing the harbours at Tenby, Saundersfoot, Solva and Porthgain. (See Policy 53)</p>	
<b>Policy options appraised for the Local Development Plan Preferred Strategy</b>	<b>Summary of Appraisal</b>
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)	+ 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.
Option 37: Using one of the policy options above, allocate land for business use combined with other uses such as community facilities or housing	++ Mixed developments will help reduce the need to travel, and allow more flexibility in meeting the needs of communities.
Option 38: Protect existing employment sites for employments 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. Use a sequential approach where new uses can be permitted with a preference for reuse for a community use including affordable housing provision.	+ 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
Option 43: To protect the working harbours at Tenby, Saundersfoot, Solva and Porthgain	+ Protects the character of coastal settlements
<b>Overall Sustainability Appraisal of Policy</b>	
+	<p>a &amp; 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>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 later in this document and in</p>

appendix G and the assessment of Policy 53).	
<b>Recommendation: No change to the policy</b>	
<b>Implications of proposed Focussed Changes to the Plan</b>	
<b>Change</b>	<b>SA Implications</b>
Clause c: At end, insert "Employment and mixed allocations listed in Table 3 below are shown on the Proposal Maps."	None
Table 3: Amend the site area of MA776 to 2.29ha for 35 units with a 37% provision of affordable units (13).	The purpose of this extension is to ensure the revenue generated by development of the site is sufficient to pay for significant road development to link with the B4341, while still ensuring the site can deliver the amount of affordable housing required. The expansion of the site is into an area identified in the deposit Local Development Plan as suitable for future growth. Therefore the extension of the site is likely to ensure it remains positive in terms of Sustainability Objective 8, 9 and 10, without having a negative impact in terms of Sustainability Objectives 3 and 14.
<b>Implications of the Inspector's Recommendations</b>	
<b>Inspector's Recommendation</b>	<b>SA Implications</b>
Recommendation 8: Reduce the area of site MA733 to accord with that shown on Map 1 appended to Document NPA79 and adjust Table 3 (following Policy 30) to allow for 40 residential units of which 20 would be affordable housing. The site area in column 3 and the relevant totals will also need to be amended.	The change would result in the allocation of fewer affordable housing units and a corresponding negative effect with regard to Sustainability Objectives 8, 9 & 10. A focussed change was proposed to protect biodiversity on and around this site, and this recommendation is aimed at further increasing that protection, giving a positive effect with regard to Sustainability Objective 14.

<b>Policy 31 (Adopted Plan Policy 43): Protection of Employment Sites and Buildings</b>	
Permission to redevelop, or use, business, general industrial, storage or distribution sites or buildings for other purposes will be permitted where:	
<ul style="list-style-type: none"> <li>a) the present use is inappropriate for the locality; or</li> <li>b) there is adequate alternative provision in the vicinity; or</li> <li>c) the potential for continued use of the site or premises has been shown to be unviable.</li> </ul>	
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.	
<b>Policy options appraised for the Local Development Plan Preferred Strategy</b>	<b>Summary of Appraisal</b>
Option 38: Protect existing employment sites for employments 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. Use a sequential approach where new uses can	+ 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

be permitted with a preference for reuse for a community use including affordable housing provision.	
<b>Overall sustainability Appraisal of Policy</b>	
+	This policy arises directly from the option investigated for the Preferred Strategy and found at that time to be sustainable.
<b>Recommendation: No change to the policy</b>	

<p><b>Policies 32 &amp; 33 (Adopted Plan Policies 44 &amp; 45): HOUSING &amp; AFFORDABLE HOUSING (Strategy Policies)<sup>13</sup></b></p> <p>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.</p> <p>These dwellings will be distributed as follows:</p> <ul style="list-style-type: none"> <li>a) Tenby Local Service and Tourism Centre – approximately 428 dwellings (land already with planning permission 86 dwellings)</li> <li>b) Newport, St Davids, Saundersfoot and Crymych Local Centres – approximately 210 dwellings (land already with planning permission - 109 dwellings)</li> <li>c) Rural Centres and Countryside – approximately 333 dwellings (land already with planning permission 192 dwellings)</li> </ul> <p>A windfall contribution of 250 dwellings is also expected.</p> <p>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.</p> <p>Some sites will require phasing of development – see table below.</p> <p>To deliver affordable housing the National Park Authority will as part of the overall housing provision:</p> <ul style="list-style-type: none"> <li>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%).</li> <li>b) Allow the exceptional release of land within or adjoining Centres for affordable housing to meet an identified local need.</li> <li>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 need in developments of 2 or more residential units will be sought.</li> <li>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)..</li> </ul> <p>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.</p> <p>Where it can be proven that a proposal is unable to deliver (i.e. the proposal would not be</p>
---

<sup>13</sup> 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.

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.	
<b>Policy options appraised for the Local Development Plan Preferred Strategy</b>	<b>Summary of Appraisal</b>
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.	++ 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 64: To seek to achieve a minimum density of 30 dwellings per hectare on housing development in the Centres identified in the Scale and Location of Growth Section.	+ Add safeguard regarding the character of the centre.
<b>Overall sustainability Appraisal of Policy</b>	
+	<p>This policy in part emerges from options considered for the preferred strategy and considered to be positive in sustainability terms.</p> <p>A detailed assessment of the policy as it has developed for the deposit LDP suggests that 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>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. (See the Sustainability Appraisal of Local Development Plan allocations later in this document and in appendix G)</p>
<b>Recommendation: No change to the policy</b>	
<b>Implications of proposed Focussed Changes to the Plan</b>	
<b>Change</b>	<b>SA Implications</b>
Policy 32: Before last sentence insert "Allocations for housing are listed in Table 7 and are shown on the Proposals Map"	None
Amend Table 8 to show the number of units for Land at the east of Marine Road Broad Haven the site as 35 with 35 in Phase 2.	The purpose of this extension is to ensure the revenue generated by development of the site is sufficient to pay for significant road development to link with the B4341, while still ensuring the site can deliver the amount of affordable housing required. The expansion of the site is into an area

	identified in the deposit Local Development Plan as suitable for future growth. Therefore the extension of the site is likely to ensure it remains positive in terms of Sustainability Objective 8, 9 and 10, without having a negative impact in terms of Sustainability Objectives 3 and 14.
Policy 33, new reasoned justification paragraph: Insert a sentence to advise that planning guidance on affordable housing prepared jointly with the County Council will require updating.	None.
Policy 33 & Table 7 HA387: Add HA387 Dinas Cross as a 100% affordable housing allocation	Will ensure that the affordable housing targets in the area are met contributing to Sustainability Objective 8, though the delivery of the affordable housing will be dependent on public subsidy.
Policy 33 & Table 7 HA749: Delete Site HA749.	The affordable housing requirement has been shifted to site HA387, so limiting the negative impact on Sustainability Objective 8.
Appendix 2, Relevant allocations within the adopted plan: Proposed allocations at areas of former mine workings to include coal text at Appendix 2, where relevant – “Technical advice relating to both the investigation of coal and former coal mines and their treatment should be obtained before beginning any works on site. All proposals should apply good engineering practice used in mining areas. No development should be undertaken which intersects, disturbs or interferes with any coal seams, coal mine workings or mine entries without the permission of The Coal Authority, to do so would constitute trespass. Developers should be aware that the investigation of coal seams or coal mine workings may have the potential to generate and/or displace underground gases; and these risks both under and adjacent to the development site should be fully considered in any proposals”.	The requirement for engineering works may increase the cost of a development, reducing its ability to deliver affordable housing or other community benefits. Development may also be precluded in otherwise suitable areas. That said the change seeks to avoid development where that development would be dangerous or result in buildings vulnerable to subsidence or collapse. Therefore the change will be at worst neutral and possibly of slight benefit in sustainability terms.
Appendix 2, Brynhir and Butts Field, Tenby; West of Glasfryn Lane, St Davids: Insert the following text in the following allocations <ul style="list-style-type: none"> <li>- Brynhir and Butts Field, Tenby</li> <li>- West of Glasfryn Lane, St Davids</li> </ul> Please also see options for low and zero carbon renewable technologies available for this site in the Background Paper ‘Housing site Assessment – Options for low and zero carbon technologies’	None.
Appendix 2 - Sites HA 377; HA724; HA752; HA760; HA737; HA825;HA734; HA704; HA559; MA707; MA733; MA232:	Will further ensure impact on Natura 2000 sites is avoided or adequately mitigated against when the site is developed.

<p>Insert into commentary. "Site has been identified as having likely significant effect on Natura 2000 sites and should be subject to Habitat Regulations Assessment."</p>	
<p>Appendix 2, Site MA733: Delete the reference to the proposed access in the north-west corner of the site.</p>	<p>The change is to avoid development in that part of the site used by Otters (a feature of the nearby Pembrokeshire Marine SAC). This allocation has been identified as having likely significant effect on the Pembrokeshire Marine SAC in the Habitat Regulations Assessment, and this change will help ensure there is no adverse impact on the SAC. <b>See also the appraisal of Inspector's Recommendation 8.</b></p>
<p>Appendix 2, Site HA724: Insert into Appendix 2 to read 'The site currently provides some car parking for hotels in the vicinity and the need to address this and satisfy' at beginning of 3<sup>rd</sup> sentence .Delete the words 'The need to satisfy'</p>	<p>None.</p>
<p>Appendix 2, Site MA776: Amend to advise that a green corridor is to be provided along the western boundary of the site linking the open space identified to the north and south of the site. Hedgebanks are to be constructed either side of the path with a 3m wide path between.</p>	<p>This corridor (which will include a footpath) may provide a wildlife link between the areas of scrub to the north and south of the site and have a positive effect with regard to Sustainability Objective 14, though a wider corridor capable of accommodating more vegetation would have greater benefit.</p>
<p>Appendix 2, Sites HA821; HA370; HA436 (Jameston): Include additional wording as follows 'The Environment Agency would object to any new development until the pumping station is upgraded and adopted. This area lies on a Major Aquifer and source protection zone 3'.</p>	<p>Will improve sustainability with regard to Sustainability Objective 15 as it helps ensure that development will not proceed in the absence of adequate capacity in the sewerage system.</p>
<p>Appendix 2, Site HA848: Include the following additional text 'In order to ensure that every opportunity is taken to mitigate the impact and compensate for any loss, the following will be required prior to the development of the site. A tree survey and bat survey, the results of which will guide the scale of development. Any loss of habitat will require compensatory provision in relation to the potential to enhance existing linear features and connectivity at hedgebanks, scrub or field margins within the local area. Such potential is likely to be away from street lighting and less disturbed. It should be noted that a Tree Preservation Order TPO121 is now in place for trees along the eastern boundary of the site'.</p>	<p>Should reduce the impact of this site with regard to Sustainability Objective 14 as any potential negative impacts will be identified and appropriate steps taken. It should be noted that in the event of a survey identifying potential impacts on bat species that are features of Natura 2000 sites, Habitat Regulations Assessment may be necessary.</p>
<p>Appendix 2, Site 895: There is no public sewerage system in this area. Any new development will require the provision of satisfactory alternative facilities for sewage disposal. Alternatively the nearest gravity</p>	<p>Ensures there are no negative impacts as a result of improper disposal of sewage. As such will be positive in sustainability terms, particularly with regard to Sustainability Objective 15.</p>



<p>public sewer in approximately 600 metres from the site both sewerage and sewage treatment capacity may need to be upgraded as a result of the development of this site.</p>	
<p>Appendix 2, Site HA384: Insert the following text into Appendix 2 “Land has not been allocated for a replacement football pitch at Solva. A development brief has previously been prepared by the National Park Authority which demonstrates that this site can accommodate a junior pitch, tennis court and 18 houses. Such facilities will need to be assured as part of this site allocation.”</p>	<p>Ensuring that the sports facilities are retained as part of the development of this site will help ensure that Sustainability Objectives 4 and 13 are met. That the retention of the sports facilities can be achieved without affecting the ability to deliver the proposed number of houses means there will not be negative sustainability effects regarding housing delivery.</p>
<p>Appendix 2, Site HA377: Amendment to Appendix 2 Allocations at HA377 Brynhir, Tenby to include “Access to this site will be via a new access directly onto the A478 to the north”.</p>	<p>None.</p>
<p><b>Implications of the Inspector's Recommendations</b></p>	
<p><b>Inspector's Recommendation</b></p>	<p><b>SA Implications</b></p>
<p>Recommendation 2: Add a footnote, referenced at the end of sub-paragraph (d) of Policy 33, to read ‘The NPA will prepare supplementary planning guidance on the extent of contributions to affordable housing which will be required from single unit developments. The guidance will be completed within 12 months of the adoption of the LDP’.</p>	<p>This Recommendation is to ensure that the requirements of the policy and the way it will be implemented are clearly set out in Supplementary Planning Guidance. It does not change the policy of the Plan and therefore is unlikely to have a significant effect on the sustainability of the outcomes.</p>
<p>Recommendation 3: Add at the end of the penultimate paragraph of Policy 33 (after ‘negotiations’) the following text: ‘provided that it can be demonstrated that the proposal would not unduly overburden existing community infrastructure provision’.</p>	<p>Sustainability Appraisal of the original policy concluded that because affordable housing was likely to be the most pressing need in most communities prioritising it over other community infrastructure would best serve the aims of Sustainability Objectives 8 &amp; 13. This recommendation ensures that when infrastructure needs other than affordable housing are more pressing they are taken into account. In these circumstances not taking them into account could undermine Sustainability Objectives 8 &amp; 13 so this Recommendation will improve the sustainability of the Plan.</p>
<p>Recommendation 4: Change the affordable housing percentage for Site ref HA750 – Crymych in table 7 to 50% and the expected affordable housing provision to 8</p>	<p>The requirement for 100% affordable housing on this site was formulated in the absence of certainty that adequate affordable housing provision would be made elsewhere in Crymych in the area covered by the Pembrokeshire County Council Local Development Plan. Proposals for affordable housing are being considered in the emerging Local Development Plan for the Pembrokeshire County Council Planning area so it is likely that the loss of affordable</p>

	<p>units on this site will be more than made up for by affordable units on sites elsewhere in Crymych, resulting in adequate affordable housing provision in the area and no negative effects with regard to Sustainability Objective 8.</p>
<p>Recommendation 6: Delete sites HA220 and HA609 from the Proposals Map, Inset C23 and from Table 7; adjust the figure in sub-para (b) of Policy 32 from 210 to 195 and remove the entry for site HA220 from Appendix 2.</p>	<p>The reduction in the number of affordable units (partly offset by Recommendation 7) will be negative with regard to Sustainability Objectives 8, 9 &amp; 10, though exploration of the financial viability of providing significant amounts of affordable housing on these sites during the Examination suggested that they may not have delivered much, if any, due to their high existing use value. Delivery of affordable housing on site HA220 would have involved relocation of caravans to an area north of the site with consequential negative landscape impact which will be avoided with deletion of the site.</p>
<p>Recommendation 7: Expand Site HA825 on Proposals Map Inset C23 to take in the areas of Sites Alt1056 and Alt1057, except for that part of Alt1056 which falls within the existing churchyard and adjust Table 7 to allow for 20 residential units of which 14 would be affordable housing. The site area in column 4 and the relevant totals will also need to be amended.</p>	<p>Increasing the number of units on the site (and hence the amount of affordable housing) will have benefits with regard to Sustainability Objectives 8, 9 &amp; 10, partly offsetting the effects of Recommendation 6. The Inspector is satisfied that any traffic or landscape impacts of expanding site HA825 are acceptable and manageable. This site is identified in the Habitat Regulations Assessment as having Likely Significant Effect on a Natura 2000 site (at its size proposed in the Deposit Plan), though Appropriate Assessment concluded that this would not amount to Adverse Impact. The Local Development Plan requires that this site is subject to project level Habitat Regulations Assessment prior to development, and this, together with an overall reduction in development density on the site, should ensure that negative effects on Natura 2000 sites can be avoided.</p>
<p>Recommendation 9: (i) Add a new Key Outcome (2) to Affordable Housing and Housing Provision in Appendix 4 to read 'If by the end of the financial year 2014/15 the number of affordable homes built or under construction is below 80% of the proportion of the overall target for the plan period which should be available by that date, the Authority will immediately commence a review of the Affordable Housing Strategy Policy';  (ii) Change the 'minimum' figure in Key Outcome (1) from 540 to 530;  (iii) Change Key Outcome (2) to (3)</p>	<p>The affordable housing policy is acknowledged as being ambitious and is based on evidence suggesting that the only housing development needed in the National Park is to provide for affordable housing. The sustainability benefits identified for the policy will only be realised if the policy (and the housing) is delivered. Therefore monitoring to ensure that this is happening, and review to address problems if it is not are essential to implementing the policy. Therefore this change is not likely to lead changes in the sustainability of the Plan, but will help ensure that the Sustainability Objectives are met. Any review of the policy will be supported by Sustainability Appraisal of the options for</p>

	<p>taking the policy forward.</p> <p>The reduction in the minimum figure (part ii of the recommendation) reflects the changes in housing numbers contained in Recommendations 4, 6, 7 &amp; 8.</p>
--	--

<p><b>Policy 34 (Adopted Plan Policy 46): Gypsy Sites</b></p> <p>Proposals for gypsy and traveller sites will be permitted where:</p> <p>a) evidence of need to locate or provide transitory arrangements in the area has been identified; and</p> <p>b) the site is well located to serve the needs of gypsy and travellers including the need to access local services; and</p> <p>c) the site has good access to a public road which is safe and direct; and</p> <p>d) the site is flat and suitable for the development and on site services facilities can be adequately provided; and</p> <p>e) the standard of design and layout is acceptable; and</p> <p>f) amenity issues for both residents on the site and neighbouring properties are adequately addressed; and</p> <p>g) the proposal does not cause significant visual intrusion, is sensitively sited in the landscape and satisfactory landscaping is provided</p>	
<p><b>Policy options appraised for the Local Development Plan Preferred Strategy</b></p>	<p><b>Summary of Appraisal</b></p>
<p><b>Overall sustainability Appraisal of Policy</b></p>	
	<p>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)</p>
<p><b>Implications of proposed Focussed Changes to the Plan</b></p>	
<p><b>Change</b></p>	<p><b>SA Implications</b></p>
<p>Delete reference to the site needing to be "flat" in criterion d) and delete criterion e). Delete paragraph 4.172. Use capital letters for Gypsies and Travellers.</p>	<p>None. The landscape protection afforded by criterion g will mean deletion of criterion e has no impact in this regard.</p>

<p><b>Policy 35 (Adopted Plan Policy 47): Low Impact Development Making a Positive Contribution</b></p> <p>Low impact development that makes a positive contribution will be permitted where:</p> <p>a) the proposal will make a positive environmental, social and/or economic contribution with public benefit; and</p> <p>b) all activities and structures on site have low impact in terms of the environment and use of resources; and</p> <p>c) opportunities to reuse buildings which are available in the proposal's area of operation have been investigated and shown to be impracticable; and</p> <p>d) the development is well integrated into the landscape and does not have adverse visual effects; and</p> <p>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</p> <p>f) the proposal will provide sufficient livelihood for and substantially meet the needs of</p>	
--	--

<p>residents on the site; and</p> <p>g) the number of adult residents should be directly related to the functional requirements of the enterprise; and</p> <p>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.</p>	
<b>Policy options appraised for the Local Development Plan Preferred Strategy</b>	<b>Summary of Appraisal</b>
Option 79: Continue with the low impact policy contained in the Joint Unitary Development Plan	+ Appropriate low impact developments will be inherently more sustainable and yield biodiversity and landscape benefits
<b>Overall sustainability Appraisal of Policy</b>	
+	This is the policy of the Joint Unitary Development Plan and the option to continue with it was investigated for the Preferred Strategy and found to be sustainable.
<b>Recommendation: No change to the policy</b>	
<b>Implications of proposed Focussed Changes to the Plan</b>	
<b>Change</b>	<b>SA Implications</b>
Insert the words 'in the countryside' between the word 'development' and 'that' in the first sentence of the policy.	None

<p><b>Policy 36 (Adopted Plan Policy 48): COMMUNITY FACILITIES &amp; INFRASTRUCTURE REQUIREMENTS (Strategy Policy)</b></p> <p>The provision and protection of community facilities will be achieved as follows:</p> <p>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.</p> <p>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.</p> <p>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.</p>	
<b>Policy options appraised for the Local Development Plan Preferred Strategy</b>	<b>Summary of Appraisal</b>
Option 21: With new and extended facilities encourage them where they are well located to meet the community's needs and they must be convenient to public transport, shops and other services where this is required to serve the needs of the user	+ The option 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>Option 22: Continue with the Joint Unitary Development Plan approach in seeking justification for the loss of a community facility.</p> <p>Use a sequential approach where new uses can be permitted with a preference for reuse for affordable housing provision or employment where there is a need and a scarcity of land to provide for such needs.</p>	<p>++ By resisting the loss of community facilities the social Sustainability Objectives will be furthered, without negative implications for other objectives</p>
<p>Option 24: Seek to prioritise benefits to contribute to dealing with the most acute areas of need for National Park communities.</p>	<p>+? 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>
<p><b>Overall sustainability Appraisal of Policy</b></p>	
<p>+</p>	<p>Clauses a and b have emerged from options appraised for the Preferred Strategy and considered sustainable.</p> <p>Clause c expands on Preferred Strategy option 24, which do not give great concern in sustainability terms. The identification of a need to meet specific infrastructure and facility needs arising from the development addresses the broad and shallow concerns in the appraisal of Preferred Strategy option 23. However, the clause could result in significant additional costs associated with a development that may make the development unviable, particularly in combination with a large requirement for affordable housing and high design standards. The impact of this requirement for infrastructure and facilities needs to be considered in the assessment of the viability of the development allocations in the Plan.</p>
<p><b>Recommendation: No change to the policy</b></p>	
<p><b>Implications of proposed Focussed Changes to the Plan</b></p>	
<p><b>Change</b></p>	<p><b>SA Implications</b></p>
<p>Insert after the second sentence of paragraph 4.178: 'With regard to criterion 36b) below commercial viability is a test for commercial enterprises. Issues to be considered when demonstrating how a suitable replacement or enhanced facility is to be made available or showing it is no longer required could include the sale of building to provide funding for a replacement, demonstrating the facility has remained unused over a long period of time despite efforts to secure its re-use including the opportunity for part-time working/opening or, merging with other facilities to maintain viability. Opportunities for public funding to support facilities could also be considered.</p>	<p>Should help the Policy contribute more towards meeting Sustainability Objectives 8, 10 and 13.</p>
<p>At the end of the policy insert " Allocations for community facilities are listed in Table 9 and are shown on the Proposals Map"</p>	<p>None.</p>
<p>Footnote 139 to be amended to include Sustainable Urban Drainage Systems.</p>	<p>None.</p>
<p><b>Implications of the Inspector's Recommendations</b></p>	

Inspector's Recommendation	SA Implications
<p>Recommendation 10: Add 'allotments' to the list of areas where contributions may be sought in footnote 139, referenced from paragraph 4.178.</p>	<p>If allotments are a community facility required as a consequence of a development it is likely that their provision will make the development more sustainable, particularly with regard to Sustainability Objectives 2, 7, and 13. There could be some sustainability concerns, particularly with regard to landscape issues, but this change does not alter the acceptability of allotments in principle, it only identifies and opportunity for funding. Other policies in the Plan would ensure that allotments requiring Planning Permission were not developed where they would have an unacceptable impact on the Special Qualities.</p>

<b>Policy 37 (Adopted Plan Policy 49): RETAIL IN THE NATIONAL PARK (Strategy Policy)</b>	
<p>The retail hierarchy is as follows:</p> <ul style="list-style-type: none"> <li>a) Tenby Town Centre</li> <li>b) Newport, St David's and Saundersfoot District Centres</li> <li>c) Other smaller retail centres</li> </ul> <p>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).</p> <p>Town and District Centre boundaries will help focus investment in the centre, and maintain the townscape.</p>	
<b>Policy options appraised for the Local Development Plan Preferred Strategy</b>	<b>Summary of Appraisal</b>
<p>Option 93: To identify the hierarchy of centres within the National Park, using the classification of centres set out in Annex A of Technical Advice Note 4 'Retailing and Town Centres'. Town Centre – Tenby; District Centres – St David's; Saundersfoot; Local Centres - Newport</p>	<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>Option 95: To draw restricted town and district centre boundaries</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>Option 96: Retain primary retail frontages within Tenby town centre.</p>	<p>+ This option is more likely to retain a range of shopping opportunities within the centre, attracting visitors and make it less likely that</p>

	residents will have to travel to alternative centres for their shopping needs.
Option 98: Make existing centres more attractive places to visit through regeneration	+ 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 102: Resist the loss of facilities so that vacant premises can be taken up by new occupiers [unless they are proven to be no longer viable].	++ This option would make a significant contribution to sustaining, and maintaining distinctive, local communities, and reducing the need to travel for everyday shopping needs.
Option 103: Provide a policy which supports the development of new facilities within rural centres, and at farms which sell local area produce and as appropriate at tourist attractions.	++ This option would make a significant contribution to sustaining, and maintaining distinctive, local communities, and reducing the need to travel for everyday shopping needs.
<b>Overall sustainability Appraisal of Policy</b>	
+	This policy has emerged from options appraised for the Preferred Strategy and considered sustainable.
<b>Recommendation: No change to the policy</b>	

<b>Policy 38 (Adopted Plan Policy 50): Town, District and Local Shopping Centres</b>	
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).	
<b>Policy options appraised for the Local Development Plan Preferred Strategy</b>	<b>Summary of Appraisal</b>
<b>Overall sustainability Appraisal of Policy</b>	
+	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.
<b>Recommendation: No change to the policy</b>	

<b>Policy 39 (Adopted Plan Policy 51): Garden Centres</b>
Sustainability Appraisal of the Pembrokeshire Coast National Park Local Development Plan Adopted Plan September 2010

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).	
Policy options appraised for the Local Development Plan Preferred Strategy	Summary of Appraisal
<b>Overall sustainability Appraisal of Policy (more detail in Appendix A)</b>	
-	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.
<b>Recommendation: The policy is likely to minimise the negative effects of garden centres and should not change.</b>	

<b>Policy 40 (Adopted Plan Policy 52): SUSTAINABLE TRANSPORT (Strategy Policy)</b>	
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).	
Policy options appraised for the Local Development Plan Preferred Strategy	Summary of Appraisal
Option 124: To reduce the need to travel by car by encouraging Pembrokeshire County Council and/or the South West Wales Integrated Transport Consortium to improve public transport services in terms of frequency, period of service and areas served	+ There is no distinction between the appraisal of options 123 and 124. This Authority contributes to public transport and access to the countryside through the Greenways Partnership which should be added to this option
Option 125: To discourage car use through a policy of careful but appropriate traffic and parking management	+/- Would help meet Sustainability Objectives re car use, but might restrict access to the National Park for some people
Option 125a: To resist road improvements unless there is a compelling need demonstrated, reasonable alternatives can be shown to be unavailable, and all practicable mitigation measures can be implemented	++ Likely to be a sustainable option as will reduce the direct environmental damage caused by road schemes, and not promote car use.
Option 126: To ensure that new development is well designed by providing	+ Likely to result in less car use and greater physical activity amongst residents and



appropriate access for vehicles, cyclists and pedestrians.	visitors
Option 128: A Transport Assessment form is completed for all development or redevelopment proposals. A transport assessment will be required for any proposals likely to have significant trip generation or when the National Park Authority has significant concerns about the possible transport impact of the proposed development.	++ This option follows the National Policy set out in Technical Advice Note 18, but sets the criteria for assessment to levels more relevant to the level of development occurring in the National Park and that which can adversely impact the special qualities of the National Park. This policy requires rewording to clarify what would be acceptable in terms of traffic impact
<b>Overall sustainability Appraisal of Policy</b>	
+	This policy in part emerges from options considered for the preferred strategy and considered to be positive in sustainability terms. A detailed assessment of the policy as it has developed for the deposit LDP suggests 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.
<b>Recommendation: No change to the policy</b>	
<b>Implications of proposed Focussed Changes to the Plan</b>	
<b>Change</b>	<b>SA Implications</b>
At the end of Policy 40 advise "Allocations for road and cycle schemes are listed in Table 10 and shown on the Proposals Map.	None.
"see Policy 41" should be in brackets.	None.

<b>Policy 41 (Adopted Plan Policy 53): Impacts of traffic</b>	
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.	
<b>Policy options appraised for the Local Development Plan Preferred Strategy</b>	<b>Summary of Appraisal</b>
Option 126: To ensure that new development is well designed by providing appropriate access for vehicles, cyclists and pedestrians.	+ Likely to result in less car use and greater physical activity amongst residents and visitors
Option 128: A Transport Assessment form is completed for all development or redevelopment proposals. A transport assessment will be required for any proposals likely to have significant trip generation or when the National Park Authority has significant concerns about the possible transport impact of the proposed development.	++ This option follows the National Policy set out in Technical Advice Note 18, but sets the criteria for assessment to levels more relevant to the level of development occurring in the National Park and that which can adversely impact the special qualities of the National Park. This policy requires rewording to clarify what would be acceptable in terms of traffic impact

<b>Overall sustainability Appraisal of Policy</b>	
+	Policy options on this subject were regarded as sustainable, this detailed 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.
<b>Recommendation: No change to the policy</b>	

<b>Policy 42 (Adopted Plan Policy 54): Cycleways</b>	
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.	
<b>Policy options appraised for the Local Development Plan Preferred Strategy</b>	<b>Summary of Appraisal</b>
<b>Overall sustainability Appraisal of Policy</b>	
+	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
<b>Recommendation: No change to the policy</b>	

<b>Policy 43 (Adopted Plan Policy 55): Powerlines and Pipelines</b>	
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.	
<b>Policy options appraised for the Local Development Plan Preferred Strategy</b>	<b>Summary of Appraisal</b>
Option 131: To require all services in new development to be routed using the least obtrusive and damaging location, route or means of provision	+ Will help protect and enhance the landscape
<b>Overall sustainability Appraisal of Policy</b>	
+	This policy arises directly from the option investigated for the Preferred Strategy and found at that time to be sustainable. The Habitat Regulations Assessment concludes that the impact on Natura 2000 sites can only be assessed at project level.
<b>Recommendation: No change to the policy</b>	
<b>Implications of proposed Focussed Changes to the Plan</b>	
<b>Change</b>	<b>SA Implications</b>
End last sentence at "chosen", delete	Raises to question as to what would be

<p>“without damage to the National Park’s special qualities”. Incorporate final requirement of Policy 44 “Where developments...special qualities of the National Park.”</p>	<p>considered acceptably adverse effects. Recommend that both Policy 43, as proposed for re-wording, and 44 refer to permitting development ‘only where compatible with National Park purposes (see Policy 7 and 45).</p>
<p><b>Implications of the Inspector's Recommendations</b></p>	
<p><b>Inspector's Recommendation</b></p>	<p><b>SA Implications</b></p>
<p>Recommendation 11: Add at the end of Policies 43 and 44 an additional paragraph to read: ‘Where it can be demonstrated that proposals are of national significance, applications should be accompanied by technical and financial feasibility studies’.</p>	<p>This change ensures that the opportunities for delivering nationally significant scheme outside the National Park have been fully explored before a proposal to put such development in the Park is made. The difference in sustainability terms is unlikely to be significant, though if the result is that major infrastructure development in the Park is less likely this will benefit Sustainability Objective 3.</p>

<p><b>Policy 44 (Adopted Plan Policy 56): Telecommunications</b></p>	
<p>Telecommunications development will be permitted provided that:</p>	
<p>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.</p>	
<p>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</p>	
<p><b>Policy options appraised for the Local Development Plan Preferred Strategy</b></p>	<p><b>Summary of Appraisal</b></p>
<p>Option 129: To allow telecommunications developments which are part of a planned system of provision and which minimise the impact through mast sharing or innovative use of other structures provided that there are no unacceptably adverse impacts on the character and natural beauty of the National Park.</p>	<p>+ Protects the landscape from the negative impacts of telecommunications development</p>
<p><b>Overall sustainability Appraisal of Policy</b></p>	
<p>+</p>	<p>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. The Habitat Regulations Assessment concludes that the impact on Natura 2000 sites can only be assessed at project level.</p>

**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.**

<b>Implications of proposed Focussed Changes to the Plan</b>	
<b>Change</b>	<b>SA Implications</b>
Delete paragraph 4.209 and first sentence at 4.210.	None. The sections to delete duplicate National policy and guidance.
<b>Implications of the Inspector's Recommendations</b>	
<b>Inspector's Recommendation</b>	<b>SA Implications</b>
Recommendation 11: Add at the end of Policies 43 and 44 an additional paragraph to read: 'Where it can be demonstrated that proposals are of national significance, applications should be accompanied by technical and financial feasibility studies'.	See the response to the Inspector's Recommendation for Policy 43.

<p><b>Policy 45 (Adopted Plan Policy 8): SPECIAL QUALITIES (Strategy Policy)</b></p> <p>The special qualities of the Pembrokeshire Coast National Park will be protected and enhanced.</p> <p>The priorities will be to ensure that:</p> <p>a) The sense of remoteness and tranquillity is not lost and is wherever possible improved – see Policy 46.</p> <p>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.</p> <p>c) The pattern and diversity of the landscape is protected and enhanced – see Policy 50 and Policy 51.</p> <p>d) The historic environment is protected and where possible enhanced</p> <p>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.</p> <p>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.</p> <p>g) Local biodiversity action plan species and habitats are protected for their amenity, landscape and biodiversity value – see Policy 48.</p> <p>h) The Welsh language remains an important component in the social, cultural and economic life of many communities in the Park – see Policy 49.</p> <p>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.</p>	
<b>Policy options appraised for the Local Development Plan Preferred Strategy</b>	<b>Summary of Appraisal</b>
Option 4: Ensure that development within Historic Landscapes, Historic Parks and Gardens maintains or enhances the character of the landscape, parks and gardens or their setting	+ The wording '...development within...' would preclude consideration of development outside a landscape, park or garden that would effect it's setting. The comment accompanying the option includes reference to the impact of agricultural practice, but the wording of the option only covers development, which could

	<p>substantially restrict the impact of the option, particularly in its ability to benefit biodiversity.</p> <p>Currently, this option would give some protection to designated landscapes and also make some contribution towards achieving sustainability goals. However, as above, if we can re-word it to cover wider management, contributions to both plan objective and sustainability goal will be increased – ‘ensure than development within , or impacting upon, Historic Landscapes .... Encourage land management which is sympathetic to the historic sensitivities’.</p>
Option 14: Ensure adequate protection and enhancement of protected species or their habitats, or other habitats, sites and features of importance	+ The option should be reworded to include other (non-protected) species as well. Some of the vertebrate fauna in the Park is protected, but much of the flora and invertebrate fauna is not specifically protected. The option should also be worded to include restoring functioning ecosystems
Option 16: Ensure that development proposals or other human influences do not adversely affect the favourable condition of Geological Conservation Review sites or other important geology	++ Protection of the geological resource does not feature significantly in the Sustainability framework, but protecting the important geology of the National Park is important. This option meets that goal. Should the wording be: ‘... Geological Conservation Review sites <i>and</i> other important geological exposures’
Option 25: insert reference to PPW para 5.7.2	Preferred option is the reference to paragraph 5.7.2 of PPW which concerns itself with the protection of coastal sites within stretches of the developed coast for uses needing a coastal location.
Option 76: Protect the settings of Scheduled Ancient Monuments, as well as the monuments themselves, unscheduled sites and areas of archaeological significance such as Historic Landscapes	+ Need to make it clear what is meant by ‘historic landscapes’ – I think it would be difficult to define except by reference to the Cadw/ICOMOC/CCW register of landscapes. Though with LCA project that’s ongoing at the moment, we may be able to suggest something like ‘ landscapes with exceptional historic value’ (referencing the agree character areas.)
Option 80: To protect the pattern and diversity of the landscape, including its integrity and coherence, and its special qualities and character from development or land use change which would cause damage to it.	++ This option generally supports the achievement of the Sustainability Objectives, though if the option were worded ‘To protect and enhance ...’* this would result in enhanced sustainability gains, particularly with reference to biodiversity. The one sustainability objective that the option might hinder is to reduce the factors contributing to climate change. It is probably unavoidable that a choice must be made between protecting the landscape and allowing those renewable energy

	<p>developments that are likely to have a negative landscape impact. The fact that the Strategic Search Areas for wind energy developments in Wales do not occur in any of the National Parks suggests that in these areas protection of the landscape should take priority over this kind of renewable energy development. We may not be able to expect this for ever – e.g. can NPs be models of sustainability if they are incapable of providing their own electricity?</p> <p>*Perhaps the wording of the purposes would help ('Conserve and enhance...' etc).</p>
Option 81: To conserve and where possible improve the sense of remoteness and tranquillity at locations identified as having a sense of remoteness and tranquillity within the National Park.	+ I wonder if the current wording doesn't debar areas which "should be" remote and/or tranquil from our efforts? '...at locations where tranquillity and remoteness should be ('should be' needs defining) intrinsic to the experience.'
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.
Option 139: To have regard to the need to protect the Welsh language and culture when producing planning policy or dealing with planning applications.	Should help preserve and promote the use of the Welsh language in the National Park
<b>Overall sustainability Appraisal of Policy</b>	
+	<p>This policy is derived from a variety of policy options developed for the preferred strategy all that were found to contribute to the sustainability of the Plan. This policy also provides the framework for meeting the first purpose of the National Park.</p> <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>
<b>Recommendation: No change to the policy</b>	
<b>Implications of proposed Focussed Changes to the Plan</b>	
<b>Change</b>	<b>SA Implications</b>
Insert footnote link in the heading of the Policy which makes reference to Welsh Office Circular 10/99 "Planning requirement in respect of the Use of Non-Mains Sewerage incorporating Septic Tanks in New Development"	None. Reference to National policy.

Reference to the Water Framework Directive to be included as additional points within footnotes at page 14 objectives (Soil, Air and Water Quality) and page 83, Special Qualities, criterion e) to state “The Water Framework Directive (WFD) (2000/60/EC) transposed through the Water Environment (Water Framework Directive) (England and Wales) Regulations 2003”.	None. Reference to National policy.
Clause a: Replace “improved” with “enhanced”.	None.
Clause e: Footnote 148 to also refer to Sites of Special Scientific Interest, National Nature Reserves and Marine Nature Reserves.	None.

<b>Policy 46 (Adopted Plan Policy 9): Light Pollution</b>	
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.	
<b>Policy options appraised for the Local Development Plan Preferred Strategy</b>	<b>Summary of Appraisal</b>
<b>Overall sustainability Appraisal of Policy</b>	
+	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.
<b>Recommendation: No change to the policy</b>	

<b>Policy 47 (Adopted Plan Policy 10): Local Sites of Nature Conservation Interest</b>	
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.	
<b>Policy options appraised for the Local Development Plan Preferred Strategy</b>	<b>Summary of Appraisal</b>
Option 14: Ensure adequate protection and enhancement of protected species or their habitats, or other habitats, sites and features of importance	+ The option should be reworded to include other (non-protected) species as well. Some of the vertebrate fauna in the Park is protected, but much of the flora and invertebrate fauna is not specifically protected. The option should also be worded to include restoring functioning ecosystems.
Option 16: Ensure that development proposals or other human influences do not adversely affect the favourable condition of	++ Protection of the geological resource does not feature significantly in the Sustainability framework, but protecting the

Geological Conservation Review sites or other important geology	important geology of the National Park is important. This option meets that goal. Should the wording be: '... Geological Conservation Review sites <i>and</i> other important geological exposures'
<b>Overall sustainability Appraisal of Policy</b>	
++?	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.
<b>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</b>	
<b>Implications of proposed Focussed Changes to the Plan</b>	
<b>Change</b>	<b>SA Implications</b>
Paragraph 4.222: Add to the reasoned justification at 4.222 'The Local Record Centre records can be particularly useful at pre-application stage and the public are encouraged to contact the centre before an application is submitted. The Authority will use the Local Record Centre to establish whether there is local nature conservation interest at a development site. Where there is local nature conservation interest which would be significantly harmed, the potential for mitigating, satisfactorily minimising or off setting will need to be investigated by the developer and demonstrated to the Authority'. An 'other change' is proposed.	None.

<b>Policy 48 (Adopted Plan Policy 11): Protection of Biodiversity</b>	
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.	
<b>Policy options appraised for the Local Development Plan Preferred Strategy</b>	<b>Summary of Appraisal</b>
Option 14: Ensure adequate protection and enhancement of protected species or their habitats, or other habitats, sites and features of importance	+ The option should be reworded to include other (non-protected) species as well. Some of the vertebrate fauna in the Park is protected, but much of the flora and invertebrate fauna is not specifically protected. The option should also be worded to include restoring functioning ecosystems.
<b>Overall sustainability Appraisal of Policy</b>	
+	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. Though the policy does not specifically consider Natura 2000 sites the Habitat Regulations Assessment concludes that it will help protect these sites.
<b>Recommendation: Delete clause b</b>	
<b>Implications of proposed Focussed Changes to the Plan</b>	
<b>Change</b>	<b>SA Implications</b>
Insert reference to Local Biodiversity Action Plan species and habitats within policy text. To add “including LBAP species and habitats” following “.to wildlife and individual species”.	As well as offering protection to 'protected' species and habitats the policy implies protection of non-protected species and habitats as well. Providing the reference to LBAP species and habitats does not restrict protection to only these species (and ideally makes explicit the consideration of non-protected species) then the change will have at worst no effect with regard to sustainability and may strengthen the policy.

<b>Policy 49 (Adopted Plan Policy 12): Welsh Language</b>	
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.	
<b>Policy options appraised for the Local Development Plan Preferred Strategy</b>	<b>Summary of Appraisal</b>
Option 139: To have regard to the need to protect the Welsh language and culture when producing planning policy or dealing with planning applications	+ Should help preserve and promote the use of the Welsh language in the National Park
<b>Overall sustainability Appraisal of Policy</b>	
+	This policy arises more or less directly from the option investigated for the Preferred Strategy and found at that time to be sustainable.
<b>Recommendation: No change to the policy</b>	

<b>Policy 50 (Adopted Plan Policy 14): Protection of Buildings of Local Importance</b>	
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.	
<b>Policy options appraised for the Local Development Plan Preferred Strategy</b>	<b>Summary of Appraisal</b>
Option 9: Prepare Supplementary Planning Guidance on converting traditional farm buildings	+ This option can provide overall benefits for conservation and enhancement of the landscape, and cultural distinctiveness. The potential to benefit through energy efficiency, re-use of local materials, and sustaining the local community are less certain.
Option 12: Where reuse of historic buildings is proposed, care must be taken to	+ This option will support the genuine conservation of landscape and townscape,

conserve important interior as well as exterior features, whether listed or not.	and reduce the generation of waste. It may however, increase the cost of maintenance, and limit conversion potential.
Option 13: Consider incentives and control mechanisms to guard against the loss of character	+ This option will support the genuine conservation of landscape and townscape, and reduce the incremental loss of features which would undermine its conservation. It could have positive outcomes for the generation of waste
<b>Overall sustainability Appraisal of Policy</b>	
+	Policy options for protection of important buildings were found to be sustainable. This policy is developed from those and 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.
<b>Recommendation: No change to the policy</b>	
<b>Implications of proposed Focussed Changes to the Plan</b>	
<b>Change</b>	<b>SA Implications</b>
Para 4.227, p86: Show historic landscapes, parks or gardens on the Proposals Map. Insert a new policy between paragraphs 4.227 and 4.228 which advises 'Historic landscapes, Parks and Gardens are shown on the Proposals Map'.	Sustainability effects likely to be minimal as change does not effect the level of protection afforded to Historic Landscapes, Parks or Gardens.

<b>Policy 51 (Adopted Plan Policy 15): Conservation of the Pembrokeshire Coast National Park</b>	
Development will not be permitted where these would adversely affect the qualities and special character of the Pembrokeshire Coast National Park by:	
<ul style="list-style-type: none"> <li>a) causing significant visual intrusion; and/or,</li> <li>b) being insensitively and unsympathetically sited within the landscape; and/or</li> <li>c) introducing or intensifying a use which is incompatible with its location; and/or</li> <li>d) failing to harmonise with, or enhance the landform and landscape character of the National Park; and/or</li> <li>e) losing or failing to incorporate important traditional features.</li> </ul>	
<b>Policy options appraised for the Local Development Plan Preferred Strategy</b>	<b>Summary of Appraisal</b>
Option 80: To protect the pattern and diversity of the landscape, including its integrity and coherence, and its special qualities and character from development or land use change which would cause damage to it.	This option generally supports the achievement of the Sustainability Objectives, though if the option were worded 'To protect and enhance ...'* this would result in enhanced sustainability gains, particularly with reference to biodiversity. The one sustainability objective that the option might hinder is to reduce the factors contributing to climate change. It is probably unavoidable that a choice must be made between protecting the landscape and allowing those renewable energy developments that are likely to have a negative landscape impact. The fact that the Strategic Search Areas for wind energy developments in Wales do not occur in any

	<p>of the National Parks suggests that in these areas protection of the landscape should take priority over this kind of renewable energy development. We may not be able to expect this for ever – e.g. can NPs be models of sustainability if they are incapable of providing their own electricity?</p> <p>*Perhaps the wording of the purposes would help ('Conserve and enhance...' etc).</p>
<b>Overall sustainability Appraisal of Policy</b>	
+	<p>Policy options to protect the landscape were judged sustainable at earlier stages of the process. This policy will yield significant sustainability benefits in those areas at which it is targeted.</p>
<b>Recommendation: No change to the policy</b>	
<b>Implications of proposed Focussed Changes to the Plan</b>	
<b>Change</b>	<b>SA Implications</b>
<p>Paragraph 4.236: Amend the last sentence by deleting the words 'and should be considered under this policy' and replace them with 'and the NPA will use same principles as set out in Policy 51 when commenting on proposals outside of the National Park.</p>	<p>None</p>
<p>A new policy is proposed for insertion after paragraph 4.240 advising: "Existing Open Space and Green Wedges are shown on the Proposals Map." Supporting text to this policy will need to advise that National Policy has been applied to reflect the local circumstances of the National Park and its rural nature, as follows 'Green Wedges play an important role in maintaining the landscape setting of urban and rural settlements, and in preserving openness. Pressures for development outside centre boundaries can result in an erosion of the openness and a detrimental effect on the character and special qualities of the rural National Park can result. Such development, alone or cumulatively can have a detrimental impact on the character and landscape of the National Park and provides justification for the designation of green wedges as a local interpretation of national policy.'</p>	<p>Minimal effect as the policy context for green wedges is included in Policy 45 'Special Qualities b), and that for Open Space is national policy.</p>
<p>Paragraph 4.240: Amendment to paragraph 4.240 to acknowledge that the Open Space Assessment has shown that there is a need for pitch space at Moylegrove</p>	<p>Recognition of the need for extra open space at Moylegrove will help meet Sustainability Objectives 4 and 13.</p>
<p>Paragraph 4.240 Amend to advise that there is a need for pitch space in Marloes/Dale.</p>	<p>Recognition of the need for extra open space at Marloes/Dale will help meet Sustainability Objectives 4 and 13.</p>

<b>Policy 52 (Adopted Plan Policy 17): Shore Based Facilities</b>	
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.	
<b>Policy options appraised for the Local Development Plan Preferred Strategy</b>	<b>Summary of Appraisal</b>
Option 42: To allow for development of shore based facilities in developed stretches of coast which are compatible with the purposes and duty of the National Park Authority adjacent uses and port activities. The development of marinas will not be appropriate in the National Park.	+ Protects the undeveloped coast from development and maintains the character of coastal settlements
<b>Overall sustainability Appraisal of Policy</b>	
+	This policy arises directly from the option investigated for the Preferred Strategy and found at that time to be sustainable. The Habitat Regulations Assessment concludes that the impact on Natura 2000 sites can only be assessed at project level.
<b>Recommendation: No change to the policy</b>	

<b>Policy 53 (Adopted Plan Policy 18): Porthgain, Saundersfoot, Solva and Tenby Harbours</b>	
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.	
<b>Policy options appraised for the Local Development Plan Preferred Strategy</b>	<b>Summary of Appraisal</b>
Option 43: To protect the working harbours at Tenby, Saundersfoot, Solva and Porthgain	+ Protects the character of coastal settlements
<b>Overall sustainability Appraisal of Policy</b>	
+	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. 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.
<b>Recommendation: No change to the policy</b>	

5.26 Three new policies have been added to the Local Development Plan as Focussed changes approved by the Inspector. These are (policy numbers refer to those in the adopted Plan):

**Policy 13: Historic Parks and Gardens**

Historic Landscapes, Parks and Gardens are shown on the Proposals Map.

**Policy 16: Open Space and Green Wedges**

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

**Policy 22: Buffer Zones**

Buffer Zones around active and inactive mineral extraction sites are shown on the

proposals map.

These are information policies that were included as supporting text in the Deposit Plan. As such they have no implications for the Sustainability Appraisal.

<b>Implications of proposed Focussed Changes to the Proposals Maps</b>	
<b>Change</b>	<b>SA Implications</b>
Broad Haven C4: Delete site allocation HA704 at the junction of Sandyke Road and Millmoor Way and designate the same area as open space.	It is likely that the housing that would have been provided on this site can be provided on site MA776 Land at Broad Haven north east of Marine Road, so there are no sustainability issues in terms of a loss of affordable housing.
Broad Haven C4: As a consequence Increase site area of allocation east of Marine Road to accommodate up to 35 dwellings.	The purpose of this extension is to ensure the revenue generated by development of the site is sufficient to pay for significant road development to link with the B4341, while still ensuring the site can deliver the amount of affordable housing required. The expansion of the site is into an area identified in the deposit Local Development Plan as suitable for future growth. Therefore the extension of the site is likely to ensure it remains positive in terms of Sustainability Objective 8, 9 and 10, without having a negative impact in terms of Sustainability Objectives 3 and 14.
Little Haven C15: Amendment to the Centre boundary at west of St Brides Road to include the full extent of the footprint of dwelling(s) at St Brides Road .	None.
Marloes C19: Delete the open space designation at Gay Lane Terrace Amenity Area. Marloes.	None. The area was erroneously identified as Open Space.
Marloes C19: It is proposed that: a) the Inspector be advised that the Authority consider that the site shown on Map 3 of Proposed Changes to the Deposit Local Development Plan is considered suitable for use as an exceptions site for affordable housing; and b) that if this is considered appropriate by the Inspector that a consequential amendment to remove the area shown from the wider Green Wedge designation is necessary. This would be an 'other' change.	Modification of the Green Wedge to allow for an exception site for affordable housing would be positive in respect of Sustainability Objectives 8, 9, and 10. Marloes is regarded as an appropriate location in the settlement hierarchy for such development. The area of the former cricket pitch has some biodiversity value, and, if left undisturbed, this value is likely to increase. The area to be excluded from the green wedge has been selected to avoid the most valuable areas so the negative impacts on biodiversity should be minimised, and be acceptable in the light of the social benefits. Development of this area for housing has not been considered as part of the Habitats Regulations Assessment and the requirements of the Habitat Regulations will need to be met if any exceptional land release occurs here. <b>The Inspector rejected the proposal to delete part of the Green Wedge</b> (see the below under

	'Implications of the Inspectors Recommendations').
Newport C23: Amend Map C23 to include Alt1023 Millennium Gardens, Church Street, Newport as open space.	None.
Newport C23: An 'other' change is proposed to include part of site Alt1020 within the Centre boundary for Newport.	The change is to provide alternative opportunities for housing development (with no overall increase in numbers) to site's allocated in Newport, and is therefore unlikely to result in an overall increase in development in the town. therefore there is unlikely to be any significant change in Sustainability compared with the Deposit Plan.
Pontfaen C24: Correctly identify the extent of the Open Space designation at Pontfaen.	None. <b>The Inspector recommended the removal of this open space designation, refer to the appraisal of Inspector's Recommendation 12.</b>
Saundersfoot Map C 26 & C27: Sites at Pennant Avenue (Alt 1027) and West of Pennant Avenue (Alt 1028) should be identified as open space.	None.
St Ishmaels C31: It is proposed that an 'other' change be made to the Plan to remove an area of land from the designated site and the centre boundary, as shown on Map 7 in the Changes Proposed to the Local Development Plan to ensure its protection from development.	The change is to avoid development in that part of the site of most value for biodiversity. Therefore there will be benefits for Sustainability objectives 14 and 2. The area is also used by Otters (a feature of the nearby Pembrokeshire Marine SAC). This allocation has been identified as having likely significant effect on the Pembrokeshire Marine SAC in the Habitat Regulations Assessment, and this change will help ensure there is no adverse impact on the SAC. The allocation site is large enough for this part to be deleted without a reduction in the total number of units, so there will be no negative impacts on social sustainability objectives. <b>See also the appraisal of Inspector's Recommendation 8.</b>
St Ishmaels C31: Identify an area of open space (area of woodland)	If it protects the woodland, will be beneficial in terms of Sustainability Objectives 3 and 14.
Tenby C33: It is agreed that areas of cliff side open spaces should be treated equally and therefore it is proposed that the Plan be amended to show these areas designated as Open Space. The Open Space Assessment background paper will also require updating to take account of this change. An 'other' change to the Plan is proposed.	Will help protect the coastal cliffs and the setting of the town, benefitting Sustainability Objective 2. Benefits with regard to Sustainability Objective 4 will be minimal due to the steep nature of most of the open space identified, but for the same reason any sustainability effects of the loss of development land will also be minimal.
Moylegrove OC14: Delete the open space designation at the former Primary School in Moylegrove.	None. The area was erroneously identified as Open Space.

<b>Implications of the Inspector's Recommendations</b>	
<b>Inspector's Recommendation</b>	<b>SA Implications</b>
<p>Recommendation 5: Retain the area annotated as 'to be deleted from the Green Wedge' on Map 3 of the Proposed Focussed Changes (so that the Proposal map remains as shown on inset C19 of the Deposit LDP)</p>	<p>Explicit provision for an Exception site in Marloes was concluded to yield benefits in terms of Sustainability Objectives 8, 9 &amp; 10. The area proposed for deletion from the Green Wedge was selected to minimise negative effects on biodiversity (Sustainability Objective 14), though development of the area would have had negative landscape impacts, and these might have been greater than if alternative areas of the Green Wedge were developed. National Planning Policy considers affordable housing to meet local needs as acceptable development within a Green Wedge, so this Recommendation does not preclude the development of an Exception site for affordable housing in Marloes. Given this, the Inspector's decision to reject the change to the Green Wedge will not have significant effect with regard to the Sustainability Appraisal. Any effect may be positive as it will allow any negative effects on biodiversity and landscape to be more appropriately balanced and possibly avoided, as there is no longer a 'pre-selected' exception site.</p>
<p>Recommendation 6: Delete sites HA220 and HA609 from the Proposals Map, Inset C23 and from Table 7; adjust the figure in sub-para (b) of Policy 32 from 210 to 195 and remove the entry for site HA220 from Appendix 2.</p>	<p>See the assessment of this Recommendation for Policies 32 &amp; 33.</p>
<p>Recommendation 7: Expand Site HA825 on Proposals Map Inset C23 to take in the areas of Sites Alt1056 and Alt1057, except for that part of Alt1056 which falls within the existing churchyard and adjust Table 7 to allow for 20 residential units of which 14 would be affordable housing. The site area in column 4 and the relevant totals will also need to be amended.</p>	<p>See the assessment of this Recommendation for Policies 32 &amp; 33.</p>
<p>Recommendation 8: Reduce the area of site MA733 to accord with that shown on Map 1 appended to Document NPA79 and adjust Table 3 (following Policy 30) to allow for 40 residential units of which 20 would be affordable housing. The site area in column 3 and the relevant totals will also need to be amended.</p>	<p>See the assessment of this Recommendation for Policies 32 &amp; 33.</p>
<p>Recommendation 12: Remove the open space designation of the land to the east of the Jabes Chapel in Pontfaen from Inset Map C24.</p>	<p>Removal of the open space designation is unlikely to change the status of this area either with regard to development or public access. There are no implications for the Sustainability Appraisal.</p>

- 5.27 Some recommendations made by the Inspector relate to the Plan as a whole rather than specific Policies. The Sustainability Appraisal implications of these are summarised below.
- 5.28 Recommendation 1<sup>14</sup>: The order of Policies in the Plan has no bearing on the weight that should be applied, so this change will have no effect on the implementation of the Plan and hence its performance against the Sustainability Objectives.

---

<sup>14</sup> Relocate paragraphs 4.53 to 4.55 inclusive and Policy 7, together with the heading above paragraph 4.53, to precede the heading 'Spatial Strategy' above paragraph 4.11. Adjust subsequent paragraph numbers and references as appropriate.



## Assessing the cumulative impacts of Plan policies

- 5.29 It is a requirement of Sustainability Appraisal and the Strategic Environmental Assessment Directive that the impacts of Plan policies are assessed in combination with other policies (as opposed to in isolation). These combination effects are of two types:
- cumulative effects - effects that arise due to the addition of the effects of a number of objectives;
  - synergistic effects - those that arise from an interaction of the effects of objectives, and can be thought of as effects that are greater than the sum of the parts.
- 5.30 In some cases an in combination assessment is implicit in the assessment of individual policies, for instance, the policy for housing is considered in the context of the policy for Sustainable Design and the spatial policies of the Plan. Assessing the combined impact of every combination of policies is not a practical option, there are  $4.5 \times 10^{15}$  (45 followed by 14 zeroes) possible combinations of the 52 policies in the Plan.
- 5.31 For the Sustainability Appraisal of the Local Development Plan Preferred Strategy objectives and policy options were combined into five themes and the combined impact across each theme assessed. The five themes are:
- i. objectives and options to protect biodiversity, geodiversity, landscape, and the historic environment;
  - ii. objectives and options to promote visiting and recreation;
  - iii. objectives and options to protect culture and communities;
  - iv. objectives and options to protect the physical environment (both globally and locally);
  - v. objectives and options that recognise the need for development.
- 5.32 Owing to the cross cutting nature of many of the objectives and options an objective or option could appear under more than one theme. For more detail on this assessment please see the Sustainability Appraisal of the Pembrokeshire Coast National Park Management Plan and Local Development Plan Preferred Strategy.
- 5.33 Generally when considered in combination across the themes the combined effects of the objectives will be positive, particularly with respect to the environment, as the environmental protection and enhancement objectives will serve to mitigate or preclude any negative effects of objectives in the other themes. This does however, raise the possibility that the environmental objectives will have negative socio-economic effects, due to restraints they might place on development to meet socio-economic goals.
- 5.34 The significant combined effects of the Plan Objectives and policy options are likely to be:
- i. The interaction of options to protect the environment severely restricting the land available for development, though this is appropriate in the case of a National Park, as this reflects the first purpose of National Parks.
  - ii. Options to attract new users to the Park and to make the Park a more attractive place for recreation combining to significantly increase the recreational use of the Park, which may have negative effects for the environment, particularly biodiversity, and increase the amount of car travel. This lead to a recommendation for the Management Plan and Local

Development Plan Preferred Strategy that policies should define what is appropriate visitor/recreation activity in terms of impact on biodiversity, the wider environment, and car use. Activities which through their scale or nature would adversely impact on the Special Qualities of the National Park should not be promoted and where necessary managed to avoid such impact.

- iii. Some options to sustain communities may require development, together these may make demands for development land that cannot be met within the environmental constraints that are the result of meeting the first statutory purpose of National Parks. Many preferred policy options will prioritise development to meet the need of the local community so that the limited opportunities for development are used most effectively to sustain National Park communities.

5.35 In order to get a better idea of the cumulative impact of Local Development Plan policies on each of the Sustainability Objectives the summary assessment of each policy against each Sustainability Objective was brought into the table below. From this it is possible to read the impact of the Plan as a whole on each Sustainability Objective. A predominance of negative assessments against a Sustainability Objective would suggest that the plan as a whole will have a negative impact on that objective. This approach is not without its flaws, the main one is the implication that a negative effect from one policy can be offset by a positive effect from another. This may be the case, the positive effect could mitigate against the negative effect, or result in gains that more than make up for the losses due to the negative effect. However it could also be the case that a serious negative effect of one policy will not be offset by the positive effects of others. For this reason a commentary follows the table indicating whether or not the positive effects are likely to offset negative effects where these are foreseen.

Impacts by Sustainability Objective of each Local Development Plan policy

Sustainability Objective	Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26
1. (Economically viable agriculture and forestry sectors ...).		0	0	0	0	+	+		0	+/-	0	+	+?	+	0	0	+?	+	+	0	0	+/-	0	0	0	0	0
2. (Decrease the length and number of journeys made by private car ...)		++	++	++	++	-?	-?		0	-	0	0	0	0	0	+	-?+	+?	0	0	0	0	-?	+	0	0	0
3. (Conserve and enhance landscapes, townscapes and seascapes ...)		++	++	++	++	+	+		0	++	+	++	+	+	+	-	0	++	+	+	+	?	-	++	++	++	++
4. (Increase the numbers ... taking part in physical forms of recreation ...)		+	+	+	+	+	0		0	0	0	0	0	0	0	0	0	0	+	0	0	0	+?	+	0	0	0
5. (Increase the number of visitors using the National Park outside the peak visitor season.)		+	+	+	+	0	0		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	++	+	+/-
6. (Manage the effects of climate change ...)		+	+	+?	+	+?	+?		0	+/-	0	0	0	+	0	0	+	++	0	0	+	+?	+	0	0	++	0
7. (Reduce factors contributing to climate change.)		+	+	+	+	-?	-/+		0	+/-	0	+	+	?	0	+	++	++	+	?	0	+	-?	0	0	0	0
8. (Maximise the contribution of ... development to sustaining local communities.)		++	++	++	++	++	++		0	+?	0	?+	0	0	0	0	0	?	0	0	0	+	+?	+	++	++	0
9. (Encourage access for all to the National Park ...)		+	+	+	+	+	+		0	-	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+	+	+/-
10. (Maintain the cultural distinctiveness of communities.)		+	+	+	+	+?	+		0	+	0	+	+	+	0	0	0	+	+?	0	0	+	-	+	++	+	+
11. (The adverse effects of minerals exploitation in the National Park decline ...)		-	-	-	-	-	0		0	-	+	+	+	+?	+	0	0	+	+	+	0	0	0	0	0	0	0
12. (Reduce the negative impacts of waste.)		-	-	-	-	-	-		0	-	0	0	0	+	0	+	++	+	0	+	0	0	0	0	0	0	0
13. Community facilities ... meet the needs of the National Park population		+	+	+	+	+	0/+		0	+/-	0	0	0	0	0	+	0	0?	0	0	0	0	+?	0	0	0	0
14. (Maintain and enhance biodiversity ...)		+	+	+	+	+	+?-		0	+	0	0	+	0	+	0	++	+	+?	?	+	+/-	+	0	-/+	+	-/+
15. (Promote sustainable use of ... inland and coastal waters.)		+	+	+	+	+	+		+?	+	0	0	0	0	0	0?+	0/+	+	0	?	+	0	0	0	0	0	0

Sustainability Objective	Policy	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	
1. (Economically viable agriculture and forestry sectors ...).		0	+	+	0	0	+/-		+	0	0	0	+	0	0	0	0	0	+	0	+	+	0	+	+	0	0	
2. (Decrease the length and number of journeys made by private car ...)		0	+	0	+	0	+		+	++	+	+	-?0	++	+?	++	0	0	?	0	0	0	0	0	0	0	+	0
3. (Conserve and enhance landscapes, townscapes and seascapes ...)		++	0	+	+	+	-		+	+	++	+	-?0	+	+	+	++	++	++	+	+	+	0	++	++	++	+	
4. (Increase the numbers ... taking part in physical forms of recreation ...)		0	0	0	0	0	0		+	+	+	+	+	++	+?	++	0	0	+	0	+	+	0	0/+	+	+	0	
5. (Increase the number of visitors using the National Park outside the peak visitor season.)		++	0	+	0	0	0		+	+	+	+	0	+?-	0	0	0	0	+	0?	+	+	0	0	+	-/+	0	
6. (Manage the effects of climate change ...)		-	0	0	+	+	+		+	+	0	0	-?	+	0	+	0	0	0	0	++	++	0	0	0	+/-	0	
7. (Reduce factors contributing to climate change.)		-	+	-?0	0	0	+		+	+	+	+	-?	++	+	+	0	0	-?	+?	+	+	0	0	0	+/-	0	
8. (Maximise the contribution of ... development to sustaining local communities.)		++	0	0	++	++	++		+	++	++	+	0	0	0	0	0	0	0?	0	0/+	0	0	0	0	0	0	
9. (Encourage access for all to the National Park ...)		+	0	+	0	0	+		+	+	0	0	0	+	0	0?+	0	0	0	0	0	0	0	0	0	0	0	
10. (Maintain the cultural distinctiveness of communities.)		+	0	0	++	?	+/-		+/-	++	++	+	0	0	0/+	0	0	0	+	+	0	0	++	+	+	0	++	
11. (The adverse effects of minerals exploitation in the National Park decline ...)		0	0	0	0	0	-		+	-	0	0	0	+	0	-?+	0	0	+	0	0	0	0	0	+	0	0	
12. (Reduce the negative impacts of waste.)		0	0	0	0	0	-		+	0	0	0	0	0	0	0	0	0	+	0	+	+	0	0	0	0	0	
13. Community facilities ... meet the needs of the National Park population		0	+?	0	+	0	+		0	+	++	+	0	+	0	0	0	0	0?	0	0	0	0	0	0	0	0	
14. (Maintain and enhance biodiversity ...)		-	0	0	+?	++	+?-		+	0	0	0	0	0	+	+	0	0	++	+	++	++?	0	0	0	0	+	
15. (Promote sustainable use of ... inland and coastal waters.)		0	0	0	0	0	+		+	0	0	0	-	0?+	+	+	0	0	+	0	+	+	0	0	0	+	-/+	

The following Sustainability Objectives are worthy of further commentary as they are likely to be subject to negative impacts from more than one plan policy.

### **Sustainability Objective 2**

A number of policies are likely to, or have the potential to, result in increased car use. Policies 5 and 6 regarding development in Rural Centres and the countryside respectively have the potential to increase car use, though the effects of policy 6 are likely to be limited to the restrictive nature of this policy. Policy 9 is likely to result in development in locations where car use is the only practical option in many circumstances. Policy 22 has the possibility for negative effects because coastal roads may not be protected from sea level rise, resulting in a transfer of traffic onto minor roads. In practice, this is unlikely to happen during the lifetime of the Plan. Policy 38 has the potential to increase car use as customers typically travel to garden centres by car as their purchases are likely to be bulky, however the requirement that new garden centres are adjacent to settlements should minimise the effects of this.

That the development proposed in the Local Development Plan is predominantly in the major centres will minimise the impact of the above policies. The sustainable transport policies of the plan will also help ensure that alternatives to the car for travel will be in place, and result in reductions in car use in other areas and activities to offset any increases caused by the policies that might increase car use.

In order to reduce car use development should be restricted to those larger centres where a wide range of services can be accessed without the need for car travel. The problems with regard to this Sustainability Objective stem mainly from the need for development of affordable housing in Rural Centres in order to sustain those centres.

### **Sustainability Objective 3**

Policies 15 (waste management facilities), 22 (flooding/coastal inundation), 32 (Housing) and 38 (garden centres) are predicted to have a negative effect on the landscape of the National Park. The negative effect is the result of the development involved with these policies, though the effect likely to be minimal as allocated sites have been chosen where development will have minimal landscape impact. The requirements of policy 17 (sustainable design) with its requirement to consider place, local distinctiveness and the environment, and policies to protect the Special Qualities of the National Park (particularly policies 44, 49, 50 and 51) will ensure that no development occurs to detriment of landscapes or townscapes, and where possible developments (or conditions attached to the development of a site) enhance the landscape.

### **Sustainability Objective 7**

Policies 5, 22 and 38 have the potential to undermine efforts to reduce factors contributing to climate change due to their potential impact on car use. As stated above the sustainable transport policies of the Plan will help mitigate and offset these effects, and the sustainable design policy (17) will provide other reductions in climate change contributors. Policy 44 may have a negative impact due to the likelihood of it restricting large scale renewable energy schemes. The requirements of policy 17, particularly with regard to renewable energy/low carbon schemes on developments will to some extent mitigate for this by demanding measures to reduce factors leading to climate change where possible. However, it is probably the case that the statutory requirement to protect the landscape of the National Park will prevent the realisation of the full potential renewable energy yield of the area of the National Park

### **Sustainability Objective 11**

There are policies in the Plan (1-5, 9, 32 and 35) to facilitate or direct development. Such development will require mineral resources and therefore these policies could result in increased minerals activity. These minerals could be sourced from less sensitive areas outside the National Park, but that it likely to result in increased transport distances, which

Sustainability Appraisal of the Pembrokeshire Coast National Park Local Development Plan  
Adopted Plan September 2010

would make the activity less sustainable in that respect than sourcing minerals locally. There are policies in the plan to ensure that such minerals extraction that goes on has as little impact as possible, and further policies that promote minerals recycling and more efficient use of minerals on construction sites. However, it is likely that development will have negative impacts with regard to this Sustainability Objective though these are likely to be acceptable in the context of the social gains likely to arise from the development proposed in the Local Development Plan.

### **Sustainability Objective 12**

The policies in the Plan to facilitate and direct development should result in development and in turn this is likely to generate waste during construction and during the lifetime of the development. The amount of waste generated during construction should be minimised by the requirements of policy 17 (sustainable design). It is likely that a significant proportion of the waste generated during the lifetime of the development would have been generated anyway, elsewhere. The requirements of policy 17 and policies 15, 16 and 19 should minimise the waste generated and ensure it is managed in the most sustainable way.

## Sustainability Appraisal of Local Development Plan Allocations

Sustainability Appraisal formed part of the process for evaluating potential development sites for allocation in the Local Development Plan (see Local Development Plan Site Criteria Background Paper). The summary of the appraisal for each allocated site is shown in the table below, detailed Sustainability Appraisal of each of these sites can be found in Appendix G. For some allocations a requirement for project level Habitat Regulations Assessment has been identified in the Habitat Regulations Assessment of the Local Development Plan, this does not mean that other allocations will not need a project level Habitat Regulations Assessment.

Allocation	Summary of Sustainability Appraisal
<b>Community Facility allocations</b> (Local Development Plan Policy 36)	
CP828 Manorbier Station	This development will provide improved access to public transport facilities and sustainable design principles and planting can benefit sustainability objectives
CP829 Land at Saundersfoot Railway Station, Pentlepoir	In overall terms this site will provide for a sustainable approach to accessing public transport. The loss of trees at the site can be mitigated through retention of ecological connectivity and as many of the trees as possible.
<b>Employment and mixed use allocations</b> (Local Development Plan Policy 30)	
MA706 Upper Park Road, Tenby	Redevelopment of this site has the potential to significantly improve the townscape of this part of Tenby. Plan policy to secure as much affordable housing as can be achieved and is needed will help ensure development meets the needs of local communities and offers the opportunity to live in the National Park to as wide a section of the population as possible. The housing built will meet the highest standards for energy efficiency due to the sustainable design policies of the Plan.
MA707 White Lion St/Deer Park, Tenby	Development of this site would enhance the townscape of Tenby. Plan policy to secure as much affordable housing as can be achieved and is needed will help ensure development meets the needs of local communities and offers the opportunity to live in the National Park to as wide a section of the population as possible. The housing built will meet the highest standards for energy efficiency due to the sustainable design policies of the Plan. There is uncertainty regarding effects on the Carmathen 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 should be carried out at project level.
MA710 Sergeants Lane, Tenby	This site is well located for local facilities and redevelopment will help to enhance the townscape of Tenby. Plan policy to secure as much affordable housing as can be achieved and is needed will help ensure development meets the needs of local communities and offers the opportunity to live in the National Park to as wide a section of the population as possible. The housing built will meet the highest standards for energy efficiency due to the sustainable design policies of the Plan.
MA232 Land adjacent to the Business Park, Feidr Pen y Bont	Plan policy to secure as much affordable housing as can be achieved and is needed as opposed to general needs housing will help ensure development aims to meet the needs of local communities. The housing built will meet the highest standards for energy efficiency due to the sustainable design policies of

Allocation	Summary of Sustainability Appraisal
	the Plan. There is potential for effect on the Pembrokeshire Bat Sites and Bosherton Lakes Special Area of Conservation. Habitat Regulations Assessment should be carried out at project level to avoid adverse effects.
MA777 Rear of Cambrian Hotel, Saundersfoot	Already granted planning permission (06/389) and an appraisal is not required.
EA748 South of St Davids Assemblies	The site is within walking distance of a good range of facilities in St Davids and has regular bus services to Haverfordwest and Fishguard. Plan policy to secure as much affordable housing as can be achieved and is needed as opposed to general needs housing will help ensure development aims to meet the needs of local communities. The housing built will meet the highest standards for energy efficiency due to the sustainable design policies of the Plan.
MA746 Between Glasfryn Road and Millard Park, St Davids	The site is within walking distance of a good range of facilities in St Davids and has regular bus services to Haverfordwest and Fishguard. Plan policy to secure as much affordable housing as can be achieved and is needed as opposed to general needs housing will help ensure development aims to meet the needs of local communities. The housing built will meet the highest standards for energy efficiency due to the sustainable design policies of the Plan.
MA776 Land at Broad Haven north east of Marine Road	The site would be well contained at the edge of Broad Haven and is within walking distance of the range of services and facilities the village has to offer. The scale of development that could be accommodated on this site will help to maintain and even improve services. There is a regular bus service to Haverfordwest which will help to reduce the need to use the car. Plan policy to secure as much affordable housing as can be achieved and is needed as opposed to general needs housing will help ensure development aims to meet the needs of local communities. The housing built will meet the highest standards for energy efficiency due to the sustainable design policies of the Plan. <b>The area and number of units for this site has been increased by Focussed Change 39. For the implications for the Sustainability Appraisal of this change see the appraisal for Policy 30.</b>
MA895 Land part of Buttylands, Manorbier Station	Development of this site may help this centre to achieve improved public transport and help to support local facilities. Plan policy to secure as much affordable housing as can be achieved and is needed will help ensure development meets the needs of local communities and offers the opportunity to live in the National Park to as wide a section of the population as possible. The housing built will meet the highest standards for energy efficiency due to the sustainable design policies of the Plan. The retention of trees and ecological connectivity will be essential to the successful development of this site.
MA733 Adjacent to School, St Ishmaels	With the potential for the development of a significant number of units in Herbrandston, St Ishmaels, Dale and Marloes improvement of the bus service to these villages will be required to allow non-car access to a wider range of services and facilities. Plan policy to secure as much affordable housing as can be achieved and is needed as opposed to general needs housing will help ensure development aims to meet the needs



Allocation	Summary of Sustainability Appraisal
	<p>of local communities. The housing built will meet the highest standards for energy efficiency due to the sustainable design policies of the Plan. There is potential for adverse effect on the Pembrokeshire Marine Special Area of Conservation. Habitat Regulations Assessment should be carried out at project level to ensure these effects are avoided. <b>The area and number of units for this site has been decreased by Inspector's Recommendation 8. For the implications for the Sustainability Appraisal of this change see the appraisal for Policy 30.</b></p>
<b>Housing allocations</b> (Local Development Plan Policies 32 and 33)	
HA377 Tenby - Brynhir	<p>This site is within walking distance of a good range of services at Tenby. Plan policy to secure as much affordable housing as can be achieved and is needed will help ensure development meets the needs of local communities and offers the opportunity to live in the National Park to as wide a section of the population as possible. The housing built will meet the highest standards for energy efficiency due to the sustainable design policies of the Plan. There is uncertainty regarding effects on the Carmathen 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. There is potential for effect on the Pembrokeshire Bat Sites and Bosherton Lakes Special Area of Conservation. Habitat Regulations Assessment should be carried out at project level to avoid adverse effects.</p>
HA723 former cottage Hospital Site, Tenby	<p>This site is within walking distance of a good range of services within Tenby. Plan policy to secure as much affordable housing as can be achieved and is needed will help ensure development meets the needs of local communities and offers the opportunity to live in the National Park to as wide a section of the population as possible. The housing built will meet the highest standards for energy efficiency due to the sustainable design policies of the Plan.</p>
HA724 Rectory Car Park, Tenby	<p>This site is within walking distance of a good range of services at Tenby. Plan policy to secure as much affordable housing as can be achieved and is needed will help ensure development meets the needs of local communities and offers the opportunity to live in the National Park to as wide a section of the population as possible. The housing built will meet the highest standards for energy efficiency due to the sustainable design policies of the Plan. There is uncertainty regarding effects on the Carmathen 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 should be carried out at project level.</p>
HA727 West of Narberth Road, Tenby	<p>The site is within Tenby which offers a good range of services and facilities. The site is within a reasonable distance of a bus stop for the town service. This will help to reduce the need to travel by car. Plan policy to secure as much affordable housing as can be achieved and is needed will help ensure development meets the needs of local communities and offers the opportunity to live in the National Park to as wide a section of the population as possible. The housing built will meet the highest standards</p>

Allocation	Summary of Sustainability Appraisal
	for energy efficiency due to the sustainable design policies of the Plan. The site has been highlighted by the Countryside Council for Wales as being included on the Phase 1 vegetation maps. Further investigation is required to assess the contribution that the site makes to biodiversity. It has been included as being appropriate for development pending further investigation.
HA752 Butts Field Car park, Tenby	Development of this site will be restricted to the area of the existing car park to ensure that biodiversity is maintained and habitat not lost. Plan policy to secure as much affordable housing as can be achieved and is needed will help ensure development meets the needs of local communities and offers the opportunity to live in the National Park to as wide a section of the population as possible. The housing built will meet the highest standards for energy efficiency due to the sustainable design policies of the Plan. There is uncertainty regarding effects 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. There is potential for effect on the Pembrokeshire Bat Sites and Bosherton Lakes Special Area of Conservation. Habitat Regulations Assessment should be carried out at project level to avoid adverse effects.
HA760 Reservoir Site, Tenby	The biodiversity value of the site should be fully taken into account, and only part should be developed. Plan policy to secure as much affordable housing as can be achieved and is needed will help ensure development meets the needs of local communities and offers the opportunity to live in the National Park to as wide a section of the population as possible. The housing built will meet the highest standards for energy efficiency due to the sustainable design policies of the Plan. There is potential for effect on the Pembrokeshire Bat Sites and Bosherton Lakes Special Area of Conservation. Habitat Regulations Assessment should be carried out at project level to avoid adverse effects.
HA750 Depot Site, Crymych	This is a brownfield site which offers an opportunity for development which will enhance this edge of Crymych and reduce contamination within the site. The site is within walking distance of a good range of facilities in Crymych. Plan policy to secure as much affordable housing as can be achieved and is needed as opposed to general needs housing will help ensure development aims to meet the needs of local communities. The housing built will meet the highest standards for energy efficiency due to the sustainable design policies of the Plan. <b>Inspector's Recommendation 4 reduces the percentage of affordable housing on this site to 50%. For the implications for the Sustainability Appraisal of this change see the appraisal for Policies 32 &amp; 33.</b>
HA220 Caravan Park off Parrog Road, Newport	Provides housing in a settlement which reduces the need to travel by car. It uses land already in use as a caravan park. Plan policy to secure as much affordable housing as can be achieved and is needed as opposed to general needs housing will help ensure development aims to meet the needs of local communities. The housing built will meet the highest standards for energy efficiency due to the sustainable design policies of

Allocation	Summary of Sustainability Appraisal
	the Plan. <b>This site has been removed from the Plan as a consequence of Inspector's Recommendation 6. For the implications for the Sustainability Appraisal of this change see the appraisal for Policies 32 &amp; 33.</b>
HA609 East of Maes Curig, Newport	The site is within a settlement which reduces the need to travel by car. Plan policy to secure as much affordable housing as can be achieved and is needed as opposed to general needs housing will help ensure development aims to meet the needs of local communities. The housing built will meet the highest standards for energy efficiency due to the sustainable design policies of the Plan. <b>This site has been removed from the Plan as a consequence of Inspector's Recommendation 6. For the implications for the Sustainability Appraisal of this change see the appraisal for Policies 32 &amp; 33.</b>
HA825 North of Feidr Eglwys, Newport	The site is within walking distance of the facilities and services within Newport. The town is on a bus route with regular services to Fishguard and Cardigan which reduces the need to use the car. Plan policy to secure as much affordable housing as can be achieved and is needed as opposed to general needs housing will help ensure development aims to meet the needs of local communities. The housing built will meet the highest standards for energy efficiency due to the sustainable design policies of the Plan. There is potential for effect on the Pembrokeshire Bat Sites and Bosherton Lakes Special Area of Conservation. Habitat Regulations Assessment should be carried out at project level to avoid adverse effects. <b>The area and number of units on this site has been increased by Inspector's Recommendation 7. For the implications for the Sustainability Appraisal of this change see the appraisal for Policies 32 &amp; 33.</b>
HA385 St Davids - North of Twr-y-Felin	The site is within walking distance of a good range of facilities in St Davids and has regular bus services to Haverfordwest and Fishguard. Plan policy to secure as much affordable housing as can be achieved and is needed as opposed to general needs housing will help ensure development aims to meet the needs of local communities. The housing built will meet the highest standards for energy efficiency due to the sustainable design policies of the Plan.
HA737 St Davids West Glasfryn Road, St Davids	The site is within walking distance of a good range of facilities in St Davids and has regular bus services to Haverfordwest and Fishguard. Plan policy to secure as much affordable housing as can be achieved and is needed as opposed to general needs housing will help ensure development aims to meet the needs of local communities. The housing built will meet the highest standards for energy efficiency due to the sustainable design policies of the Plan. There is potential for effect on 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 adverse effects.
HA789 Adj Ysgol Bro Dewi, Nun St, St Davids	The site is contained within the built area of St Davids and the site is within walking distance of the good range of facilities and services within the City. There is a regular bus service to Haverfordwest and Fishguard which reduces the need to use the car. Plan policy to secure as much affordable housing as

Allocation	Summary of Sustainability Appraisal
	can be achieved and is needed as opposed to general needs housing will help ensure development aims to meet the needs of local communities. The housing built will meet the highest standards for energy efficiency due to the sustainable design policies of the Plan.
HA704 Junction of Sandyke Road and Millmoor Way, Broad Haven	The site is within a settlement and residents need not be wholly dependent on a car to access services and facilities. Plan policy to secure as much affordable housing as can be achieved and is needed as opposed to general needs housing will help ensure development aims to meet the needs of local communities. The housing built will meet the highest standards for energy efficiency due to the sustainable design policies of the Plan. There is potential for adverse effect on the Pembrokeshire Marine Special Area of Conservation. Habitat Regulations Assessment should be carried out at project level to ensure these effects are avoided. <b>This site has been removed from the Plan by Focussed Change 82a. For the implications for the Sustainability Appraisal of this change see the appraisal under the section 'Implications of proposed Focussed Changes to the Proposals Maps' following paragraph 5.26.</b>
HA734 South of Driftwood Close, Broad Haven	The site is within a settlement and residents need not be wholly dependent on a car to access services and facilities. Plan policy to secure as much affordable housing as can be achieved and is needed as opposed to general needs housing will help ensure development aims to meet the needs of local communities. The housing built will meet the highest standards for energy efficiency due to the sustainable design policies of the Plan. There is potential for adverse effect on the Pembrokeshire Marine Special Area of Conservation. Habitat Regulations Assessment should be carried out at project level to ensure these effects are avoided.
HA382 Castle Way, Dale	With the potential for the development of a significant number of units in Herbrandston, St Ishmaels, Dale and Marloes improvement of the bus service to these villages will be required to allow non-car access to a wider range of services and facilities. Plan policy to secure as much affordable housing as can be achieved and is needed as opposed to general needs housing will help ensure development aims to meet the needs of local communities. The housing built will meet the highest standards for energy efficiency due to the sustainable design policies of the Plan.
HA387 Dinas Cross - Opposite Bay View Terrace	The site is within walking distance to the limited range of services in Dinas but on a regular bus route to Fishguard and Cardigan. Plan policy to secure as much affordable housing as can be achieved and is needed as opposed to general needs housing will help ensure development aims to meet the needs of local communities. The housing built will meet the highest standards for energy efficiency due to the sustainable design policies of the Plan. The site has been identified as being part of a suite of semi-natural and semi-improved habitats, which makes a contribution to biodiversity within the settlement boundaries. Further exploration of the site is required in the summer months to determine the importance of the contribution of this site. As the site is acceptable in terms of other sustainability appraisal criteria it is classed as being acceptable

Allocation	Summary of Sustainability Appraisal
	for development at the present time. This status may alter following further assessment of the site.
HA749 West of Playing Field, Dinas Cross	<p>The site is within walking distance to the limited range of services in Dinas but on a regular bus route to Fishguard and Cardigan. Plan policy to secure as much affordable housing as can be achieved and is needed as opposed to general needs housing will help ensure development aims to meet the needs of local communities. The housing built will meet the highest standards for energy efficiency due to the sustainable design policies of the Plan. This site comprises semi-improved neutral grassland, surrounded by scrubby field margins. Both habitats support a variety of breeding birds and small mammals. On the seaward side of the informal path alongside the public conveniences the field is dominated by rush pasture, with scrub developing on the margins. Both of these areas are part of a suite of semi-natural and semi-improved habitats in this part of Dinas Cross which make an important contribution to biodiversity within the settlement boundaries. Further exploration of the site is required in the summer months to determine the importance of the contribution of this site. As the site is acceptable in terms of other sustainability appraisal criteria it is classed as being acceptable for development at the present time. This status may alter following further assessment of the site. <b>This site has been removed from the Plan by Focussed Change 42. For the implications for the Sustainability Appraisal of this change see the appraisal for Policies 32 &amp; 33.</b></p>
HA732 East of Herbrandston Hall, Herbrandston	<p>With the potential for the development of a significant number of units in Herbrandston, St Ishmaels, Dale and Marloes improvement of the bus service to these villages will be required to allow non-car access to a wider range of services and facilities. Plan policy to secure as much affordable housing as can be achieved and is needed as opposed to general needs housing will help ensure development aims to meet the needs of local communities. The housing built will meet the highest standards for energy efficiency due to the sustainable design policies of the Plan.</p>
HA436 North of Landway Farm, Jameston	<p>This site may help to improve public transport services, and will help to support local facilities. Plan policy to secure as much affordable housing as can be achieved and is needed will help ensure development meets the needs of local communities and offers the opportunity to live in the National Park to as wide a section of the population as possible. The housing built will meet the highest standards for energy efficiency due to the sustainable design policies of the Plan.</p>
HA730 Opposite Bush Terrace, Jameston	<p>Development of this site may help to improve public transport to this settlement, and will support local facilities as this site is within walking distance of services within Jameston. Plan policy to secure as much affordable housing as can be achieved and is needed will help ensure development meets the needs of local communities and offers the opportunity to live in the National Park to as wide a section of the population as possible. The housing built will meet the highest standards for energy efficiency due to the sustainable design policies of the Plan.</p>
HA821 Green Grove,	Development of this site may help this settlement to achieve

<b>Allocation</b>	<b>Summary of Sustainability Appraisal</b>
Jameston	improved public transport and help to support local facilities. Plan policy to secure as much affordable housing as can be achieved and is needed will help ensure development meets the needs of local communities and offers the opportunity to live in the National Park to as wide a section of the population as possible. The housing built will meet the highest standards for energy efficiency due to the sustainable design policies of the Plan.
HA559 Adjacent Home Farm, Lawrenny	There are currently no realistic alternatives to car travel to access all but the limited services available in Lawrenny. The development of this site may help to support improvements to public transport provision and local facilities. The suitable relocation of existing buildings at the site is key to the potential for this site to be developed. Plan policy to secure as much affordable housing as can be achieved and is needed will help ensure development meets the needs of local communities and offers the opportunity to live in the National Park to as wide a section of the population as possible. The housing built will meet the highest standards for energy efficiency due to the sustainable design policies of the Plan. There is potential for adverse effect on the Pembrokeshire Marine Special Area of Conservation. Habitat Regulations Assessment should be carried out at project level to ensure these effects are avoided.
HA848 Field opp Manorbier VC School, Manorbier Station	Development of this site may help this centre to achieve improved public transport and help to support local facilities. Plan policy to secure as much affordable housing as can be achieved and is needed will help ensure development meets the needs of local communities and offers the opportunity to live in the National Park to as wide a section of the population as possible. The housing built will meet the highest standards for energy efficiency due to the sustainable design policies of the Plan. The retention of trees and ecological connectivity will be essential to the successful development of this site.
HA813 Rear of Cross Park, New Hedges	The site is within walking distance of facilities at New Hedges and has frequent bus services to Tenby where a full range of services is available. Plan policy to secure as much affordable housing as can be achieved and is needed will help ensure development meets the needs of local communities and offers the opportunity to live in the National Park to as wide a section of the population as possible. The housing built will meet the highest standards for energy efficiency due to the sustainable design policies of the Plan. The potential for habitat creation as part of the planning process which would make a contribution to biodiversity.
HA384 Solva - Adjacent to Bro Dawel	The site is within walking distance of a good range of facilities in Solva and on a regular bus route to St Davids and Haverfordwest. Plan policy to secure as much affordable housing as can be achieved and is needed as opposed to general needs housing will help ensure development aims to meet the needs of local communities. The housing built will meet the highest standards for energy efficiency due to the sustainable design policies of the Plan.
HA792 Bank House, Whitchurch Lane, Solva	Plan policy to secure as much affordable housing as can be achieved and is needed will help ensure development meets the needs of local communities and offers the opportunity to live

<b>Allocation</b>	<b>Summary of Sustainability Appraisal</b>
	in the National Park to as wide a section of the population as possible. The housing built will meet the highest standards for energy efficiency due to the sustainable design policies of the Plan. The site is within walking distance of a limited range of facilities and services within Solva but has a regular bus service to St Davids and Haverfordwest where a full range of facilities and services are available. The site is contained within the settlement which reduces the impact of development within the landscape.
HA738 North of Heol Crwys, Trefin	The site is within walking distance to the limited range of services in Trefin but on a regular bus route to Fishguard and St Davids. Plan policy to secure as much affordable housing as can be achieved and is needed as opposed to general needs housing will help ensure development aims to meet the needs of local communities. The housing built will meet the highest standards for energy efficiency due to the sustainable design policies of the Plan.

The evaluation of potential sites for allocation in the Local Development Plan was a sequential process, of which the Sustainability Appraisal was stage 3. The majority of sites deemed unsuitable for allocation were found to be so at stage two, and were not therefore subject to Sustainability Appraisal. Three sites were deemed to be unsuitable following Sustainability Appraisal, the summary of their appraisal is shown below, and more detail can be found in Appendix G. For the full evaluation of each potential site for allocation see appendices 3a and 3b to the Site Criteria Background Paper.

<b>Allocation</b>	<b>Summary of Sustainability Appraisal</b>
388 Rosebush - Near Belle Vue	The site is within a village with extremely limited services. Currently the very irregular bus links do not provide a realistic alternative to the car. Improved public transport to other centres would allow further consideration of this site for development.
853 The Garage, Manorbier	The loss of the commercial garage at this site is a strong consideration albeit that redevelopment would provide additional support for other local services, this service would be lost to the local community
754 Land west of Hilton Crest, Nolton	The site is within a village with extremely limited services. Currently the very irregular bus links do not provide a realistic alternative to the car. Improved public transport to other centres would allow further consideration of this site for development. Plan policy to secure as much affordable housing as can be achieved and is needed as opposed to general needs housing will help ensure development aims to meet the needs of local communities. The housing built will meet the highest standards for energy efficiency due to the sustainable design policies of the Plan.

### Monitoring the sustainability impacts of the Plans

6.1 It is a requirement of the Sustainability Appraisal process and the Strategic Environmental Assessment directive that the significant sustainability effects of implementing the Plan are monitored. This sustainability monitoring in turn forms part of the monitoring framework for the Plans.

6.2 Sustainability Appraisal monitoring should be undertaken for the following reasons<sup>15</sup>:

- i. to identify unforeseen adverse effects and to enable appropriate remedial action to be taken.
- ii. to identify whether the Sustainability Appraisal's predictions of sustainability effects were accurate;
- iii. to identify whether the plan is contributing to the achievement of SA objectives and targets;
- iv. to identify whether mitigation measures are performing as well as expected;
- v. to identify whether any adverse effects are within acceptable limits or whether remedial action is desirable; and
- vi. to fill gaps in existing Sustainability Appraisal baseline information where relevant and manageable.

6.3 The monitoring of the Sustainability Appraisal will take place alongside the monitoring of the Local Development Plan and be published as part of the Annual Monitoring Report for the Local Development Plan. Monitoring of the Sustainability Appraisal and Local Development Plan and publication of the Annual Monitoring Report is the responsibility of the Pembrokeshire Coast National Park Authority.

6.4 The monitoring framework for the Sustainability Appraisal of the Local Development Plan is based on the Sustainability Objectives against which the Plans have been assessed, in order to help understand to what extent these objectives are being achieved. The following table shows the sustainability objectives alongside potential indicators.

**Table 65**

Objectives	Potential indicators
Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	VAT registrations/deregistrations in the agriculture; forestry and fishing sector. Number of farms in agri-environment schemes Conservation status of farmland habitats
Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	Department for Transport statistics for car use by local authority PCNPA car park surveys/ ticket data Pembrokeshire County Council traffic flow data

<sup>15</sup> Welsh Assembly Government (2006) Local Development Plan Manual  
Sustainability Appraisal of the Pembrokeshire Coast National Park Local Development Plan  
Adopted Plan September 2010



<b>Objectives</b>	<b>Potential indicators</b>
	Pembrokeshire County Council public transport figures
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	Mapped landscape quality indicators Condition of listed buildings and Scheduled Ancient Monuments Amount of greenfield and open space lost to development (ha) which is not allocated in the plan.
Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	The activities undertaken by visitors revealed by tourism surveys. Number of volunteer days undertaken for the NPA, numbers from specific groups (e.g. people with disabilities; people with mental health problems). Pembrokeshire County Council National Cycle Network surveys
Increase the number of visitors using the National Park outside the peak visitor season.	Information from businesses PCNPA car park surveys/ ticket data
Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	Conservation status of species believed to be at risk from the effects of climate change. Amount and nature of development in areas at current or future risk of flooding
Reduce factors contributing to climate change.	Modelled emissions of greenhouse gases Indicators relating to car travel
Maximise the contribution of the limited opportunities for development to sustaining local communities.	Percentage of new housing that is affordable.
Encourage access for all to the National Park, reflecting the social mix of society.	The social mix of visitors revealed by tourism surveys.
Maintain the cultural distinctiveness of communities.	Percentage of national retail brands in shopping centres Use of the Welsh language
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.	Number of new/ extensions to minerals sites Number of minerals sites closing/ reducing activity Nature of after-use on closed sites
Reduce the negative impacts of waste.	Amount of waste disposed of to landfill in the National Park and the wider area. Amount of litter recovered in beach tidy events (e.g. MCS beachwatch surveys)
Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	Mapped community facilities and percentage of population living more than specified distances from selected facilities For certain facilities (e.g. doctors) number per head of population Average school class sizes
Maintain and enhance biodiversity both	Conservation status of protected sites, and

<b>Objectives</b>	<b>Potential indicators</b>
within and outside designated sites	key habitats and species (likely to be largely qualitative). Commitments and allocations for development across all Planning Authorities potentially affecting Natura 2000 sites where potential 'in combination' effects have been identified in the Habitat Regulations Assessment of the Local Development Plan <sup>16</sup>
Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	Environment Agency river and coastal water quality measurements. Performance against Water Framework Directive objectives for the surface, ground and coastal waters in or downstream of the National Park.

---

<sup>16</sup> Special Areas of Conservation: Camarthen Bay and Estuaries; North West Pembrokeshire Commons; Pembrokeshire Bat Sites and Bosherton Lakes; Pembrokeshire Marine; St Davids. Special Protection Areas: Carmarthen Bay; Ramsey and St David's Peninsula Coast.

## 8 References and further information

Bowles Green Limited (2005) South West Wales Coastal Recreation Audit - Consultants Report. Available online at <http://library.coastweb.info/701/>

Countryside Council for Wales website. <http://www.ccw.gov.uk/>

Defra (2005) *One future – different paths The UK's shared framework for sustainable development*. Available online at <http://www.sustainable-development.gov.uk/publications/pdf/SD%20Framework.pdf>

European Commission Natura 2000 web pages  
[http://ec.europa.eu/environment/nature/natura2000/index\\_en.htm](http://ec.europa.eu/environment/nature/natura2000/index_en.htm)

European Union (1979) Council Directive of 2 April 1979 on the conservation of wild birds (79/409/EEC). Available online at  
[http://ec.europa.eu/environment/nature/legislation/birdsdirective/index\\_en.htm](http://ec.europa.eu/environment/nature/legislation/birdsdirective/index_en.htm)

European Union (1992) Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora UK Regulations. Available online at  
[http://ec.europa.eu/environment/nature/legislation/habitatsdirective/index\\_en.htm](http://ec.europa.eu/environment/nature/legislation/habitatsdirective/index_en.htm)

European Union (2001) Directive 2001/42/EC of the European Parliament and of the Council (the SEA Directive). Available online at [http://eur-lex.europa.eu/LexUriServ/site/en/oj/2001/l\\_197/l\\_19720010721en00300037.pdf](http://eur-lex.europa.eu/LexUriServ/site/en/oj/2001/l_197/l_19720010721en00300037.pdf)

Great Britain. Parliament (2004) *Welsh Statutory Instrument 2004 No. 1656 (W.170). The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004*. Available online at <http://www.opsi.gov.uk/legislation/wales/wsi2004/20041656e.htm>

Great Britain. Parliament (2004) *Planning and Compulsory Purchase Act 2004*. Available online at <http://www.opsi.gov.uk/acts/acts2004/20040005.htm>

Joint Nature Conservation Committee web site <http://www.jncc.gov.uk/>

National Assembly for Wales (2000) *Wales: Changing Climate, Challenging Choices*. Available online at [http://www.bangor.ac.uk/ies/Research/JF\\_climate\\_tech\\_report.pdf](http://www.bangor.ac.uk/ies/Research/JF_climate_tech_report.pdf)

ODPM (2005) *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents*. Available online at [http://www.communities.gov.uk/pub/346/SustainabilityAppraisalofRegionalSpatialStrategiesandLocalDevelopmentDocuments\\_id1161346.pdf](http://www.communities.gov.uk/pub/346/SustainabilityAppraisalofRegionalSpatialStrategiesandLocalDevelopmentDocuments_id1161346.pdf)

ODPM (2005) *A Practical Guide to the Strategic Environmental Assessment Directive*. Available online at [http://www.communities.gov.uk/pub/290/APracticalGuidetotheStrategicEnvironmentalAssessmentDirective\\_id1143290.pdf](http://www.communities.gov.uk/pub/290/APracticalGuidetotheStrategicEnvironmentalAssessmentDirective_id1143290.pdf)

PCNPA (2003) *Pembrokeshire Coast National Park Management Plan 2003-2007*. Available online at [http://www.pcnpa.org.uk/PCNP/live/sitefiles/related\\_items/NPMP.pdf](http://www.pcnpa.org.uk/PCNP/live/sitefiles/related_items/NPMP.pdf)

PCNPA (2007) Scoping Report for the Sustainability Appraisal of the Pembrokeshire Coast National Park Local Development Plan (2006-2021). Available online at <http://www.pcnpa.org.uk/website/default.asp?SID=1353&SkinID=5>

PCNPA (2007) Scoping Report for the Sustainability Appraisal of the Pembrokeshire Coast National Park Management Plan (2008-2012). Available online at <http://www.pcnpa.org.uk/website/default.asp?SID=1174&SkinID=5>

PCNPA (2007) Habitats Regulations Assessment (Appropriate Assessment) Report Pembrokeshire Coast National Park Local Development Plan Sustainable Development Commission website - [www.sd-commission.org.uk](http://www.sd-commission.org.uk)

SEA-info.net (information on all aspects of Strategic Environmental Assessment) - <http://www.sea-info.net/>

The Planning Inspectorate (1998) Report into Duly Made Objections to the Pembrokeshire Coast National Park Local Plan Deposit Draft

The Planning Inspectorate (2005) Inquiry into the Joint Unitary Development Plan for Pembrokeshire - Inspectors Report

Welsh Assembly Government *Starting To Live Differently. The Sustainable Development Scheme of the National Assembly for Wales*. Available online at <http://new.wales.gov.uk/about/strategy/strategypubs/sustainscheme?lang=en>

Welsh Assembly Government (2004) *Review of the National Park Authorities in Wales*. Available online at <http://www.countryside.wales.gov.uk/fe/master.asp?n1=366&n2=679&n3=335>

Welsh Assembly Government (2005) *Local Development Plans Wales*. Available online at <http://new.wales.gov.uk/about/departments/depc/epcpublications/PlanPubs/Devplans/LDPWales?lang=en>

Welsh Assembly Government (2006) Draft Annex to Technical Advice Note (TAN) 5, Nature Conservation and Planning. Available online at <http://new.wales.gov.uk/consultations/closed/plancloscons/1207763/?lang=en>

Welsh Assembly Government (2006) *Local Development Plan Manual*. Available online at [http://new.wales.gov.uk/docrepos/40382/4038231121/403821/03821/403829/520887/LDP\\_Manual\\_Eng\\_with\\_binders.pdf?lang=en](http://new.wales.gov.uk/docrepos/40382/4038231121/403821/03821/403829/520887/LDP_Manual_Eng_with_binders.pdf?lang=en)

World Commission for Environment and Development (1987) *Our Common Future*, Oxford: Oxford University Press