

## REPORT OF THE HEAD OF DEVELOPMENT PLANS

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### **SUBJECT: RESPONSE TO THE DRAFT SUPPLEMENTARY PLANNING GUIDANCE TO THE PEMBROKESHIRE COAST NATIONAL PARK LOCAL DEVELOPMENT PLAN**

**Purpose of Report:** The purpose of this report is to advise Members of the response received on the above consultation and to ask Members to adopt the guidance for development management purposes subject to the Officer recommended changes.

**Background:** The following Supplementary Planning Guidance was approved for public consultation by the National Park Authority on 8<sup>th</sup> December 2010. The consultation began on 2<sup>nd</sup> February 2011 and ended on 27<sup>th</sup> April 2011 at 5pm.

1. Loss of Hotels
2. Planning Obligations
3. Landscape Character Assessment
4. Sustainable Design
5. Building Extensions
6. Safeguarding Mineral Zones
7. Land Instability from former coal workings
8. Parking
9. Historic Enforcement

An estimated 1,800 letters were sent to various consultees. These included Agents, Architects, Town and Community Councils within the Park, Housing Associations, Estate Agents, Developers, Local Community Groups, local AM's and MP's, County Councillors, Utilities, Chambers of Trade, Environmental Groups, Government agencies, and other people who had expressed an interest.

Letters and CD copies of the consultation documents were provided to libraries within Pembrokeshire, St Clears and Cardigan. They were also available at the National Park centres in Newport, St David's and Tenby in this format. Paper copies of the documents were available to view at the National Park Offices in Llanion Park, Pembroke Dock.

The consultation was advertised via the Authority's web site and via a public notice within the Western Telegraph which appeared in the 2<sup>nd</sup> February 2011 edition along with a press release.

A total of 11 individuals and organisations responded. 43 individual comments were made.

**Main issues:** The main issues raised by the consultation are set out and responded to in Appendix A. Appendix B provides a detailed printout of the representations

made and Officer recommended responses. Appendix C sets out some Officer recommended edits. Appendix D shows all the resultant proposed changes to the draft Supplementary Planning Guidance (relevant pages only). Please note that, due to time constraints, the changes to the Landscape Character Guidance in terms of updates from the Countryside Council for Wales and the Buildings Extensions Guidance are not included. Delegated powers are requested to carry out these amendments.

### **Recommendation**

**A. That the following Supplementary Planning Guidance to the Pembrokeshire Coast National Park Local Development Plan be adopted for development management purposes subject to the amendments set out in Appendix A, B and C:**

- 1. Loss of Hotels**
- 2. Planning Obligations**
- 3. Landscape Character Assessment**
- 4. Sustainable Design**
- 5. Building Extensions**
- 6. Safeguarding Mineral Zones**
- 7. Land Instability from former coal workings**
- 8. Parking**
- 9. Historic Enforcement**

**B. That the Head of Development Plans be given delegated powers to amend the Landscape Character Assessment Guidance to include updates from the Countryside Council for Wales as described in Appendix C and the Extensions Guidance as described in Appendix A.**

### **Background Documents**

Pembrokeshire Coast National Park Local Development Plan Adopted September 2010

Draft Supplementary Planning Guidance on:

1. Loss of Hotels
2. Planning Obligations
3. Landscape Character Assessment
4. Sustainable Design
5. Building Extensions
6. Safeguarding Mineral Zones
7. Land Instability from former coal workings
8. Parking
9. Historic Enforcement

Planning Policy Wales Edition 4 February 2011

Responses to the Supplementary Planning Guidance consultation

*(For further information, please contact Martina Dunne on ext 4820)*

## Appendix A: Supplementary Planning Guidance Main Issues and Proposed Response

This report provides a summary of comments made and an Officer response.

### Loss of Hotels

1.1 In summary there were issues raised about:

- The length of time necessary for a marketing strategy;
- Evaluation of a marketing strategy as a means of assessing viability;
- The need to expand the scope of the Supplementary Planning Guidance to cover public houses;
- Financial difficulties with operating hotels and guest houses;
- Interference of planning policy;

#### Officer Response:

1.2 There were a range of responses about the appropriate length of time to market a hotel business as a going concern. Whilst many thought that 2 years is too long, others considered it to be just right and some not long enough. On balance Officers consider that taking into account that it is a specialised market, two years is a reasonable period during which the market is tested by the changing seasons and possibly other factors such as weather or external factors which alter the market, also taking into account the personal needs and requirements of the owners.

1.3 Respondents commented that the success or otherwise of hotel and guest house businesses related to a variety of factors including the management, supply and demand, quality of the product and publicity. None of this is disputed, but the marketing of a business as a going concern will be marketed on the worth of the business at the time, taking into account all of these factors and more.

1.4 Supplementary Planning Guidance is based on particular policies within the Local Development Plan. The loss of community facilities is of concern to the Authority and there is a separate policy within the Plan to help prevent unnecessary loss. The need to provide supplementary planning guidance for facilities such as public houses can be provided separately if necessary. This issue would merit further discussion.

1.5 There were several comments relating to matters outside planning control such as the need for the National Park Authority to support business through advertising and campaign to central government to lower VAT for accommodation providers.

1.6 There were also several comments relating to the policy approach set out in the Local Development Plan. Changes to the policy cannot be made at this stage, but would be considered, if necessary as part of the Plan monitoring and review process.

### Planning Obligations

1.7 There was only one issue raised as to whether leisure venues were included in the obligations.

#### Officer Response:

1.8 This is not currently proposed although the Policy context would not preclude its inclusion in the future.

### Landscape Character Assessment

1.9 Several issues were raised

- Talbenny should be shown on Landscape Character Area 9 (Marloes Peninsula)
- The Landscape Character Area boundaries should follow community boundaries

- Points of detail and accuracy
- The lighting of Tenby harbour should be enhanced
- The tone of the document does not reflect the close working relationship established with the Ministry of Defence

**Officer Response:**

1.10 Talbenny is identified on the Landscape Character Area map but it is difficult to read at this scale of mapping. The size of the text is part of the Ordnance Survey base map and cannot be altered. The boundaries for the Landscape Character Area follow the areas of identifiable landscape character and cannot be amended to follow community areas. Lighting within Tenby harbour is under the control of Pembrokeshire County Council. The supplementary planning guidance considers the landscape impact of activities but does not cover the public benefit of these activities beyond landscape issues. Whilst excessive detail is avoided to make the document readable, amendments can be made in response to Ministry of Defence comments. For example, text can be included on the date the Castlemartin range was established; the word 'insensitive' at page 25 can be deleted; text can be re-worded in relation to firing noise, the range trail and the notified extension to the Castlemartin Range Site of Special Scientific Interest. Additional management guidance can also be included.

Sustainable Design
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1.11 The main issues were raised:

- The guidance requires a full revision.
- The guidance fails to make explicit reference between sustainable design and design compatible with national park purposes.
- The guidance fails to identify the close relationship between people and nature.

**Officer Response:**

1.12 The guidance was reviewed prior to consultation to ensure it remained relevant. It was only recently prepared and a full revision is not considered necessary.

1.13 The guidance, in my opinion, strikes the right balance in terms of coverage of different aspects of sustainable design within the context of respecting National Park purpose.

Building Extensions
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1.14 The main issues raised were by Officers operating a pilot scheme on extension applications received. With the help of Projects and Development Management the feedback at the time of writing this report has been that:

- The guidance/form requires simplifying, for example not all the items need a comments box.
- Greater distinction is needed between discretionary and mandatory improvements.
- Areas of the guidance/form require clarification, for example where the building includes storage heaters and that the guidance relates to the existing building rather than the extension.
- Move soakaways and cavity wall insulation to the discretionary list.

**Officer Response:**

1.15 Amend the guidance and forms as suggested. As the feedback on the pilot scheme was not available in time to show the changes to the guidance and forms in Appendix D delegated powers are requested to make these changes.

Parking Guidelines
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1.16 One issue was raised:

- A separate category to cover the use of dwellings as holiday homes/lets was suggested.

**Officer Response**

1.17 Houses used as holiday homes or lets are not distinguished in land use planning terms from those permanently occupied and planning permission is not required to change a permanent dwellings into a holiday home or letting property. Where permission is given for dwellings or self-catering accommodation the appropriate standards would be applied.

Safeguarding Mineral Zones Land Instability from former Coal Workings Historic Environment (Archaeology)
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1.18 No substantive issues were raised.

## Appendix B

### Representations received during consultation on SPG commenced in January 2001 and closed on 27 April 2011, with officer responses, grouped by SPG

#### Loss of Hotels and Guesthouses in the Pembrokeshire Coast National Park

788 Mrs Alison Belton, Pembrokeshire Tourism

Marketed for a period of two years. Do you feel that this period is too long/not long enough?

Comments

Seems to much, but not really my area of expertise.

A year would be enough or the danger is people will just give up in the meantime and go away or go bust.

#### Officer Response

Two years is considered to be a reasonable marketing period which allows for a change of seasons and varied marketing conditions. The Authority is asking for a realistic marketing strategy based on sound advice. A sound marketing strategy will be based on the sale of the business as a going concern and not just on bricks and mortar. A business doing less well will inevitably attract a lower price. No change is recommended.

788 Mrs Alison Belton, Pembrokeshire Tourism

Marketed for a period of two years. Do you feel that this period is too long/not long enough?

Comments

"On the assumption that a premises is failing to make adequate returns.

An enforced two year trading period during which the business may be starved of resources may lead to a downward spiral in both quality of service and physical upkeep. This will do nothing to enhance the reputation and market positioning of the local tourism product."

#### Officer Response

Two years is considered to be a reasonable marketing period which allows for a change of seasons and varied marketing conditions. The Authority is asking for a realistic marketing strategy based on sound advice. A sound marketing strategy will be based on the sale of the business as a going concern and not just on bricks and mortar. A business doing less well will inevitably attract a lower price. No change is recommended.

788 Mrs Alison Belton, Pembrokeshire Tourism

Marketed for a period of two years. Do you feel that this period is too long/not long enough?

Comments

Minimum two years for actively marketed businesses, over that when the business is in decline and not being marketed.

#### Officer Response

Two years is considered to be a reasonable marketing period which allows for a change of seasons and varied marketing conditions. No change is recommended.

788 Mrs Alison Belton, Pembrokeshire Tourism

Marketed for a period of two years. Do you feel that this period is too long/not long enough?

Comments

The condition of the market at the time will dictate saleability.

**Officer Response**

Two years is considered to be a reasonable marketing period which allows for a change of seasons and varied marketing conditions. No change is recommended.

**788 Mrs Alison Belton, Pembrokeshire Tourism**

Marketed for a period of two years. Do you feel that this period is too long/not long enough?

Comments

Depends on owners circumstances.

**Officer Response**

Two years is considered to be a reasonable marketing period which allows for a change of seasons and varied marketing conditions. No change is recommended.

**788 Mrs Alison Belton, Pembrokeshire Tourism**

Marketed for a period of two years. Do you feel that this period is too long/not long enough?

Comments

This all depends on the quality of the marketing. 2 years is enough to get a business up and running if the business is innovative and imaginative and the marketing it is correctly targeted, high quality and focused.

**Officer Response**

Two years is considered to be a reasonable marketing period which allows for a change of seasons and varied marketing conditions. No change is recommended.

**788 Mrs Alison Belton, Pembrokeshire Tourism**

Marketed for a period of two years. Do you feel that this period is too long/not long enough?

Comments

The phrase 'marketed' is a little vague. Marketing efforts are often a restraint of budget. A failing business will have less budget so less marketing scope. Is there a base line for marketing efforts within the stated period?

**Officer Response**

There are inevitable costs associated with selling a business. It appears that this respondent has confused the marketing of the business for sale with publicity to attract customers to the business. No change is recommended.

**788 Mrs Alison Belton, Pembrokeshire Tourism**

"I think the planning department needs to humanize and take each application as it comes in with some degree of understanding of the psychological and emotional effect (as well as financial) of some of their decisions.

I am puzzled sometimes by seeing what they do let get through in comparison to what gets stopped. It does not seem to be consistent. I can think of two instances where substantial

properties were allowed in a position where I would have expected a veto.

Pembrokeshire is a difficult place to run a business in and the emphasis is on tourism to keep the young here and in work. We need more flexibility as a county if this is to happen."

**Officer Response**

These comments express the opinions of the respondent but are not relevant to the content of the supplementary planning guidance. No change is needed.

**788 Mrs Alison Belton, Pembrokeshire Tourism**

Marketed for a period of two years. Do you feel that this period is too long/not long enough?  
Comments

"About right. However owners can put too high a value on it, so there is no interest making this 'Evidence' unrealistic."

**Officer Response**

Comments noted. No change is needed.

**788 Mrs Alison Belton, Pembrokeshire Tourism**

Marketed for a period of two years. Do you feel that this period is too long/not long enough?  
Comments

Just right.

**Officer Response**

Comment noted. No change needed.

**788 Mrs Alison Belton, Pembrokeshire Tourism**

"We might have lost some Bed spaces in Guest Houses, B&B's and Hotels in the last few years, and this is mainly because of the COST> of new fire regulations, alarm systems, fire doors, Health and safety issues, risk assessments and all the other new laws implemented.

Also the knowledge and cost of (IT) adverting on-line.

We even have to pay for our own brown signs!

Most of the bed places lost have been replaced with holiday lets, self catering accommodation.

Has a comparison been done by anybody? What are the figures?

Some people operate summer only, so what will happen to the guest houses, B&B's that only open in the summer. They cannot be included in the Parks plans,(or can they) but how many extra bed spaces do they provide?

I come back to the point made earlier it is not the Parks money invested in this, it should be market driven. The Parks should not be interfering, the council have a planning department for change of use, do the Parks want to override this."

**Officer Response**

These comments express the opinions of the respondent but are not relevant to the content of the supplementary planning guidance. For information the National Park Authority and not Pembrokeshire County Council is the planning authority within the National Park area. No change is needed.

**788 Mrs Alison Belton, Pembrokeshire Tourism**

We are lucky to live and work in Pembrokeshire. We need to try and conserve what we have that makes us special and different. We need to go for quality where possible and we do not want to follow the route taken by some resorts that have ceased to operate as holiday destinations and have become dumping grounds for the unemployed, through the greed of some landlords.

#### **Officer Response**

These comments express the opinions of the respondent but are not relevant to the content of the supplementary planning guidance. No change is needed.

#### **788 Mrs Alison Belton, Pembrokeshire Tourism**

Originally 15 years ago this property had the farm house as well as where we are now. After foot and mouth we decided after all the worry we would sell off the farm house and relocate to the accommodation block behind so we now have 8 bedrooms, 4 for guests and it has worked much better for us. Now when we decided to do this it was with the knowledge that at the time this building could have planning for two bungalows great for when we retire - will we still be able to do this or will we HAVE to move whether we want to or not?

#### **Officer Response**

Planning permission would be required for a change of use of self-catering accommodation to residential accommodation and this would be subject to the planning policies in place at the time an application was made. These comments are not relevant to the content of the supplementary planning guidance. No change is needed.

#### **788 Mrs Alison Belton, Pembrokeshire Tourism**

"It could be argued that in many cases failing businesses may be a reflection of over-capacity. If capacity is taken out of the market, more successful businesses may see increased occupancy as they take up the slack. Increased occupancy will generate resources for the upkeep, improvement and marketing of the accommodation product on offer. I question whether WTB (which no longer exists!) peak occupancy statistics (3.4) are of any use as a comparative measure in this context. Peak season occupancy is an exception to normal trading patterns which occurs over a comparatively short period and will give a misleading picture of capacity or the lack of it. In the real world it is the trading picture over the whole year that is relevant, especially through the seasonal shoulders and the winter months where over-capacity may become apparent. And, however well intentioned, occupancy statistics rely on fairly cursory data collection and should not be regarded as precise."

#### **Officer Response**

Peak capacity, although a short length of time is a very important part of the tourism season. This is the time when businesses have most of their trading. During the quieter times some businesses close completely, therefore reducing the number of spaces available. The consequences of not being able to supply for peak capacity would be that visitors would chose alternative accommodation, alter the time of their visit or go elsewhere. Analysis is undertaken for every proposal for the closure of serviced accommodation received by the National Park Authority and even using the peak demand statistics there are very few occasions when demand would outstrip supply. There have been very few statistical alternatives available to use, other than the Visit Wales figures. Should more accurate statistics become available then the Authority will investigate the potential to use them as a means of gauging capacity issues. It is noted that the text still refers to the Welsh Tourist Board and this is proposed for amendment as an update in Appendix C. No change is recommended.

**788 Mrs Alison Belton, Pembrokeshire Tourism**

"I feel it is important to retain as many hotels & guesthouses as possible as they give tourists a chance of sampling Pembrokeshire without committing to any single venue.

Well over 50% of hotel bed spaces between St. Davids and Milford Haven on the coast path have been lost in the last 15 years."

**Officer Response**

These comments express the opinions of the respondent but are not relevant to the content of the supplementary planning guidance. No change is needed.

**788 Mrs Alison Belton, Pembrokeshire Tourism**

Is there any research being done into the source of the problem - why so many hotels/guest houses and seeing the need to sell or go to residential? Perhaps there needs to be more focus on helping businesses like this instead of standing in the way of them closing down if they are unviable.

I think that people who wish to set up hotels and bed and breakfasts should be encouraged particularly if it is not in main tourist towns like Tenby etc. At present the time it has taken for the consultation and redevelopment of the burnt out shell of the hotel overlooking the North Beach does not bode well for anyone wishing to redevelop. I think that rather than building luxury flats say in Tenby planners and National Parks should reflect on Pembrokeshire being the second best Coastal destination and look at what facilities we can provide to improve quality of accommodation and what is on offer in towns for things to do on rainy days. There should be a re evaluation of business rates for shops. It seems crazy nowadays that there has been no thought to not for example having a modern cinema behind the facade of the old cinema.

**Officer Response**

These comments express the opinions of the respondent but are not relevant to the content of the supplementary planning guidance. No change is needed.

**788 Mrs Alison Belton, Pembrokeshire Tourism**

I cannot say how much I dislike policies that try to stop things, especially inevitable things. CAMRA is always producing these - sometimes the double negative - trying to stop brewers who want to close their brewery and retire. Policies should focus instead on the positives - trying to help keep things up and running, and if a business dies, make it easy for someone to open a new one in the vicinity. How could PCNP help me stay operating? Free publicity in Coast to Coast and on website - campaign to central govt for reduction in VAT for accommodation providers, a policy to promote and support community pubs in the park, ref 3.4 guarantee my bed spaces will be full! This building is also our home, and it must sell for enough money to buy a home of an equivalent size, or a smaller home plus a retirement fund! And ref para 3.8 if the community wanted the pub, it would use it enough to keep it in the black - happy to lease to the community and continue to live upstairs! More to say, no space!

**Officer Response**

These comments are valid, but most of them are beyond what can be achieved by the planning system and need to be considered through other means. The policy approach in the Local Development Plan is to protect against unnecessary loss of hotels and guest houses in the National Park and also of community facilities. It is not, however a policy of absolute restraint

and where certain conditions can be met recognises that change is inevitable. No change is recommended.

**788 Mrs Alison Belton, Pembrokeshire Tourism**

Marketed for a period of two years. Do you feel that this period is too long/not long enough?  
Comments

12 months is even too long if your business is down the pan.  
See above - even if it stays open, you cannot force anyone to open doors and run it at a loss - is the PCNP intending to cover my losses whilst this two year period passes? Sometimes I think these bureaucrats need a reality check - if they think that the right marketing plan will sell the place, they should be my agent. I will tell them the asking price (I've had it valued)and they just sell it! Or perhaps they might buy buildings at the asking price and then sell them on as soon as they can!

**Officer Response**

Two years is considered to be a reasonable marketing period which allows for a change of seasons and varied marketing conditions. The Authority is asking for a realistic marketing strategy based on sound advice. A sound marketing strategy will be based on the sale of the business as a going concern and not just on bricks and mortar. A business doing less well will inevitably attract a lower price. No change is recommended.

**788 Mrs Alison Belton, Pembrokeshire Tourism**

2. In reading through the policy, via item 3.1 do you feel that the evaluation of the marketing strategy is a fair way of approaching viability?  
Comments

I feel VERY strongly that EMPLOYMENT AFTER the development work is finished should be considered. In a small community where a Restaurant or Hotel may be one of the very few employers it is vital to the sustainable future of the community. So many villages (even St Davids) have become ghost towns in the winter because there is no focus for activity both leisure and employment.

**Officer Response**

Comments are noted and they support the policy position of the Local Development Plan to protect such services and facilities whenever possible. The comments are not relevant to the supplementary planning guidance however and no change is needed.

**788 Mrs Alison Belton, Pembrokeshire Tourism**

1. Is your business

	Number of Responses	Response Ratio
Accommodation-----	20-----	57.1%
Pub/Restaurant -----	6-----	17.1%
Activity or Attraction-----	5-----	14.2%
Arts/Crafts-----	2-----	7%
Other-----	6-----	17.1%
Total-----	35-----	100%

**Officer Response**

This is a response to a questionnaire survey undertaken by Pembrokeshire Tourism relating to

the draft Supplementary Planning Guidance published for consultation on the Loss of Hotels and Guest Houses in the National Park. No change is needed.

**788 Mrs Alison Belton, Pembrokeshire Tourism**

2. In reading through the policy, via item 3.1 do you feel that the evaluation of the marketing strategy is a fair way of approaching viability?

Yes-----11-----33.3%  
No-----16-----48.4%  
Don't know-----6-----18.1%  
Total-----33

12 comments

**Officer Response**

These survey results are mixed, but no alternatives are suggested here. No change to the document is recommended.

**788 Mrs Alison Belton, Pembrokeshire Tourism**

3. Currently the Supplementary Planning Guidance asks for evidence that the property has been marketed for a period of two years. Do you feel that this period is ...

Too much-----20-----62.5%  
Too little-----14-----43.7%  
Total-----32-----100%

16 Comments

**Officer Response**

Another mixed response. On this basis no change to the document is recommended.

**788 Mrs Alison Belton, Pembrokeshire Tourism**

2. In reading through the policy, via item 3.1 do you feel that the evaluation of the marketing strategy is a fair way of approaching viability?

Comments

Two years is too long, What would happen in the event of a death of a partner within this business? And a prospective buyer wants this as just a home! It is not the parks money involved it is ours. Also what happens if the business is failing and no money available for advertising? Or the business is failing and the mortgage cannot be paid!! Nobody can wait two years.

**Officer Response**

Two years is considered to be a reasonable marketing period which allows for a change of seasons and varied marketing conditions. Land use planning is about the use of land and buildings and whilst individual circumstances can be material considerations when determining a planning application, the authority needs to look at the wider picture and the needs of society as a whole. No change is recommended.

**788 Mrs Alison Belton, Pembrokeshire Tourism**

2. In reading through the policy, via item 3.1 do you feel that the evaluation of the marketing strategy is a fair way of approaching viability?

Comments

"Advertising expensive, small budget you can only do so much. Amazing how many companies want to sell space but can't show you or send you a previous publication first. From our point of view we could make more money by starting up evening meals and afternoon teas and selling food to the camp site next door. But we are older than 15 years ago our customer base has changed don't want set meals and times etc want the freedom to come and go as they want."

**Officer Response**

Comments are noted but are not relevant to the supplementary planning guidance. No change is necessary.

**788 Mrs Alison Belton, Pembrokeshire Tourism**

2. In reading through the policy, via item 3.1 do you feel that the evaluation of the marketing strategy is a fair way of approaching viability?

Comments

The same factors that affect the viability of a business will affect the possibility of its sale as a going concern. These include the quality and nature of the business, its trading history, the health of the local tourism economy and the economy in general. A marketing strategy is not a measure of these factors, whether singly or in combination, and cannot, in itself, be seen as an indicator of viability.

**Officer Response**

Comments are noted. No change is recommended.

**788 Mrs Alison Belton, Pembrokeshire Tourism**

2. In reading through the policy, via item 3.1 do you feel that the evaluation of the marketing strategy is a fair way of approaching viability?

Comments

Providing that the marketing has been determined and genuine.

**Officer Response**

The guidance is intended to ensure that the marketing strategy has been so. No change is needed.

**788 Mrs Alison Belton, Pembrokeshire Tourism**

Marketed for a period of two years. Do you feel that this period is too long/not long enough?

Comments

With the way the market is at the moment no restrictions should be put on a sale. Feel it would be for the purchaser to talk to planning and parks

**Officer Response**

Two years is considered to be a reasonable marketing period which allows for a change of seasons and varied marketing conditions. Purchasers frequently enquire about planning restrictions prior to making a purchase. No change is recommended.

**788 Mrs Alison Belton, Pembrokeshire Tourism**

2. In reading through the policy, via item 3.1 do you feel that the evaluation of the marketing strategy is a fair way of approaching viability?

Comments

We have been up for sale for 4 years, have reduced price and continued to improve the property year on year. My wife and I are well into retirement age and are desperate to retire because of ill health. As our pension is tied up in the business we will have to consider alternative use.

**Officer Response**

Comment noted. No change is needed.

**788 Mrs Alison Belton, Pembrokeshire Tourism**

Marketed for a period of two years. Do you feel that this period is too long/not long enough?

Comments

Two years is a fair length of time to show effects of marketing.

**Officer Response**

Comment is noted. No change is needed.

**788 Mrs Alison Belton, Pembrokeshire Tourism**

2. In reading through the policy, via item 3.1 do you feel that the evaluation of the marketing strategy is a fair way of approaching viability?

Comments

The cost of additional marketing may be a barrier.

**Officer Response**

When selling a business or property there are inevitable costs associated with it. It may be that this respondent is confusing the marketing of the business with publicity of the product. No change is recommended.

**788 Mrs Alison Belton, Pembrokeshire Tourism**

2. In reading through the policy, via item 3.1 do you feel that the evaluation of the marketing strategy is a fair way of approaching viability?

Comments

This refers to Marketing of the property in an attempt to sell it as a business - surely all you need to do is pick a reputable UK-wide agent and have it on view for about six months at whatever price he values it. If he fails, we did our best. Sadly, it could be argued that if you don't sell it, you have priced it too high. So, there is a risk that you fail to sell it you may be required to reduce the value to almost nothing during the two years until you do sell it, and that is a nonsense. Yet another example of gross interference of the authorities in the operation of the property market and the owners right to sell his/her assets as they see fit

**Officer Response**

Two years is considered to be a reasonable marketing period which allows for a change of seasons and varied marketing conditions. The Authority is asking that a genuine market strategy is implemented and the business is marketed at a realistic price. Benchmark definitions and how to go about such a campaign are set out in the Royal Institute of Chartered Surveyors Appraisal and Valuation Manual (Red Book). No change is recommended.

788 Mrs Alison Belton, Pembrokeshire Tourism

2. In reading through the policy, via item 3.1 do you feel that the evaluation of the marketing strategy is a fair way of approaching viability?

Comments

But it seems very prescriptive - especially for the smaller establishments.

**Officer Response**

The size of the establishment is irrelevant - the Authority is asking that it is marketed at a realistic price. No change is recommended.

788 Mrs Alison Belton, Pembrokeshire Tourism

2. In reading through the policy, via item 3.1 do you feel that the evaluation of the marketing strategy is a fair way of approaching viability?

Comments

People need help to know how to market properly. Many of the local estate agents are not proactive enough. Computer literacy would enable people to put properties on the web which is difficult for people who don't know how to use this facility.

**Officer Response**

Comments noted, but these issues are outside planning control. No change is needed.

788 Mrs Alison Belton, Pembrokeshire Tourism

Marketed for a period of two years. Do you feel that this period is too long/not long enough?

Comments

"A Hotel could be sold for a local housing development this is good for the local community, and planning takes long enough anyway.

A Guest House/B&B, the owners might want to retire into it, it is their home after all, do they just leave the notice up and turn everybody away to satisfy the Parks. Also it would make a good size for a large family. Why must they be forced to market this at all or have a valuation, the property market drives this better than the Parks can."

**Officer Response**

It is not clear from this comment if the respondent agrees that 2 years is the correct period of time for marketing a property. The marketing strategy is asked for to ensure that a genuine effort is made to dispose of the business. Should this fail and other elements of the policy can be met then there is scope for a change of use to other uses. No change is recommended.

788 Mrs Alison Belton, Pembrokeshire Tourism

Marketed for a period of two years. Do you feel that this period is too long/not long enough?

Comments

Five years to market a business seems reasonable and would mean that adverse circumstances in one year e.g.. Foot & mouth/ bad weather etc would not distort outcomes.

**Officer Response**

Two years is considered to be a reasonable marketing period which allows for a change of seasons and varied marketing conditions. No change is recommended.

**788 Mrs Alison Belton, Pembrokeshire Tourism**

"Properties running a successful tourist business in the Park should be assisted to expand rather than objected to.

Promotion/permission should be given to small caravan/tent sites rather than allowing existing big ones to get bigger."

**Officer Response**

These comments express the opinions of the respondent but are not relevant to the content of the supplementary planning guidance. No change is needed.

**788 Mrs Alison Belton, Pembrokeshire Tourism**

2. In reading through the policy, via item 3.1 do you feel that the evaluation of the marketing strategy is a fair way of approaching viability?

Comments

"Is there evidence of standards, lack of welcome and under investment, both capital and upkeep may be the cause of failure. Review a full independent business audit. Marketing is not the sole answer.

The passing of planning / licensing and regulatory restrictions, rating hikes as well new competitors on the doorstep, it may be the inability of the business to meet changing customer expectations.

Finally the major cause of failure is under capitalisation and current pressure on borrowing."

**Officer Response**

Whilst these are valid points in relation to the success or otherwise of a hotel business, the marketing campaign referred to in paragraph 3.1 of the supplementary planning guidance relates to the marketing of the business for sale. The comments are not relevant to the supplementary planning guidance and therefore no change is needed.

**788 Mrs Alison Belton, Pembrokeshire Tourism**

THE CONCERNS OF THE PARISH OR COMMUNITY COUNCIL SHOULD BE RESPECTED. THEY OFTEN HAVE A REALLY GOOD INSIGHT TO THE NEEDS OF THE COMMUNITY AND IN MY EXPERIENCE HAVE OFTEN BEEN IGNORED.

**Officer Response**

Community Councils are consulted on all aspects of policy preparation, including the supplementary planning guidance and their comments considered by the Authority as part of the consultation process. No change is needed.

**1307 Mr SA Taylor, Martletwy Community Council**

The Council's observations and comments on the update to the SPG on Loss of Hotels and Guesthouses, it was felt that an opportunity had been missed (in this and the earlier version) to expand its scope to cover public houses - where these are considered to be valuable community facilities - the loss of which would involve not only an economic/employment cost (Policy 36) but also a potentially significant social cost in the local community (Policy 48). The criteria to justify the loss of hotels/guesthouses are broadly similar to those used to justify the loss of community facilities (such as pubs), and the incorporation of the latter within the scope of the SPG would seem logical. It would also make a specific reference to 'pubs' which, although a significant and endangered community resource in some instances, are not explicitly recognised as such in the

body of the text of the Local Development Plan. This may come to represent a weakness in any case the Authority may wish to make to prevent the loss of a pub in appropriate circumstances.

**Officer Response**

The loss of community facilities is of concern to the Authority and Policy 48 of the Local Development Plan seeks to protect against such losses which help to sustain our communities. This is a valid comment, however to incorporate the loss of community facilities within the Hotel and Guest House SPG could make the document complicated and difficult to use. The merits of producing a separate document will need further consideration. No change to the Loss of Hotels and Guesthouses in the Pembrokeshire Coast National Park SPG is recommended.

**2897 Mrs YC Evans, Marloes & St Brides Community Council**

We have noted this document and have no comments to make.

**Officer Response**

Noted. No change needed.

**2899 Mrs Galliford, Milford Haven Town Council**

At the meeting of the Milford Haven Town Council held yesterday evening, Members of the Milford Haven Town Council agreed to accept the above plan, subject to assurances that the area of land identified to be within the boundaries of the Milford Haven Town Council will not be developed.

**Officer Response**

The purpose of the Supplementary Planning Guidance is to provide additional information and advice about Policy 36 of the Local Development Plan. It does not allocate land for development. There are only very small areas of Milford Haven Town Council area within the National Park and their location makes it unlikely that they would be developed for hotel or guest house use. No change can be made to accommodate this comment.

**3950 Mr Darryn Hill, Welsh Assembly Government**

I would advise that the Welsh Assembly Government (Roads and Projects) as Highway Authority for the trunk roads have no objections or comments in respect of this proposal.

**Officer Response**

Noted. No change necessary.

## Planning Obligations

### 1307 Mr SA Taylor, Martletwy Community Council

Martletwy Community Council had no comment to make on this SPG

#### **Officer Response**

Noted. No change needed.

### 2373 Ms Rose Freeman, The Theatres Trust

Our Ref.: RF/3420

#### Planning Obligations

Thank you for your email of 28 January consulting The Theatres Trust on various Supplementary Planning Guidance topics.

The Theatres Trust is The National Advisory Public Body for Theatres. The Theatres Trust Act 1976 states that 'The Theatres Trust exists to promote the better protection of theatres.' It currently delivers statutory planning advice on theatre buildings and theatre use through The Town & Country Planning (General Development Procedure) Order 1995, Article 10, Para (v) that requires the Trust to be consulted on planning applications which include 'development involving any land on which there is a theatre.'

We note the items listed on page 11 and ask whether leisure venues are included within the term 'community facilities' as it is not clear. We are concerned that leisure venues do not benefit appropriately under the terms of S106 and other agreements, and that it will increasingly be necessary to unlock new sources of funding to help pay for significant improvements to them.

We look forward to being consulted on further planning policy documents in due course.

#### **Officer Response**

The current guidance does not set out a contribution for leisure venues beyond open space provision. There are no plans, in the current economic climate, to extend the range of facilities for which contributions are asked for in the guidance. The Plan's Policy on contributions (Policy 48) would not preclude its inclusion at a future date.

### 2897 Mrs YC Evans, Marloes & St Brides Community Council

We have noted this document and have no comments to make.

#### **Officer Response**

Noted. No change needed.

### 2899 Mrs Galliford, Milford Haven Town Council

At the meeting of the Milford Haven Town Council held yesterday evening, Members of the Milford Haven Town Council agreed to accept the above plan, subject to assurances that the area of land identified to be within the boundaries of the Milford Haven Town Council will not be developed.

**Officer Response**

This response does not appear to be relevant to the guidance. No change proposed.

**3950 Mr Darryn Hill, Welsh Assembly Government**

I would advise that the Welsh Assembly Government (Roads and Projects) as Highway Authority for the trunk roads have no objections or comments in respect of this proposal.

**Officer Response**

Noted. No change necessary.

## Landscape Character Assessment

### 1307 Mr SA Taylor, Martletwy Community Council

Martletwy Community Council had no comment to make on this SPG.

#### Officer Response

Noted. No change necessary.

### 2897 Mrs YC Evans, Marloes & St Brides Community Council

LCA9 - Suggest adding the name Talbenny to the map. It is confusing that the sections do not follow normal community boundaries.

Please note that in the last bullet point under the Management Guidance Section that you have used the word 'and' when you mean 'are' in all the LCA sections.

#### Officer Response

The OS base does identify Talbenny on the map, albeit at a small scale. There is no opportunity for the Authority to amend this map. The boundaries for the Landscape Character Areas identify unique landscape areas, they cannot be made to fit community boundaries. The community boundaries do not represent landscape character and would be inappropriate. No change is proposed in response to these comments.

There is a typing error at the last bullet point of the Management Guidance for all LCA areas, and this can be corrected.

### 2899 Mrs Galliford, Milford Haven Town Council

At the meeting of the Milford Haven Town Council held yesterday evening, Members of the Milford Haven Town Council agreed to accept the above plan, subject to assurances that the area of land identified to be within the boundaries of the Milford Haven Town Council will not be developed.

#### Officer Response

This supplementary planning guidance does not allocate land for development. There is a small area of land within the Town Council boundaries of Milford Haven which is within the National Park, and this supplementary planning guidance will help to assess whether any future proposals would affect the special qualities of the National Park for example.

### 3950 Mr Darryn Hill, Welsh Assembly Government

I would advise that the Welsh Assembly Government (Roads and Projects) as Highway Authority for the trunk roads have no objections or comments in respect of this proposal.

#### Officer Response

Noted. No change is necessary.

### 4162 Mr & Mrs David & Christine Young

6.2.5 We feel that enhancing (by lighting) the harbour and town of Tenby revenue would be increased thereby allowing funding for sympathetic development of 'outer parts of the town'.

Tenby – “The Jewel in the Crown”

A project to enhance the unique visual impact of the town on residents and, most important, visitors.

During the daylight hours Tenby has an irresistible attraction, with its quaint cottages, Georgian, Victorian and Edwardian mix of architectural buildings, streets, squares and alleys. All brightly painted and largely enclosed within the mediaeval town walls.

Come dusk and nightfall the town and harbour are lit by orange street lamps: depressing, dull and gloomy. Hardly jewel-like.

This project is to tastefully illuminate the town, its buildings, harbour, mount and waters' edges. To give it the 'magic' it deserves; very much as a past councillor who came up with the idea of residents and businesses painting their properties in an array of Mediterranean colours did.

Visualise what the effect would be in discretely lighting up the town at dusk. This is no Blackpool Illuminations scheme but more akin to the Portmeirion Village as lit at night.

The famous daylight views of Tenby would be added to – encouraging visitors both in and out of season. Tenby could truly become a Town for All Seasons.

We would suggest commissioning architectural lighting specialist companies to put forward proposals and costs. The best scheme to be incorporated into an application to various funding bodies e.g.: Welsh Assembly Government, Welsh Office, Camelot. The application would include an annual running cost projection and a maintenance cost with the selected provider.

The huge savings made by Tenby's Town Clerk by switching to LED lights at Christmas shows how cost-effective lighting can be.

If successful the future for Tenby as a tourist destination would be enhanced and be a success story for the Authority and local business.

#### **Officer Response**

Street lighting falls within the responsibility of Pembrokeshire County Council, and is not a matter that the National Park Authority can control. This representation will be passed to the relevant Department at the County Council with a request to consider its content. No change is proposed in response to this representation.

**4180 Mr Martin Coulson, MOD**

RE: PEMBROKESHIRE COAST NATIONAL PARK AUTHORITY LOCAL DEVELOPMENT PLAN DRAFT SUPPLEMENTARY PLANNING GUIDANCE – LANDSCAPE CHARACTER ASSESSMENT

The Ministry of Defence (MoD) welcomes the opportunity to comment on the above document and supports the publication of a Landscape Character Assessment (LCA) for Pembrokeshire Coast National Park.

However we are disappointed by the tone of the document where it refers to MoD's use and management of Castlemartin Ranges. In particular that there appears to be no acknowledgement of the close working relationships established over many years with Statutory Bodies and Non Governmental Organisations in the active support of National Park statutory

purposes.

The MoD recognises its duty under the Environment Act 1995 to contribute to the purposes of the National Park:

To conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park, and  
To promote opportunities for public enjoyment and understanding of its special qualities.

As well as its duty to foster the economic and social well-being of communities living within the National Park.

The MoD's Integrated Land Management Plan for Defence Training Estate Pembrokeshire reflects this collaborative working. It has provided the basis for a programme of initiatives that have promoted agricultural use that benefits both wildlife and the farming community and increased public access. There has also been substantial enhancement in the natural environment and in the knowledge of the cultural heritage of this area. All this has been achieved whilst the Department has maintained high quality military training as required by the UK government.

We believe the LCA should recognise the importance of Castlemartin Ranges for the public benefit provided by defence use in line with the Circular on the National Parks (12/96) where it is acknowledged that the:

“Defence use of the Parks makes a major contribution to the country's defence capability. It provides essential facilities which could not be readily provided elsewhere. For these reasons, the Parks will continue to be an essential training resource for the foreseeable future.”

We would like to make the case that the long association of this area with military training (since 1938 - a use that pre-dates the National Park designation) has left a legacy of military heritage that itself forms part of the landscape. Cadw recognises that military infrastructure is an integral part of the landscape character. It records the evolution of military training and is worthy of preservation .

Castlemartin Range provides a diverse resource for military training. It is the only place in the UK where tactical armoured vehicle live firing can be undertaken. This is a vital skill necessary to save the lives of Service personnel engaged in difficult and dangerous operations, such as those in Afghanistan.

At Annex A we have made further detailed comments on the LCA for your consideration and some corrections of fact. Further observations you might take into consideration are included at Annex B.

Annex A  
Location, Context and Physical Characteristics

2nd sentence:

DELETE existing text and INSERT “The area is largely occupied by the Ministry of Defence for national defence purposes for both live fire and dry military training.”

## Visual and Sensory Characteristics, Vegetation and Habitat Characteristics and Geological Characteristics

No changes proposed

## Historical and Cultural Characteristics

2nd sentence:

DELETE existing text and INSERT "Castlemartin Range was established in 1938 and is the single largest element in the Defence Training Estate Pembrokeshire. It is used by Regular and Territorial Army, Cadet Forces, other services, some overseas forces, and (uniquely in the UK) by armoured fighting vehicle units for direct-fire live gunnery exercises, with both on-land impact areas and a large offshore safety area."

## Special Qualities (Key Landscape Characteristics)

- This large tract of exposed open coastal grassland landscape has a settled feel with strong coastal character. There are extensive views of the open sea from much of the higher ground and along the coast from the coastal path
- The prominent line of church towers and spires along the ridgeline villages of Warren, St. Twynnell's and St. Petrox are locally distinctive features which still dominate the horizon, in spite of the insensitive siting of military range observation towers at intervals along parts of the same ridge

Comment : The siting of the towers is dictated by their function which links directly to the safe management of the range. Therefore we OBJECT to the inclusion of 'insensitive' in this context.

- The periodic noise of heavy gunfire is discordant and intrusive but when absent, this is a highly exposed, wild and rather tranquil area of the National Park

Comment : Noise is unavoidable when firing is conducted. However, the range is operated within legal parameters.

- There are habitats of international importance here and areas are of outstanding ecological value as a consequence
- Some of the limestone cliff coast has fine examples of rock formations, notably at Elegug Stacks, underlining the outstanding geological landscape value in parts of the Area
- The recorded historical and archaeological features are of national significance, justifying the high value attributed to the historical landscape, of which the churches are the most obvious elements

Comment : Both Warren Church and Flimston Church have been maintained by MOD and the FGA – Federal German Army

- The long-established military training area and ranges co-exist uneasily with the National Park

status, but contribute to wildlife conservation by reducing human disturbance, and public access along the coastal path is permitted when live-firing is not in progress .

Comment : We OBJECT to this negative description, believing it is not borne out by the subsequent comments on MODs effective conservation and management of this area. As mentioned in the body of the letter, it is believed that military training is a public benefit and has been integrated successfully with other land uses, and that the positive outcome should be acknowledged.

INSERT: Firing does not take place at weekends; for two weeks at Easter and two weeks at Christmas, and four weeks during the summer. In addition, in November 2010, the Castlemartin Range Trail was opened. This was a collaborative project to improve access .

Comment : The Range Trail was funded by the Welsh Assembly Government and commended by Jane Davidson, the Environment Minister. MOD also pays 50% of the salary for a National Park Ranger.

#### Discernible Landscape Trends

- The use of parts of the area as military training grounds and live-firing artillery and tank ranges leads to relatively low levels of management in these areas, resulting in a rather neglected appearance. However, the lack of general human disturbance and by dogs will have benefited the wildlife species in the area.

Comment : Amend to read as follows

- The use of parts of the area 'for' military 'dry training (using blank ammunition and pyrotechnics) and armoured fighting vehicle' live-firing leads to relatively low levels of management in these areas, resulting in a rather neglected appearance. However, the lack of general human disturbance and by dogs 'will have' benefited the' wildlife species in the area .

Comment : The area is grazed by cattle and sheep and has recently been designated as a Site of Special Scientific Interest for its habitat qualities.

- The exclusive effects of military use have prevented damage to many archaeological sites except at a very localised level, since there has been no deep ploughing, sub-soiling or land drainage work. Active consolidation or management means that many features are improving.

Comment : amend to read as follows

- The exclusive effects of military use have prevented damage to many archaeological sites except at a very localised level, since there has been no deep ploughing, sub-soiling or land drainage work. Active consolidation 'and' management 'by the MOD' means that many features are improving.

#### Management Guidance

- Retain coastal character with low levels of built development and maintenance of traditional field boundaries. Ensure that any new agricultural buildings respect the historical and cultural significance of the landscape in terms of their siting, layout, form and construction materials
- Walls and hedges that have suffered neglect should be restored with appropriate management

including regular cutting hedges

- Encourage landowners to participate in agri-environmental schemes, with particular emphasis on promotion of the restoration or rehabilitation of traditional field boundary hedge banks and stone walls at key visual locations
- Monitor the spread of bracken to prevent extending into heath land areas. Do not allow agriculturally improved land to extend into heath land areas, sea cliff grassland or neutral grassland.
- Ensure that as far as possible ancient monuments and remains are not lost or damaged.

Comment : INSERT

- Support the continued management of the Castlemartin Ranges, recognising that development approval may be required to support defence operational requirements, and encourage the removal of any assets once they are declared redundant

### **Officer Response**

It is acknowledged that Castlemartin is managed with conservation as a priority and has historically been protected from intensive farming practices. The MoD is regarded as working well with other bodies including the national park to promote conservation interests. Whilst the landscape character assessment comments on the activities of the MoD in relation to impact on the landscape, it does not comment on the wider public benefit of these activities. This is considered to be the right approach for a landscape document. In addition, the document is intended to provide easily accessible information in a format which is useful to the public. Excessive detail has been avoided wherever possible.

The specific comments and amendments suggested by the MoD are responded to below.

- 'Location, Context and Physical Characteristics' (page 24) can be amended to read "the area is largely occupied by the MoD for national defence purposes for both live fire and dry military training". This change highlights the role of the MoD here.
- 'Historic and Cultural Characteristics' (page 24). The proposed change to the existing text introduces the date the Castlemartin Range was established, and amends armoured units to 'armoured fighting vehicle unit'. These changes re-enforce the historic and cultural identity of the LCA and is appropriate to include.
- 'Special Qualities' 2nd bullet point' (page 25 'Insensitive' in this context relates to the landscape impact only. Removal of the word insensitive does not affect the overall meaning of the sentence and it can be deleted.
- 'Special Qualities' 3rd bullet point' (page 25). It is noted that noise is unavoidable and within legal parameters, however the special quality considers the impact of the noise and this is considered to be the right approach. No change is proposed.
- 'Special Qualities' 6th bullet point (page 25). Whilst the maintenance of the churches is commendable, it is not part of the special quality itself and no amendment is supported to include this.
- 'Special Qualities' 7th bullet point (page 25). The proposed description of the firing times is overly detailed and should not be included here. Changes can be made to the text however to remove 'uneasily' and to introduce reference to the range trail to include 'an alternative route is also available via the Range trail which provides uninterrupted access along the inland perimeter of the Castlemartin Range'.
- 'Discernable landscape trends' 1st bullet point (page 25) The amendments regarding dry training and typographical errors can be included. They clarify the bullet point. The Authority has recently been notified of the Castlemartin Cliffs and Dunes SSSI enlargement which is called the

Castlemartin Range SSSI. Objections to the extended SSSI must be received by CCW by the 2nd July 2011. Additional text is proposed to read 'CCW has recently notified the Castlemartin Range SSSI'

- 'Discernable landscape trends' 2nd bullet point (page 25). The amendment to reflect management by the MoD can be included.
- Management Guidance (additional bullet point). The additional wording proposed can be accommodated and provides clarity about this situation.

## Sustainable Design

### 1307 Mr SA Taylor, Martletwy Community Council

Martletwy Community Council had no comment to make on this SPG.

#### **Officer Response**

Noted. No change needed.

### 2897 Mrs YC Evans, Marloes & St Brides Community Council

We have noted this document and have no comments to make.

#### **Officer Response**

Noted. No change needed.

### 2899 Mrs Galliford, Milford Haven Town Council

At the meeting of the Milford Haven Town Council held yesterday evening, Members of the Milford Haven Town Council agreed to accept the above plan, subject to assurances that the area of land identified to be within the boundaries of the Milford Haven Town Council will not be developed.

#### **Officer Response**

This response does not appear to be relevant to the guidance. No change proposed.

### 3778 Mrs Sandra Bayes, Newport Area Environment Group

NAEG is interested particularly in SPG Sustainable Design which you indicate is due for "technical update" in relation to National Planning Policy and Local Development Plan Policy. Further, the PCNPA website tells us that the PCNPA considers that this document "remains relevant" and "up-to-date" but requires some amendment in relation to LDP policy 29 and national policy and an "addendum" is the most appropriate way forward.

With respect, NAEG does not agree with you. We consider this potentially to be very important guidance but it must be vastly improved to make it more fit for purpose, informative and user friendly.

We advocate instead instigation of a meaningful consultation involving the many highly informed stakeholders in this area and full replacement of the existing document

Whilst writing, I wish to also register our interest in the SPG Newport and Newport Parrog Conservation Area Statement and Proposals documents which again we consider require a major rewriting to turn them into anything like useful guidance.

#### **Officer Response**

This guidance as previously adopted by the Authority was reviewed prior to consultation to see if it was still fit for purpose. Given the leading role that Welsh Government planning policy now takes on sustainable design it was debatable as to whether the guidance needed to carry on. It was considered however, that it still provided a useful aid to applicants and was retained.

### 3950 Mr Darryn Hill, Welsh Assembly Government

I would advise that the Welsh Assembly Government (Roads and Projects) as Highway Authority for the trunk roads have no objections or comments in respect of this proposal.

**Officer Response**

Noted. No change necessary.

**4125 Ms Vicky Moller, Cilgwyn Community Group**

The SPG misses an opportunity to make explicit the connection between sustainable design and design that fits with national park purposes.

It does not clarify how beauty in the built environment is a product of a close relationship between people and nature. That buildings that are a result of the terrain, climate, resources and materials, opportunities and challenges of their landscape and the local skills and styles and socio economic patterns surrounding them, look perfect in their setting, they belong.

The booklet could help people to understand that the formative forces that make buildings belong in their environment create both functional beauty and a sustainable future.

The booklet's over-arching statements at the beginning point in a different direction, one that suggests the old values of keeping things looking the same is paramount, but sustainability considerations need to be slotted in.

“In essence, sustainable design equates to nothing more than applied common sense and respect for the traditional principles of good design.”

“Conservation of each National Park’s special qualities and local distinctiveness is paramount. Place making is about ensuring that an area retains its unique character. However, this principle is not contrary to good, contemporary design. The guidance encourages the use of appropriate aspects of local design traditions to produce contemporary buildings. In the preparation of this guidance the aim has therefore been to dovetail these critical issues of sustainability and place-making within the particular context of development in the National Parks.

Further on in the booklet there is useful detailed technical information on energy and homes.

I fear there is a high risk that the extra demands on applicants to make detailed statements on diverse aspects of their buildings may make it impossible for ordinary mortals to apply, and leave development to developers and planning consultants. It does not mean that building will be better, just more expensive due to these requirements for formal statements.

There are some expensive endemic problems with the planning process which could be reduced by a collaborative approach rather than a 'permit - refuse' paradigm. I understand that other regulatory agencies are adopting this sort of approach, working with applicants to meet their needs while meeting the requirements and aspirations they are employed to implement. The Environment Agency and Pembrokeshire's listed buildings officer adopt this collaborative approach I have found.

Perhaps a consultation on the planning process would turn up some useful suggestions, or has there already been one in recent years?

**Officer Response**

Chapter 4, paragraph 4.2 encapsulates the approach and emphasis taken in the supplementary planning guidance which is one gleaned in part from the workshops undertaken with key stakeholders in its original drafting. The guidance at paragraph 5.2 refers to guarding against slavishly following traditional approaches and proposes a possible model at 5.3 the detail of which follows. A review of the planning process is beyond this guidance. The requirements for design and access statements are national requirements.

## Building Extensions

### 1307 Mr SA Taylor, Martletwy Community Council

Martletwy Community Council had no comment to make on this SPG.

#### Officer Response

Noted. No change needed.

### 2897 Mrs YC Evans, Marloes & St Brides Community Council

- The Council would suggest that this is only required after planning consent is granted. Perhaps this function could be delegated to the County Council Building Control Department to secure the improvements on the original building. This would save the applicant expending more money than necessary at the planning stage. This is particularly important when the applicant may be trying to undertake the planning process him/herself, rather than use professionals.
- Please note there is no gas in much of the rural areas of Pembrokeshire.
- Enforcement of these additional planning conditions would appear to be a problem, as the National Park does seem overstretched now.

#### Officer Response

This is not a requirement of building regulation but a requirement of Plan policy and therefore it cannot be left to building regulation. The guidance has been drafted so that improvements required will prove cost effective (see – see annual savings estimated in Appendix 2) and are proportional (see Section 8 – the total costs of improvement will be no more than 10%). The Questionnaire required for completion is straightforward and in a pilot scheme the Authority has been operating more recently we are looking at ways to simplify further- See Appendix A. The pilot scheme is also raising questions about monitoring implementation of this proposal but these can only be addressed once proposals begin to be implemented. Once implemented changes can be made as necessary.

### 2899 Mrs Galliford, Milford Haven Town Council

At the meeting of the Milford Haven Town Council held yesterday evening, Members of the Milford Haven Town Council agreed to accept the above plan, subject to assurances that the area of land identified to be within the boundaries of the Milford Haven Town Council will not be developed.

#### Officer Response

This response does not appear to be relevant to the guidance. No change proposed.

### 3950 Mr Darryn Hill, Welsh Assembly Government

I would advise that the Welsh Assembly Government (Roads and Projects) as Highway Authority for the trunk roads have no objections or comments in respect of this proposal.

#### Officer Response

Noted. No change necessary.

## Safeguarding Mineral Zones

### 1307 Mr SA Taylor, Martletwy Community Council

Martletwy Community Council had no comment to make on this SPG.

#### **Officer Response**

Noted. No change necessary.

### 2897 Mrs YC Evans, Marloes & St Brides Community Council

We have noted this document and have no comments to make.

#### **Officer Response**

Noted. No change necessary.

### 2899 Mrs Galliford, Milford Haven Town Council

At the meeting of the Milford Haven Town Council held yesterday evening, Members of the Milford Haven Town Council agreed to accept the above plan, subject to assurances that the area of land identified to be within the boundaries of the Milford Haven Town Council will not be developed.

#### **Officer Response**

Safeguarding mineral zones sets out a process to make sure that safeguarded minerals are taken into account prior to development taking place. It does not allocate land for development and it is not possible to provide a re-assurance that land will not be developed within the Town Council boundaries of Milford Haven, the large majority of which is outside of the National Park. No change is proposed.

### 3950 Mr Darryn Hill, Welsh Assembly Government

I would advise that the Welsh Assembly Government (Roads and Projects) as Highway Authority for the trunk roads have no objections or comments in respect of this proposal.

#### **Officer Response**

Noted. No change is necessary.

## Land Instability resulting from Former Coal Workings

### 1307 Mr SA Taylor, Martletwy Community Council

Martletwy Community Council had no comment to make on this SPG.

#### **Officer Response**

Noted. No change necessary.

### 2897 Mrs YC Evans, Marloes & St Brides Community Council

We have noted this document and have no comments to make.

#### **Officer Response**

Noted. No change necessary.

### 2899 Mrs Galliford, Milford Haven Town Council

At the meeting of the Milford Haven Town Council held yesterday evening, Members of the Milford Haven Town Council agreed to accept the above plan, subject to assurances that the area of land identified to be within the boundaries of the Milford Haven Town Council will not be developed.

#### **Officer Response**

This supplementary planning guidance shows area of land instability resulting from former coal workings which should be taken into account if development is proposed. It is not possible to provide a re-assurance that land will not be developed within the Town Council boundaries of Milford Haven, the large majority of which is outside of the National Park. No change is recommended.

### 3617 Miss Rachael A Bust, The Coal Authority

Having previously had the ability to comment informally upon this SPG during its production stages The Coal Authority has no further comments to make at this stage.

The Coal Authority obviously welcomes and supports the SPG which will ensure that a suitable local policy context exists for this locally distinctive planning issue. The SPG conforms to the parent Local Development Plan and to national planning policy in Planning Policy Wales (Edition 3) and MTAN 2 on Coal.

#### **Officer Response**

Support noted. No change required

### 3950 Mr Darryn Hill, Welsh Assembly Government

I would advise that the Welsh Assembly Government (Roads and Projects) as Highway Authority for the trunk roads have no objections or comments in respect of this proposal.

#### **Officer Response**

Noted. No change is necessary.

## Parking

### 1307 Mr SA Taylor, Martletwy Community Council

Martletwy Community Council had no comment to make on this SPG.

#### **Officer Response**

Noted. No change is necessary.

### 2897 Mrs YC Evans, Marloes & St Brides Community Council

We would suggest a further category to cover the use of dwellings as holiday homes/ lets as these from our experience generate more vehicular use than a normal household. This is particularly important when whole estates are used for such purposes, e.g. Green Meadow Close, Marloes. The overspill from this estate are parking elsewhere in the village at peak holiday periods. There may be a need to include a general parking provision on such estates.

#### **Officer Response**

Houses used as holiday lets or holiday homes are not distinguished in land use planning terms from those permanently occupied. Planning permission is not required to use a house as a holiday home and so the parking standards would be those required for a normal residence. In instances where proposals relate to purpose-built self-catering accommodation the standards for particular property types would be applied, e.g.. Houses or apartments etc. No change to the document is recommended.

### 2899 Mrs Galliford, Milford Haven Town Council

At the meeting of the Milford Haven Town Council held yesterday evening, Members of the Milford Haven Town Council agreed to accept the above plan, subject to assurances that the area of land identified to be within the boundaries of the Milford Haven Town Council will not be developed.

#### **Officer Response**

The purpose of the Supplementary Planning Guidance is to provide additional information and advice about planning requirements in relation to parking. It does not allocate land for development. There are only very small areas of Milford Haven Town Council area within the National Park and their location makes it unlikely that they would be developed for hotel or guest house use. No change can be made to accommodate this comment.

### 3950 Mr Darryn Hill, Welsh Assembly Government

I would advise that the Welsh Assembly Government (Roads and Projects) as Highway Authority for the trunk roads have no objections or comments in respect of this proposal.

#### **Officer Response**

Noted. No change necessary.

## Historic Environment (Archaeology)

### 1307 Mr SA Taylor, Martletwy Community Council

Martletwy Community Council had no comment to make on this SPG

#### **Officer Response**

Noted. No change is necessary.

### 2897 Mrs YC Evans, Marloes & St Brides Community Council

Is this information readily available and apparent to a new owner and/or developer, particularly at the pre-planning stage? This is particularly important when you may have to consider less obvious elements like military history.

#### **Officer Response**

The supplementary planning guidance is intended to inform developers and landowners prior to a planning application being submitted. It will be made available via our web site, at libraries and on request.

### 2899 Mrs Galliford, Milford Haven Town Council

At the meeting of the Milford Haven Town Council held yesterday evening, Members of the Milford Haven Town Council agreed to accept the above plan, subject to assurances that the area of land identified to be within the boundaries of the Milford Haven Town Council will not be developed.

#### **Officer Response**

This supplementary planning guidance provides information to developers and landowners about taking into account archaeology prior to development. It does not allocate land for development. It is not possible to provide a re-assurance that land will not be developed within the Town Council boundaries of Milford Haven, the large majority of which is outside of the National Park. No change is recommended.

### 3950 Mr Darryn Hill, Welsh Assembly Government

I would advise that the Welsh Assembly Government (Roads and Projects) as Highway Authority for the trunk roads have no objections or comments in respect of this proposal.

#### **Officer Response**

Noted. No change necessary.

**Appendix C to the Supplementary Planning Guidance Report**

Reference	Change Proposed
<p>Landscape Character Assessment (LCA) - Visual and Sensory aspect area classifications.</p> <p>LCA Evaluation and Recommendations</p>	<p>The Countryside Council for Wales (CCW) has undertaken an all Wales consistency exercise in relation to the visual and sensory layer for LANDMAP. Amendments have been made to the classification of several visual and sensory aspect areas within the National Park to change the classification (mostly to raise the classification) and/or to amend boundaries. These will be published by CCW shortly.</p> <p>The classification and boundaries of the aspect areas do not affect the LCA specifically which draws on the classifications in general terms only.</p> <p>Change: Update the evaluation for relevant LCA visual and sensory aspect areas. The amendments have been published in draft only at present and are therefore not included in Appendix D. Delegated powers are requested to amend the guidance when the final proposed changes are available.</p>
<p>Loss of Hotels and Guest Houses in the Pembrokeshire Coast National Park</p> <p>Paragraph 3.4, bullet 3</p>	<p>Change: Replace reference to Wales Tourist Board with Visit Wales.</p>

**Extract from  
Draft Supplementary Planning Guidance**

**Loss of Hotels and Guest Houses in the Pembrokeshire  
Coast National Park  
December 2010**

3.2 Planning applicants will need to provide the following information when making an application:

- a) Applicants shall submit an initial valuation of the business and premises, accompanied by a marketing strategy to sell the business as a going concern. The valuation should be based on the present use of the premises, and should not take into account any potential additional value that might be gained by converting the premises to an alternative use. The valuation would be prepared by a suitably qualified Chartered Surveyor prior to implementation of the marketing plan.
- b) A written report prepared by the marketing agent, who must be a Chartered Surveyor, will need to be submitted with the planning application. The report will need to include:
  - the actions taken during the marketing period;
  - the level of any interest and or offers generated; and
  - confirmation that any changes in the property's market value during the marketing period were reflected by corresponding changes to the asking price in order to ensure that it remained realistically priced throughout.
- c) Sound advertisement of the premises for customers is also important in today's competitive trading environment, and the Authority will need to see evidence that the applicant has taken positive and appropriate action to promote all aspects of the business over the last three years.

3.3 As a safeguard, we may commission an independent valuation and marketing report at our own cost to affirm that the property has been marketed on realistic terms.

3.4 The second criterion of the policy requires, that the overall demand for this type of accommodation during peak periods will continue to be met within the town/village/area. This will be done as follows:

- Establishments of the same grading (or no grading, if applicable) within a given area will be identified;
- The number of bedspaces provided by the application establishment will be calculated as a percentage of the total of those identified above;
- ~~Wales Tourist Board~~ [Visit Wales](#) statistics will be used to establish an average peak occupancy rate for that particular type of establishment;
- The percentage of bed spaces in the application premises will be compared with the occupancy rate to establish if need can continue to be met by the remaining providers.

3.5 The NPA will consider any additional sound evidence provided by the applicant to meet this requirement.