

REPORT OF THE HEAD OF PARK DIRECTION

SUBJECT: THE PREFERRED STRATEGY (PRE-DEPOSIT LOCAL DEVELOPMENT PLAN REPLACEMENT), DRAFT SUSTAINABILITY APPRAISAL, DRAFT EQUALITIES IMPACT ASSESSMENT, CANDIDATE SITES REGISTER

Purpose of the Report

1. This item asks Members to approve the attached draft preferred strategy for the Pre-Deposit Local Development Plan (replacement) for consultation (Appendix 1).
2. Also requested for approval for consultation are:
 - the Sustainability Appraisal link provided on the Committee Papers website and in the footnote below¹. A non-technical summary is attached as Appendix 2.
 - and the Equalities Impact Assessment link provided on the Committee Papers website and in the footnote below. A summary is attached as Appendix 3.
 - the Candidate Site Register link provided on the Committee Papers website and in the footnote below. A summary sheet is provided as Appendix 4.
3. A Report of Consultations to date can be viewed – link provided on the Committee Papers website.
4. It is anticipated that the consultation will be during June and July 2017. Town & Community Councils have been notified that these papers are available to view on our website.
5. The **Preferred Strategy** sets out:
 - **Where we are now:** What key issues need to be addressed?
 - **Where we want to be:** An overall vision for the future
 - **How we get there:** A land use strategy for the Park identifying the scale of overall development proposed, where it will be located and what other strategic policies are needed to help implement the strategy.
 - **A Key Diagram:** showing the areas of the Park affected by the proposed strategy. Please see Appendix 1.
6. The **Sustainability Appraisal** sets out:

¹ Preferred Strategy Webpage
<http://www.pembrokeshirecoast.org.uk/default.asp?PID=795>

- how the appraisal was carried out;
- any difficulties encountered in undertaking the appraisal;
- the rationale for the options considered and the reasons for selection of the preferred option and for the rejection of alternatives (noting that this will include wider, non SA considerations);
- the story behind the plan's preparation, including the role of the SA in developing, refining and choosing between options;
- the anticipated effects of the plan;
- any proposed mitigation or enhancement measures (and information as to how these have been reflected in the plan); and
- proposals for monitoring (i.e. potential indicators for monitoring the significant effects identified through the SA).

7. Appendix 2 provides a non-technical summary.

Equalities Impact Assessment

8. The Public Equality Duty requires the Authority to have due regard to the need to eliminate discrimination, promote equality of opportunity and foster good relations between different communities. This means that, in the formative stages of our policies, procedure, practice or guidelines, the Authority needs to take into account what impact its decisions will have on people who are protected under the Equality Act 2010 (people who share a protected characteristic of age, sex, race, disability, sexual orientation, gender reassignment, pregnancy and maternity, and religion or belief).
9. The Replacement Local Development Plan Preferred Strategy has been subject to an Equality Impact Assessment in line with the Equality Act 2010. Appendix 3 provides a summary.

Candidate Sites Register

1. In anticipation of preparing the Plan the Authority has invited anyone with an interest in land to submit sites for consideration for inclusion in the local development plan. In addition the Authority has considered if there are any other sites which may be suitable for development.
2. A provisional view on what sites are considered to be in accordance with the Preferred Strategy is set out in Appendix 4. The full Candidate Site Register can be found using links on the Committee Papers website.
3. Land allocations are not set out in the Preferred Strategy but will be set out in a future 'Deposit Plan.'
4. Sites not proposed at this stage by the local planning authority could be introduced later in the plan making or examination processes if the need arises.

Evidence Base

5. Background Papers are included on the Authority's website. This is to ensure that the development plan is based on real evidence so that the plan will be deemed to be 'sound'.
6. They include plans and proposals by other organisations.
7. These Background Papers will be updated and added to throughout the preparation of the Plan. Officers are continuing to update in advance of the Preferred Strategy consultation.

Risk considerations

8. Revising the Plan is a statutory requirement. The risks associated with preparing this Local Development Plan are set out in the Authority's Delivery Agreement.

Financial considerations

9. Local Development Plan revision is budgeted for by the Authority.

Welsh Language considerations

10. The publication and consultation exercises are carried out in accordance with the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards Regulations (No.1) 2015. The impacts on the Welsh language also forms part of the appraisal process.

Human Rights considerations

11. The planning system seeks to progress legitimate aims by managing the development and use of land in the public interest to contribute to achieving sustainable development. It reconciles the needs of development and conservation, securing economy, efficiency and amenity in the use of land, and protecting natural resources and the historic environment. Human rights under Articles 1 (right to peaceful enjoyment to property), 8 (right to respect for the home, private and family life) and 14 (right to equality), are the most relevant ones. Proportionality means that the measure which interferes with the right must strike a fair balance between the aim and the right which it interferes with.
12. The process for Local Development Plan preparation and its rigorous assessment procedures will support this approach.

Next Steps

13. Subject to Member approval the formal Preferred Strategy consultation will be undertaken the results of which will be first discussed through the Local Development Plan Member workshops.
14. Responses received will be considered by the Authority in due course and a general description of how these comments have affected the policies and proposals of the Local Development Plan will be fed back to respondents as soon as reasonably practicable. A schedule of individual site related comments or suggestions for new site allocations will also be published.

Recommendations:

- (a) Approve the draft Preferred Strategy and Key Diagram for the Pembrokeshire Coast National Park for consultation.**
- (b) Approve the draft Sustainability Appraisal for the draft Preferred Strategy for consultation.**
- (c) Approve the draft Equalities Impact Assessment for the draft Preferred strategy for consultation.**
- (d) Approve the Candidate Site Register for consultation.**

Background documents

[Pembrokeshire Coast National Park Local Development Plan Adopted September 2010](#)

[Welsh Government Local Development Manual August 2015](#)

[Planning Policy Wales Edition 9 November 2016](#)

[Welsh Statutory Instrument 2005 No. 2839 The Town & Country Planning \(Local Development Plan\) \(Wales\) Regulations 2005](#)

[Welsh Statutory Instrument 2015 No.1598 The Town & Country Planning \(Local Development Plan\) \(Wales\) \(Amendment\) Regulations 2015](#)

[Local Development Plan Review Report](#)

[Local Development Plan Monitoring Reports 2011, 2012, 2013, 2014, 2015, 2016](#)

[Local Development Plan Delivery Agreement](#)

[Community & Town Council Workshops](#)

[Background Papers](#)

(For further information please contact Martina Dunne, Head of Park Direction extension 4820).

Pembrokeshire Coast National Park

Local Development Plan (Replacement) - end date 2031

Preferred Strategy
(Pre-Deposit Local Development Plan
documents)

PEMBROKESHIRE COAST NATIONAL PARK
AUTHORITY

National Park Authority Meeting 17 May 2017
Draft for Approval

Contents Page

LIST OF POLICIES	5
1. INTRODUCTION	7
What is a Preferred Strategy?	7
National Planning Policy	7
The Pembrokeshire Coast National Park Management Plan	8
Evidence Gathering	8
Well-being of Future Generations Act 2015	8
Engagement	9
Sustainability Appraisal and Habitats Regulations Assessment	9
Equalities Impact Assessment	10
Tests of Soundness	10
Candidate Sites	10
Key Diagram, Proposals Map & Constraints Map	10
2. WHERE WE ARE NOW - NATIONAL PARK PORTRAIT	12
Key issues to address	13
National Park Purposes	13
A. Special qualities	13
B. Major development, the potential for growth	13
C. Climate change, sustainable design, renewable energy, flooding	13
D. Visitor economy, employment and rural diversification	13
E. Affordable housing and housing growth	13
F. Community facilities	14
3. WHERE WE WANT TO BE – VISION AND OBJECTIVES	15
Vision	15
Local Development Plan Vision for the Pembrokeshire Coast National Park 2031	15
Objectives	16
A. Special Qualities	16
B. Major development, the potential for growth	17
C. Climate change, sustainable design, renewable energy, flooding	18
D. Visitor economy, employment and rural diversification	19
E. Affordable housing and housing growth	20
F. Community facilities	20
4. HOW WE GET THERE – LOCAL DEVELOPMENT PLAN STRATEGY AND POLICIES	21
Translating the vision and objectives into a Local Development Plan strategy and policies	21
National Park Purposes and Duty	25
Spatial Strategy	25
Tenby – Local Service and Tourism Centre	27
Newport – Local Centre	29
Saundersfoot – Local Centre	31
St Davids – Local Centre	32
Crymych – Local Centre	34
Rural Centres	34
Countryside	36

A. Special Qualities of the National Park	43	
Light Pollution		46
Biodiversity		46
Welsh Language		48
Historic Environment		50
Landscape		52
Open Space & Green Wedges		55
Coast		56
B. Major Development, the Potential for Growth	60	
Major Development		60
Nationally Significant Infrastructure Projects		60
Developments of National Significance in Wales		60
Ministry of Defence		61
Hazardous Installations		61
Scale of Growth		62
Minerals		64
Waste		71
C. Climate Change, Sustainable Design, Renewable Energy, Flooding	76	
Sustainable Design		77
Renewable Energy		82
Flooding and Coastal Inundation		84
D. Visitor Economy, Employment	91	
Visitor Accommodation, Attractions, Leisure Activities and Recreation		91
Employment		101
Farm Diversification		106
E. Affordable Housing and Housing Provision	109	
Demographic Analysis		109
Local Housing Market Assessment		111
Gypsy and Traveller Sites		126
One Planet Development		128
F. Community Facilities, Retailing, Transport	131	
Community Facilities & Infrastructure		131
Retail		134
Sustainable Transport		138
Utility Services		141
5. MONITORING	144	
National Park Purposes and Duty and the Spatial Strategy		146
2A Special Qualities		148
2B Major development, the potential for growth		149
2C Climate change, sustainable design, renewable energy, flooding		149
2D Visitor economy, employment and rural diversification		151
2E Affordable housing and housing growth		152
2F Community Facilities, Retailing and Transport		155
6. GLOSSARY OF TERMS	158	
APPENDIX 1 ALLOCATIONS – TO BE INSERTED AT DEPOSIT STAGE	165	

Key Diagram – see separate document

Proposals Map – see separate document (to be prepared for the Deposit Plan)

List of Policies

Policy Number	Policy Title
National Park Purposes and Duty	
Policy 1	National Park Purposes and Duty (Strategy Policy - overarching)
Spatial Strategy	
Policy 2	Tenby Local Service and Tourism Centre (Tier 2) (Strategy Policy)
Policy 3	Newport Local Centre (Tier 3) (Strategy Policy)
Policy 4	Saundersfoot Local Centre (Tier 3) (Strategy Policy)
Policy 5	St Davids Local Centre (Tier 3) (Strategy Policy)
Policy 6	Rural Centres (Tier 4) (Strategy Policy)
Policy 7	Countryside (Tier 5) (Strategy Policy)
A. Special Qualities	
Policy 8	Special Qualities (Strategy Policy)
Policy 9	Light Pollution
Policy 10	Local Sites of Nature Conservation or Geological Interest
Policy 11	Protection of Biodiversity
Policy 12	Welsh Language
Policy 13	Historic Landscapes Parks and Gardens Deleted
Policy 14	Protection of Buildings of Local Importance
Policy 15	Conservation of the Pembrokeshire Coast National Park
Policy 16	Open Space and Green Wedges
Policy 17	Shore Based Facilities
Policy 18	Porthgain, Saundersfoot, Solva and Tenby Harbours
B. Major Development, the Potential for Growth	
Policy 19	Hazardous Installations
Policy 20	Scale of Growth (Strategy Policy)
Policy 21	Minerals Safeguarding
Policy 22	Buffer Zones
Policy 23	Borrow Pits
Policy 24	Local Building Stone
Policy 25	Recycled, Secondary and Waste Materials
Policy 26	Inactive Mineral Sites
Policy 27	Local Waste Management Facilities
Policy 28	Composting
C. Climate Change, Sustainable Design, Flooding, Sustainable Energy	
Policy 29	Sustainable Design (Strategy Policy)
Policy 30	Amenity
Policy 31	Minimising Waste
Policy 32	Surface Water Drainage
Policy 33	Renewable Energy (Strategy Policy)
Policy 34	Flooding and Coastal Inundation (Strategy Policy)
Policy 34A	Development in the Coastal Change Management Area
Policy 34B	Relocation of existing permanent dwellings affected by coastal change
Policy 34C	Relocation and replacement of development (other than

Policy Number	Policy Title
	residential) affected by coastal change
D. Visitor Economy, Employment	
Policy 35	Visitor Economy (Strategy Policy)
Policy 36	Loss of Hotels and Guest Houses
Policy 37	Self-Catering Development
Policy 38	Camping, Touring Caravans, Statics and Chalet Sites Deleted
Policy 38A	Caravan, Camping and Chalet Development
Policy 39	Upgrading Statics, Touring Sites and Tent Pitches Deleted
Policy 40	Site Facilities on Tent, Chalet and Caravan Sites
Policy 41	Change of Use from Tent Pitches to Touring Caravan Pitches Deleted
Policy 42	Employment Sites and Live/Work Units (Strategy Policy)
Policy 43	Protection of Employment Sites and Buildings
Policy 43 A	Agricultural Diversification
E. Affordable Housing and Housing	
Policy 44	Housing (Strategy Policy)
Policy 44A	Housing Allocations
Policy 45	Affordable Housing (Strategy Policy)
Policy 46	Gypsy Sites
Policy 47	One Planet Development
F, Community Facilities, Retailing, Transport	
Policy 48	Community Facilities and Infrastructure Requirements (Strategy Policy)
Policy 49	Retail in the National Park (Strategy Policy)
Policy 50	Town and District Shopping Centres
Policy 51	Garden Centres
Policy 52	Sustainable Transport (Strategy Policy)
Policy 53	Impacts of Traffic
Policy 54	Cycleways
Policy 55	Powerlines and Pipelines
Policy 56	Telecommunications

1. Introduction

What is a Preferred Strategy?

- 1.1 The purpose of this Preferred Strategy is to set out the long term vision for the Pembrokeshire Coast National Park and the objectives and land use policies needed to deliver that vision.
- 1.2 This document outlines:
 - a) Where we are now
 - b) Where we want to be by 2031
 - c) How we can get there
- 1.3 This is not a full draft of the replacement Local Development Plan. These will be called the Deposit Local Development Plan and will form the second formal consultation on replacement Local Development Plan preparation.
- 1.4 The Preferred Strategy does not include site-specific allocations for example housing. This will be included in the Deposit Local Development Plan.
- 1.5 Details of all stages of Local Development Plan preparation can be found in the Authority's Delivery Agreement.¹
- 1.6 The Planning and Compulsory Purchase Act 2004 provides the framework for Local Development Plans in Wales.
- 1.7 The Plan should be seen and read as a whole. Often there will be more than one policy relevant to a proposed development, and all policies will be taken into consideration. In order to make the Plan simple to follow and easily understood policies have been expressed as directly as possible. Issues such as landscape, amenity, access, and design will arise with practically all applications for development and separate policies are included on each of these aspects.

National Planning Policy

- 1.8 In producing the replacement Local Development Plan Preferred Strategy the National Park Authority has had regard to national planning policies.² In accordance with guidance contained in national planning policy Local Development Plans should have regard to national planning policies but not repeat them. The Local Development Plan should therefore be considered in conjunction with the Planning Policy Wales, Edition 9, November 2016 which identifies those areas where clear statements of national development control policy should not need to be repeated in Local Development Plans. It should be noted therefore that the Local Development Plan only provides the policy

¹ Pembrokeshire Coast National Park - Delivery Agreement

² Includes Planning Policy Wales, Circulars and Technical Advice Notes.

framework for issues of a locally distinct nature. Development proposals that do not present specific locally distinct issues will be assessed in accordance with the requirements of national planning policy.

The Pembrokeshire Coast National Park Management Plan³

- 1.9 The land use planning dimension of the National Park Management Plan is put into effect through the statutory Local Development Plan for each National Park. The National Park Management Plan is of national importance. National Park Management Plan objectives and policies therefore prevail over regional and local policy as it is delivered in the National Parks. The Guidance adds: “Indeed the imperatives of the National Park purposes should be reflected in these other Plans, including the Local Development Plan”.⁴

Evidence⁵ Gathering

- 1.10 The wider policy context has been reviewed, for example national policy. Regional work as far as it has been developed was also considered. Primary research has also been reviewed and updated, for example, affordable housing viability, the original retail study and the original survey of towns and villages for facilities available. The Sustainability Appraisal has also been a significant contributor to the baseline information.

Well-being of Future Generations Act 2015

- 1.11 Pembrokeshire’s Wellbeing Assessment has been finalised (April 2017) with the Wellbeing Plan anticipated for publication by May 2018. The Plan will replace the Single Integrated Plan.
- 1.12 The Well-being of Future Generations Act 2015 concerns the embedding of the principle of sustainable development into all of the work carried out by public bodies and places a requirement on all public bodies to set out how they will progress the 7 well-being goals set out in the Act. As overarching sustainable development framework for Wales it is essential that sustainability appraisal of Pembrokeshire Coast National Park Authority’s replacement Local Development Plan has full regard for the Act and its goals. The Local Development Plan Manual Edition 2 also considers that a sound Local Development Plan must have regard for the Well-being goals of the Act. This will be done through the Sustainability Appraisal of the replacement Local Development Plan and the Equalities Impact Assessment.
- 1.13 The Sustainability Appraisal Scoping Report has examined the compatibility and coverage between the Sustainability Appraisal Objectives and the 7 well-being goals of the Well-being of Future Generations Act 2015. The

³ [Pembrokeshire Coast National Park - National Park Management Plan](#)

⁴ National Park Management Plans Guidance, 2007 Countryside Council for Wales & Welsh Assembly Government paragraph 4.45, page 26.

⁵ See [6. Glossary of Terms](#)

Sustainability Appraisal Objectives are largely compatible with the Well-being goals, with the majority of the goals being contributed to by at least seven of the Sustainability Appraisal Objectives. The exception is “A more equal Wales”, which has very minimal coverage within the Sustainability Appraisal criteria. The Plan’s Equalities Impact Assessment will ensure that this well-being goal is more effectively considered during the Local Development Plan revision (see below).

- 1.14 The Vision and Objectives Background Paper⁶ gives an appraisal of the Local Development Plan vision and objectives against the Well-being goals. Overall, they show a positive complementarity across all the goals. The Local Development Plan objectives particularly support ‘A prosperous Wales’, ‘A resilient Wales’, ‘A Wales of vibrant communities’ and ‘A globally-responsible Wales’.
- 1.15 The Deposit Local Development Plan is due for publication circa May 2018. As the emerging Wellbeing Plan is developed the Deposit Plan drafting will be tested to ensure that the Plan fits with the Wellbeing Plan.

Engagement

- 1.16 The draft strategy has been developed since June 2016 when the Authority’s Review Report⁷, Delivery Agreement⁸ and Sustainability Appraisal Scoping report⁹ were completed. Liaison included the Authority’s Members and external key stakeholders including Town and Community Councils. The Authority’s Delivery Agreement sets out the approach taken to engagement. A variety of means were used to help with the development of the strategy.
- 1.17 Representatives of neighbouring planning authorities have also been met or contacted to discuss the emerging Strategy.

Sustainability Appraisal and Habitats Regulations Assessment¹⁰

- 1.18 Sustainability Appraisal has been used to select the most sustainable policy option from the alternatives examined. This involved assessing the likely performance of policy options against a framework of environmental, social and economic sustainability objectives. These sustainability objectives were arrived at through identifying sustainability issues for the National Park as indicated by national policy and guidance, current knowledge and statistics, and the views of government and non-governmental agencies working in the National Park. The development of these objectives was subject to a public consultation as part of the scoping stage of the Sustainability Appraisal.

⁶ [‘Vision and Objectives’](#)

⁷ [Review Report](#)

⁸ [Pembrokeshire Coast National Park - Delivery Agreement](#)

⁹ [Sustainability Appraisal Scoping Report](#)

¹⁰ [Please see Pembrokeshire Coast National Park - Appraisal Processes](#)

1.19 The Sustainability Appraisal incorporates a Strategic Environmental Assessment.¹¹ A Habitats Regulations Assessment screening and assessment will be prepared separately at Deposit Plan Stage.

1.20 Please note that in limited instances the most sustainable policy option was not the preferred option selected. This happened where the soundness tests showed that a less sustainable policy option was necessary to meet the soundness tests.¹²

Equalities Impact Assessment¹³

1.21 In the formative stages of our policies, procedure, practice or guidelines, the Authority needs to take into account what impact its decisions will have on people who are protected under the Equality Act 2010 (people who share a protected characteristic of age, disability, gender (sex), gender reassignment, marriage/civil partnership, pregnancy and maternity, race, religion or belief, sexual orientation). This work is being taken forward as part of the Sustainability Appraisal on the Local Development Plan and by preparing an Equalities Impact Assessment.

Tests of Soundness¹⁴

1.22 In order to be adopted, a Local Development Plan must be determined 'sound' by the examination Inspector (S64 of the 2004 Act). Tests of soundness tests and checks are identified in Planning Policy Wales, Edition 9, November 2016 (ch2) and the Local Development Plan Manual Edition 2 August 2015 (ch8). Background Paper Alternative Options & Appraisal provides a commentary on the tests of soundness (and the sustainability appraisal summary) for each policy of the Plan.¹⁵

Candidate Sites¹⁶

1.23 Externally, developers and agents and organisations submitted sites for consideration. These were assessed as to their suitability for development using the Candidate Site Assessment Methodology.¹⁷ Those considered to accord with the Preferred Strategy and those which do not are listed in the Register.

Key Diagram, Proposals Map & Constraints Map

1.24 The Key Diagram is included with the Preferred Strategy to illustrate the Plan's spatial strategy.

¹¹ See 6. Glossary of Terms

¹² Please see Alternative Options & Appraisal Background Paper

¹³ Please see Pembrokeshire Coast National Park - Appraisal Processes.

¹⁴ <http://gov.wales/topics/planning/policy/ppw/?lang=en> and Welsh Government | Local Development Plan Manual - Edition 2 (2015)

¹⁵ Please see Alternative Options & Appraisal Background Paper

¹⁶ Candidate Sites Register:

<http://www.pembrokeshirecoast.org.uk/default.asp?PID=797>

¹⁷ [Candidate Site Methodology Background Paper](#)

- 1.25 The Proposals Map will be prepared alongside the Deposit Local Development Plan. The Proposals Map will be on an Ordnance Survey base: illustrating each of the Plan's policies and proposals with a spatial component; showing allocated sites, Centre boundaries and safeguarding areas, etc.; defining areas to which specified development management policies will be applied. Where spatial delineations are determined by other mechanisms they will not need to be shown on the Proposals Map - a Constraints Map will be used to show these delineations at Deposit stage.
- 1.26 The Constraints Map will show, for example, spatial delineations determined by mechanisms other than the Local Development Plan (e.g. by TAN15 Development Advice Maps); this is considered beneficial in that the map can be amended readily to take account of changes that are not determined by the Local Development Plan. A Constraints Map, unlike the Proposals Map, is not a statutory requirement and is not part of the Local Development Plan.¹⁸
- 1.27 The designations which will be shown on the Constraints Map are:
- a) Scheduled Monuments
 - b) Historic Landscape Areas
 - c) Historic Parks and Gardens
 - d) Conservation Areas
 - e) Special Areas of Conservation
 - f) Special Protection Areas
 - g) Sites of Special Scientific Interest
 - h) National Nature Reserves
 - i) Local Nature Reserves
 - j) Marine Conservation Zones
 - k) Coal High Risk Areas
 - l) Technical Advice Note 15 Flood Extents
 - m) Hazard Zones

¹⁸ See Review Report June 2016 paragraph 100.

2. Where we are now - National Park Portrait

- 2.1 A review has been carried out for the first Local Development Plan. This has been updated with regard to:
- a) identifying the Park's key attributes
 - b) identifying key messages in relevant Acts, Plans and Strategies for the National Park
 - c) showing what is going well for the National Park Local Development Plan adopted in 2010 and what key matters need addressing¹⁹
 - d) showing what matters the Authority as well as various stakeholders consider to be of significance
 - e) explaining the Park's role in the wider regional and national context.
- 2.2 The preparatory work can be found on the Authority's website.²⁰
- 2.3 What has been retained through the above analysis are six key priority issues that need to be addressed by this Local Development Plan. These issues must be addressed within a context of needing to achieve National Park purposes which are:
- a) 'to conserve and enhance the natural beauty, wildlife, and cultural heritage²¹ of the National Parks.'²²
 - b) 'to promote opportunities for the understanding and enjoyment of the special qualities [of the Parks] by the public.'²³
- 2.4 These are underpinned by the Sandford Principle which asserts the primacy of the first purpose over the second in cases of irreconcilable conflict.²⁴ Reflecting that National Parks are living 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.²⁵

¹⁹ See Pembrokeshire Coast National Park Local Development Plan Review Report Adopted June 2016

²⁰ Replacement Local Development Plan

²¹ See 6. Glossary of Terms

²² Section 61 of the Environment Act 1995

²³ Section 61 of the Environment Act 1995

²⁴ Section 62 of the Environment Act 1995

²⁵ Section 62 of the Environment Act 1995

Key issues to address

National Park Purposes

- Ensuring that government planning policy which is unique to National Parks is appropriately applied.

A. Special qualities

- How can the National Park's special qualities be protected for future generations? Can opportunities be taken to enhance those special qualities with new development?

B. Major development, the potential for growth

- In trying to meet the needs of local communities, how to make rational choices or decide on priorities where the need for land for development is greater than supply of suitable land. The Park is unable to accommodate all demands.²⁶
- Given the shape and nature of the National Park it is important to recognise that it is highly dependent on the strategies of Pembrokeshire and of the wider West Wales area, in particular spatial strategies.

C. Climate change, sustainable design, renewable energy, flooding

- More has to be done to address factors contributing to climate change, and to manage and adapt to the effects of climate change.

D. Visitor economy, employment and rural diversification

- How to find an approach to development in the countryside which helps sustain and diversify rural communities yet guards against unsustainable development in countryside locations.
- How in land use planning terms can the National Park tackle seasonality in the visitor economy?
- The visitor economy does over-dominate in certain locations in the Park and this needs proactive management.
- How to maintain and enhance the visitor economy.

E. Affordable housing²⁷ and housing growth

- How to tackle affordable housing need²⁸ in the Park.

²⁶ The ability of the National Park landscape to absorb development for this Plan period is tested using the methodology set out in the ['Candidate Site Methodology Background Paper'](#).

²⁷ See [6. Glossary of Terms](#)

F. Community facilities

- How to continue to protect and enhance our range of community facilities in the National Park which are highly valued and needed facilities many of which are in locations remote from larger centres.
- How to ensure the existing town, district and smaller shopping centres of the Park which serve local need and the needs of visitors remain attractive, diverse and viable.
- How to improve accessibility²⁹ to and within the National Park whilst recognising the need to reduce the impact of motorised traffic and travel on the environment.

²⁸ See 6. Glossary of Terms

²⁹ See 6. Glossary of Terms

3. Where we want to be – Vision and Objectives

Vision

3.1 The vision for the National Park below describes the land use elements of the National Park Management Plan Vision³⁰. It:

- has a 15 year horizon
- is particular to this National Park
- takes account of the Welsh 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 surveys³¹

Local Development Plan Vision for the Pembrokeshire Coast National Park 2031

3.2 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.

3.3 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 at the Plan's 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.

3.4 New development has been predominantly directed to communities with adequate services and amenities and 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

³⁰National Park Management Plans are of national importance. National Park Management Plan objectives and policies therefore prevail over regional and local policy as it is delivered in National Parks. Indeed the imperatives of National Park purposes should be reflected in these other Plans, including the Local Development Plan – paragraph 4.45, page 26, National Park Management Plans Guidance 2007, Welsh Assembly Government and the Countryside Council for Wales, 2007.

³¹ See Background Paper 'Vision and Objectives' and the Community Consultation Background Paper.

of transport for our communities as well as support for increased recreational activity.

- 3.5 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.
- 3.6 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.

Objectives

- 3.7 The objectives below set out how the Vision will be achieved to tackle the priority issues identified in Chapter 2. They derive from the National Park Management Plan and are refined to relate to land use planning matters and to identify what will be the key outcomes the Authority anticipates will be achieved during the life of the Local Development Plan. The strategy and policies of the Plan and the Monitoring section of the Local Development Plan provide more information on what is expected.
- 3.8 These objectives are set within a context of needing to achieve National Park purposes which are:
 - a) 'to conserve and enhance the natural beauty wildlife, and cultural heritage of the National Parks.'³²
 - b) 'to promote opportunities for the understanding and enjoyment of the special qualities [of the Parks] by the public.'³³
- 3.9 These are underpinned by the Sandford Principle which asserts the primacy of the first purpose over the second in cases of irreconcilable conflict.³⁴ Reflecting that National Parks are living 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.³⁵

A. Special Qualities

Historic Environment³⁶

³² Section 61 of the Environment Act 1995

³³ Section 61 of the Environment Act 1995

³⁴ Section 62 of the Environment Act 1995

³⁵ Section 62 of the Environment Act 1995

³⁶ See 6. Glossary of Terms

- To conserve, enhance and promote the historic environment of the National Park, its archaeological resource, historic buildings and landscapes, parks and gardens (Policy 8, and Policy 14).

Biodiversity and Geodiversity

- To conserve and enhance appropriate habitats and species within the National Park and where appropriate to protect and promote the geological resource (Policy 8, Policy 10 and Policy 11).

Landscape and Seascape

- To conserve and enhance the special landscape and seascape character of the National Park (Policy 8 and Policy 15).

Welsh Language and Culture

- To conserve and enhance the cultural richness of the National Park (Policy 8 and Policy 12).

Key outcomes

- (1) The special qualities of the National Park have been conserved and enhanced.

B. Major development, the potential for growth

Scale and Location of Growth

- To promote a spatial strategy that minimises the need to travel. (Policy 2, Policy 3, Policy 4, Policy 5, Policy 6, Policy 7) 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 35, Policy 42, Policy 44, Policy 45 and Policy 48).

Minerals

- No new mineral workings or extensions to existing mineral workings will be allowed within the National Park other than in exceptional circumstances³⁷ (Policy 21 to Policy 26).

Waste

- To provide local waste facilities for National Park waste or secure facilities outside the National Park to deal with this waste (Policy 27 and Policy 28).

³⁷ Planning Policy Wales, Edition 9, November 2016, paragraph 14.3.2

Ministry of Defence

- No intensification of use or extension of Ministry of Defence sites will be allowed save in exceptional circumstances.³⁸

Key outcomes

- (2) Development takes place in accord with the strategy of the Local Development Plan.
- (3) Development permitted helps to sustain local communities
- (4) No new major development in the National Park unless there are exceptional circumstances.³⁹
- (5) The provision of waste facilities which predominantly serve the National Park area⁴⁰

C. Climate change, sustainable design, renewable energy, flooding

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.⁴¹ (Policy 9)

Renewable Energy

- To improve energy conservation and efficiency and to contribute to national targets for renewable energy. (Policy 33)

Soil, Air and Water Quality

- To safeguard and enhance the soil, air and water quality of the National Park.^{42 43}

Sustainable Design

³⁸ Planning Policy Wales, Edition 9 , Welsh Government, November 2016 paragraphs 5.5.5 and 5.5.6

³⁹ See Planning Policy Wales, Edition 9 November 2016 , paragraph 5.5.6 and 14.3.2; Minerals Technical Advice Note 1: Aggregates 2004, paragraph 52; Mineral Technical Advice Note (MTAN) Wales 2: Coal, paragraphs 74 to 79, page 159,

⁴⁰ Technical Advice Note 21: Waste - Areas of Search Maps for sub regional waste facilities excludes National Parks

⁴¹ Planning Policy Wales, Edition 9, November 2016, Welsh Government, Chapter 12 and 13.

⁴² Planning Policy Wales, Edition 9, November 2016, Welsh Government, Chapters 12 and 13.

⁴³ Water Framework Directive (2000/60/EC).

- The design of all development in the National Park reflects its special landscape and townscape qualities and local distinctiveness, meets the highest standards for resource use including minimising waste, and takes account of the impact of a changing climate (Policy 9, Policy 29, Policy 30, Policy 31, and Policy 32).

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 (Policy 8, Policy 17, Policy 18, Policy 33 and Policy 34).

Flooding

- 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 34)

Key outcomes

- (6) Development achieving high standards in terms of sustainable design with all new dwellings meeting the standards set out in national planning policy.
- (7) The National Park contributing to renewable energy generation.⁴⁴
- (8) No vulnerable development⁴⁵ in areas which would be at risk of flooding both now and in the long term and with no negative impacts elsewhere.

D. 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 (Policy 42 and Policy 43).

Enjoyment

- To attract a sustainable number of people at all times of the year to enjoy the special qualities of the National Park. (Policy 35)

⁴⁴ Please see '5. Monitoring' chapter of the Plan. Likely contributions are taken from the Renewable Energy Assessment weblink: <http://www.pcnpa.org.uk/website/default.asp?SID=1317&SkinID=5>

⁴⁵ 'Vulnerable developments' are defined in the Technical Advice Note 15: Development and Flood Risk on flooding, please see Figure 2 page 7: weblink <https://naturalresources.wales/our-evidence-and-reports/maps/flood-risk-map/?lang=en>

Key outcomes

- (9) The National Park contributes to the provision of new employment and existing sites are safeguarded.
- (10) A range of holiday accommodation is available to meet the varying needs of visitors
- (11) Recreational and visitor activities do not damage the special qualities of the National Park

E. Affordable housing and housing growth

Housing

- To provide for housing to facilitate the delivery of affordable housing needs without compromising National Park purposes (Policy 44, Policy 45, Policy 46 and Policy 47).

Key outcomes

- (12) An estimated **XXXX** new dwellings are delivered of which a minimum of **XXX** are affordable (figures to be added at Deposit stage).
- (13) A higher density of development is achieved – a minimum of 30 dwellings to the hectare in the Local Development Plan's Centres⁴⁶.

F. 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 (Policy 48).

Retail

- To maintain a vital and viable retail sector at an appropriate scale and at appropriate locations throughout the National Park (Policy 49 and Policy 50).

Transport

- To improve and promote accessibility⁴⁷ 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 2, Policy 3, Policy 4, Policy 5, Policy 6, Policy 7, Policy 52, Policy 53 and Policy 54).

Utilities

⁴⁶ See [6. Glossary of Terms](#)

⁴⁷ See [6. Glossary of Terms](#)

- To ensure adequate provision of utilities⁴⁸ for local communities and that this provision is compatible with the National Park designation and protection of its resources.

Key outcomes

- (14) Existing community facilities are safeguarded and provision enhanced.
- (15) The National Park retail centres are vibrant and diverse.
- (16) Proposals that could have potentially caused significant concerns regarding traffic have been avoided.

A background paper entitled 'Vision and Objectives' sets out how the objectives above relate to the vision.


4. How we get there – Local Development Plan strategy and policies

Translating the vision and objectives into a Local Development Plan strategy and policies

- 4.1 The previous chapter set out a vision of 'where we want to be' and suggested some of the key outcomes which we will be looking to achieve in the Local Development Plan Period – by 2031. The purpose of this chapter is to address the question 'how do we get there' by setting out the spatial strategy and policies needed to realise the Local Development Plan's vision and objectives.
- 4.2 The portrait in chapter 2 describes the kind of place Pembrokeshire Coast National Park is today. It has much strength: its attractiveness, the contribution of its environment to the local and national economy; its rich diverse culture; biodiversity and geodiversity and its quality of life. It is an enjoyable place to visit and keep healthy.
- 4.3 With this strength comes certain weaknesses; houses are expensive and difficult to afford, opportunities for house building and development more generally are limited. There is competition for housing from buyers of holiday and second homes. Issues of social exclusion arise as a consequence. Some popular areas become congested in the holiday season but are unable to justify a local bus service in the winter months.
- 4.4 The Pembrokeshire Coast National Park, by reason of its designation as an area of special landscape character, imposes fairly severe restrictions on development that would harm its special qualities. In addition, given

⁴⁸ See 6. Glossary of Terms

that it is a predominantly rural area, the spatial scale of individual areas of change is not significant.

- 4.5 Guidance⁴⁹ advises that a generic 'rural strategy' approach may be more appropriate than exploring alternative spatial strategies and alternative sites within areas of change. Such an approach would consider broad policy options and principles with regard to issues such as affordable housing, village scale allocations, the role and development of market towns, diversification, the hierarchy and roles in terms of service provision etc.
- 4.6 This is the approach that has been taken here. However, given the shape of the National Park, the level of growth and its spatial distribution account needs to take of its position relative to neighbouring authorities. In this respect account has also been taken of the preparatory work for the Wales Spatial Plan update 2008 in terms of exploring spatial options (see paragraph 4.14 onwards).
- 4.7 The strategy and policies below tackles the six priority issues identified in Chapter 2 'Where are we now?' and sets out a policy response to achieve the land use aspects of the vision and the objectives for the area as set out in Chapter 3. Where key actions outside the Local Development Plan are needed to support achievement of these policies these are also set out.
- 4.8 To remind you the six priority issues are:
- a) Special qualities
 - b) Major development, the potential for growth
 - c) Climate change, sustainable design, flooding, sustainable energy
 - d) Visitor economy, employment and rural diversification
 - e) Affordable housing and housing growth
 - f) Community facilities
- 4.9 Policy responses are grouped under the six priority issues except those in relation to National Park purposes and duty and the spatial elements of the Plan which have been brought to the front of Chapter 4. Strategy policies are identified by the suffix 'Strategy Policy' and coloured with a yellow background. Supporting policies are coloured with a blue background.
- 4.10 The Plan has been heavily influenced by the Sustainability Appraisal and the application of the tests of soundness⁵⁰. Where other mutually exclusive policy options were explored the preferred strategy policy in the main text is highlighted with a  symbol. A summary explanation is provided as to what those other options were and why they were discarded in the Alternative Options Background Paper. Alternatives to the

⁴⁹ LDP Manual, Welsh Government, paragraph 6.2.3.4 August 2015, page 64.

⁵⁰ See 6. Glossary of Terms

preferred spatial strategy are also set out in this Background Paper.⁵¹ When a choice of options is available those options that perform best when considering both the sustainability appraisal scoring and the outcomes of the soundness tests together were chosen.

⁵¹ Please see [Alternative Options & Appraisal Background Paper](#)

National Park Purposes and Duty and the Spatial Strategy

National Park Purposes and Duty

- 4.11 There is one overarching policy in the Plan which deals with National Park purposes and duty.
- 4.12 National Park purposes are set out in the 1995 Environment Act. It could be suggested that inserting a policy is merely restating legislation but the two purposes coupled with the duty are so fundamental to the work of the Park Authority it is important to place them at the centre of the Local Development Plan.
- 4.13 Whilst the National Park is a landscape designation there are instances where strict application of the boundary in making decisions would not be appropriate. Cross boundary issues include wind energy development, seaward developments and transport infrastructure. The Authority will use this policy in considering proposals within its planning jurisdiction and in commenting on proposals outside of the National Park.

Policy 1 NATIONAL PARK PURPOSES AND DUTY (Strategy Policy)

Development within the National Park must be compatible with:

- a) the conservation and enhancement of the natural beauty, wildlife and cultural heritage of the Park, and
- b) the public understanding and enjoyment of the special qualities.⁵²

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.

Spatial Strategy

- 4.14 The strategy for locating growth for the National Park is the Wales Spatial Plan⁵³ Pembrokeshire Haven Settlement Framework strategy. The Wales Spatial Plan preferred strategy was chosen for the 1st Local Development Plan because it delivered most in terms of the Sustainability Appraisal

⁵²These purposes are underpinned by the Sandford Principle which asserts the primacy of the first purpose over the second in cases of obvious conflict.

⁵³ See [6. Glossary of Terms](#)

objectives and the soundness tests required that regard was had to the Wales Spatial Plan.⁵⁴

- 4.15 The Local Development Plan appraisal of Wales Spatial Plan Option 3 considered that additional tiers (Tiers 4 'Rural Centres' and 5 'Countryside') were needed with development being targeted to locations that would be likely to be more accessible and more likely to support community facilities. The approach would help with conserving the National Park landscape and the strategy was quite tailored for individual settlements.
- 4.16 This preferred option is known as Option 4 'Focused Key Settlement/Hybrid Approach (with two additional Tiers)' and is the spatial strategy in the current adopted Local Development Plan.
- 4.17 The main spatial elements of the strategy are shown in the Key Diagram - see attached. This element of the strategy should be read within the context of the wider strategy in particular the overarching Policy 1 which deals with the National Park purposes and duty.
- 4.18 The overall aim of the framework for the Pembrokeshire Haven area is to achieve greater prosperity, attract inward investment, direct development to the main towns on the economic corridor, help sustain rural communities, achieve sustainability principles and protect the National Park.⁵⁵
- 4.19 Options Considered and Preferred Approach: This framework (Focused Key Settlement) when tested against other options⁵⁶ (in the sustainability appraisal) performed better in terms offering the clearest benefits for sustainability with employment, housing, environment and physical regeneration. It emphasises public transport and Information and Communication Technology improvements with additional measures aimed at addressing economic diversification, the development/retention of skills, housing affordability, environmental stewardship and mitigation⁵⁷ of and adaptation to climate change effects.⁵⁸
- 4.20 The Pembrokeshire Haven area has three strategic hubs, The Haven (Haverfordwest, Milford Haven/Neyland and Pembroke/Pembroke Dock), Carmarthen Town and Fishguard/Goodwick. These hubs will provide a regional role and will be a major focus for future investment and are known as Tier 1 Centres (apart from Fishguard/Goodwick). These hubs lie outside the National Park.
- 4.21 Towns and villages in the National Park have lower order roles and are included as either Tier 2 or Tier 3 Centres.

⁵⁴ Please see Alternative Options & Appraisal Background Paper

⁵⁵ Wales Spatial Plan, Pembrokeshire Haven, Key Settlement Framework 2021, page 21

⁵⁶ Other options considered for the Wales Spatial Plan were 'Dispersed Strategy Growth', 'Two Centre Strategy'

⁵⁷ See 6. Glossary of Terms

⁵⁸ Please see Alternative Options & Appraisal Background Paper

- a) Tier 2...Centres have a service centre, employment and tourism function.
- b) Tier 3...Centres are principally local centres with some being significant tourism centres.

4.22 To complement the Spatial Plan framework, which deals with the more strategic levels of the hierarchy in the Park, two additional tiers are proposed by the Authority:

- a) Tier 4 'Rural Centres' are identified for limited growth. These Centres have a limited range of facilities which should meet the day to day needs of residents. This approach should help sustain rural communities and reduce the need to travel.
- b) Tier 5 'Countryside' where in accordance with national planning policy development is strictly controlled except for certain forms of development that would normally be found in a countryside location.

4.23 Options Considered and Preferred Approach: Two options were considered regarding the spatial planning outside the Tier 2 and 3 Centres:

- a) Adopt and compliment the Wales Spatial Plan approach (as set out above)
- b) the Joint Unitary Development Plan strategy.

4.24 The adopt and compliment option known as 'Focused key Settlement/Hybrid Approach' was the more sustainable option.⁵⁹ This option would help sustain rural communities and reduce the need to travel. Access to services are an important consideration. This strategy underpins Policies 2 to 7 of the Local Development Plan.

4.25 When defining the extent of development permitted in Centres 'Centre boundaries' will be used except where this is not compatible with the character of the Centre (to be shown on the Deposit Plan).

Tenby – Local Service and Tourism Centre

4.26 Background: Tenby is identified as a local service and tourism centre along with Fishguard/Goodwick, St Clears, Whitland and Narberth (Tier 2 Centres). Only Tenby lies in the National Park.

4.27 Tenby is located on the south Pembrokeshire coast. Tenby has an estimated resident population of 4,517.⁶⁰ It is an attractive historic walled town, (part of which has been designated a Conservation Area), with fine beaches. It has a working harbour where there is a constant bustle and visitors often spend time just watching the life of the harbour. It hosts a

⁵⁹ Please see Pembrokeshire Coast National Park - Appraisal Processes

⁶⁰ See Scale and Location of Growth Background Paper for more information on how this figure was calculated.

wide variety of community facilities catering for all ages and tastes and it has a good bus service, a railway station and is located on the National Cycle Network. Tenby town centre is the leading retail centre of the Park but a lower order retail centre relative to other retail centres within the region including Carmarthen and Haverfordwest. Tenby serves a rural hinterland which includes areas outside of the National Park.

4.28 Issues for Tenby: Tenby has suffered some decline in tourism and with a historically buoyant property market this has led to the loss of hotel accommodation. Since the introduction of a policy of protection in earlier Plans unnecessary loss has been averted. Protecting against further loss where unjustified remains however an important consideration. Tenby continues to be a significant visitor centre as highlighted in the Wales Spatial Plan update.⁶¹ There has been limited development of affordable housing, and the number of dwellings that are either second homes or holiday accommodation continue to be a concern. There are a number of traffic management issues giving concern, particularly congestion during the summer months.⁶² There are amenity concerns about take-away and late night opening in Tenby Town Centre. There is a lack of all year round employment opportunities. Tenby has a regular rail service. The South Beach area is at risk from flooding but it should not impair Tenby's potential to act as a Local Service and Tourism Centre – see also Policy 34. There are issues in relation to sewage disposal.⁶³

4.29 Tenby by 2031: Tenby at the end of the Local Development Plan period is a quality tourism destination with a range of quality accommodation. Key buildings and sites in the area continue to be redeveloped to help regenerate the Centre. The harbour is protected and enhanced with linkages to Caldey Island. Traffic is well managed and complements Tenby's role as a Local Service and Tourism Centre. The town centre is still the leading retail centre in the Park. New housing developed in the town contains a substantial element of affordable housing.⁶⁴

Policy 2 TENBY LOCAL SERVICE AND TOURISM CENTRE
(TIER 2)⁶⁵(Strategy Policy)



⁶¹ See page 112, Wales Spatial Plan update 2008

⁶² There is a permanent Traffic Regulation Order in place for the seasonal pedestrianisation scheme within Tenby Town Walls. Traffic exclusion operates during the main summer holiday season. Further details are available from <http://www.pembrokeshire.gov.uk/content.asp?nav=838,1073>

⁶³ See Scale and Location of Growth Background Paper Appendix 2

⁶⁴ Wales Spatial Plan, Pembrokeshire Haven, Key Settlement Framework 2021, page 14 & the Sustainable Regeneration Framework for Pembrokeshire Haven Spatial Plan area, 18 July 2007 version, pages 12, and 24

⁶⁵ See Policy 35.

Tenby is designated a 'Local Service and Tourism Centre' where the land use priorities will be:

- a) to provide for and or permit housing to facilitate the delivery of the affordable housing needs of the local area.⁶⁶
- b) to permit proposals for small scale employment development to meet the needs of the local area.
- c) to protect and enhance the town's facilities and town shopping centre which serve the needs of the local area.
- d) to protect and enhance the harbour area.⁶⁷
- e) to ensure developments permitted contribute to the protection and enhancement of the town's special qualities⁶⁸
- f) to permit proposals that assist in delivering improved traffic management in the town.

Newport – Local Centre

4.30 Background: Newport with an estimated population of 860⁶⁹ residents nestles in an outstanding landscape setting⁷⁰ on gentle slopes between the foot of Carn Ingli and the quiet Afon Nyfer Estuary, which is itself protected from the open sea by the sand dunes and bars of Newport Sands. The panoramic view of the town and the Parrog (once the busiest harbour in north Pembrokeshire) from Newport Sands illustrates this perfectly as one of the best known and loved in the National Park. Visitors to Newport swell its population during the holidays.

4.31 Newport has a good range of facilities serving the town and the hinterland, and is classified as a 'district shopping centre' by Policy 49. It has a distinctive culture with a significant number of Welsh speakers leading to a strong sense of community. There are two Conservation Areas designated in recognition of Newport's distinctive character. It has a magical quality and the natural environment and peacefulness of the area are highly valued. It has a small employment park and business centre. Newport has a bus service during the week but this does not satisfy the community's

⁶⁶ See Policies 44 and 45

⁶⁷ See Policy 18.

⁶⁸ Landscape Character Assessment Supplementary Planning Guidance June 2011, LCA2

⁶⁹ See Scale and Location of Growth Background Paper for more information on how this figure was calculated.

⁷⁰ designated as a Landscape of Special Historic Interest in Wales

evening and Sunday requirements. It is located on the National Cycle Network.

- 4.32 Issues for Newport: Difficulties for Newport include high house prices and a shortage of land for developing affordable housing. A high number of holiday and second homes is of concern as is an ageing population. The use of the Welsh language is declining. A general upgrading of community facilities is also considered necessary as is the developing of Newport as an attraction for tourism. Additional employment opportunities would be welcomed. Traffic volumes and turning movements continue to impact on the town despite measures being introduced in the past. Further improvements to traffic management would be welcomed including improvements to pedestrian safety and parking. The area around Newport Parrog, Newport Sands and the Nyfer Estuary are at risk from flooding but it should not impair Newport's potential to act as a Local Centre – see also Policy 34.
- 4.33 Newport by 2031: The future for Newport by the end of the Local Development Plan period will see it having had new housing developed in the town including a substantial element of affordable housing. Community and retail facilities are adequate to serve the town and rural hinterland. Where feasible, traffic management measures have been introduced. The town's role as an attractive historic local centre has been protected and the town offers a range of holiday accommodation for its visitors.

Policy 3 NEWPORT LOCAL CENTRE (TIER 3) (Strategy Policy) ★

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

- a) to provide for and or permit housing to facilitate the delivery of the affordable housing needs of the local area.⁷¹
- b) to permit proposals for small scale employment development to meet the needs of the local area.⁷²
- c) to protect and enhance the district shopping centre and community facilities which serve the town and rural hinterland
- d) to ensure developments permitted contribute to the protection and enhancement of the town's special qualities⁷³

⁷¹ See Policies 44 and 45

⁷² See Policy 42.

⁷³ Landscape Character Assessment Supplementary Planning Guidance June 2011, LCA23

e) to permit proposals that assist in delivering improved traffic management in the town.

Saundersfoot – Local Centre

- 4.34 Background: Saundersfoot is a small (estimated population of 2,473)⁷⁴ but very popular family resort. The village has substantially grown since the 1950s. Buildings spread over the wooded hill slopes rising either side of the small flat-bottomed valley which bisects the village. The centre of Saundersfoot and the harbour area is designated a Conservation Area. Historically coal was mined in the area, and coal and tin exported. Tourism is now the principal industry, although the harbour at the heart of the village, is well used by pleasure craft and a number of small fishing boats and retains a bustling workaday character. Funding from the European Union and Tourism Infrastructure Support Scheme has contributed to the long-term viability of the harbour by improving access from the sea and extending coastal tourism activity. It is also the focus for a commercial area containing shops, restaurants and other businesses. Saundersfoot has a very good bus service and ‘compact’ village amenities. Policy 49 identifies Saundersfoot as a ‘district shopping centre’.
- 4.35 Issues for Saundersfoot: Issues for Saundersfoot include the need to complete the enhancement of the harbour area, the need to extend the holiday season, There are also amenity concerns about take-away and late night opening in Saundersfoot. Although the rail service is regular, the station is over a mile from the village. Holiday/second homes are of concern and there is a need to provide affordable housing. Generally, access from the north to the south of the village is poor. Saundersfoot village centre may face a potential long-term threat of flooding due to sea level rises and will need to be ready to have a strategy in place to allow the village and its community to adapt to such change. The situation will be monitored using information emerging to support Policy 34.
- 4.36 Saundersfoot by 2031: The future for Saundersfoot by the end of the Local Development Plan period will see it having had new housing developed in the village including a substantial element of affordable housing. Community and retail facilities are adequate to serve the needs of the local community. Traffic is well managed. The village’s seaside character has been protected and enhanced, including its harbour, and the hotel and guest house accommodation is adequate to serve the needs of visitors. The shopping and harbour areas are attractive and inviting.⁷⁵

⁷⁴ See [Scale and Location of Growth Background Paper](#) for more information on how this figure was calculated.

⁷⁵ [Wales Spatial Plan](#), Pembrokeshire Haven, Key Settlement Framework 2021, page 15 & the Sustainable Regeneration Framework for Pembrokeshire Haven Spatial Plan area, 18 July 2007 version, pages 12, and 25

Policy 4 SAUNDERSFOOT LOCAL CENTRE (TIER 3) (Strategy Policy) ★

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

- a) to provide for and or permit housing to facilitate the delivery of the affordable housing needs of the local area.⁷⁶
- b) to permit proposals for small scale employment opportunities to meet the needs of the local area.
- c) to protect and enhance the district shopping centre and community facilities to meet the needs of the local area.
- d) to ensure developments permitted contribute to the protection and enhancement of the village's special qualities⁷⁷
- e) to permit proposals that assist in delivering improved traffic management in the village and accessibility to the railway station
- f) to protect and enhance the harbour.⁷⁸

St Davids – Local Centre

- 4.37 Background: St Davids City enjoys a truly outstanding natural setting on the windswept coastal platform which forms the St Davids Peninsula. The cathedral being the main focus for visits to St Davids, dates predominantly from the 12th-16th century.
- 4.38 Today, St Davids and its peninsula forms one of the most important tourism resources in the National Park. The Wales Spatial Plan Framework acknowledges the important role St Davids plays as a tourist destination.
- 4.39 St Davids has an estimated population of 1,309⁷⁹ with a comparable range of facilities to Saundersfoot and Newport. The National Cycle Network also runs through the City.

⁷⁶ See Policies 44 and 45

⁷⁷ Landscape Character Assessment Supplementary Planning Guidance June 2011, LCA1

⁷⁸ See Policy 18

⁷⁹ See Scale and Location of Growth Background Paper for more information on how this figure was calculated.

- 4.40 Issues for St Davids: Neighbouring St Justinians and Whitesands Bay area also major tourist attractions which bring visitors to the area and add to the traffic management issues in and around St Davids. The existing Celtic Coaster service plays a part in resolving these issues. Affordable housing provision is necessary and the impact of second and holiday homes is a concern.
- 4.41 St Davids by 2031: The future for St Davids by the end of the Local Development Plan period will see it having had new housing developed in the town including an element of affordable housing. Significant cultural investment has taken place with the Cathedral Cloisters project and the Landscape Gallery Oriol y Parc. Community and retail facilities are adequate to serve the needs of the local community. Traffic management measures have mitigated the adverse impacts of through traffic and traffic movements within the town and have addressed the traffic management issues at St Justinians. The City's role as an attractive historic centre is protected and enhanced and the hotel and guest house accommodation is adequate to serve the needs of visitors.⁸⁰

Policy 5 ST DAVIDS LOCAL CENTRE (TIER 3) (Strategy Policy) ★

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

- a) to provide for and or permit housing to facilitate the delivery of the affordable housing needs of the local area.⁸¹
- b) to permit proposals for employment development to meet the needs of the local area.⁸²
- c) to protect and enhance the district shopping centre and community facilities which serve the City and rural hinterland
- d) to ensure developments permitted contribute to the protection and enhancement of the City's special qualities⁸³
- e) to permit proposals that assist in delivering improved traffic management in the City and wider peninsula.

⁸⁰ Wales Spatial Plan, Pembrokeshire Haven, Key Settlement Framework 2021, page 15 & the Sustainable Regeneration Framework for Pembrokeshire Haven Spatial Plan area, 18 July 2007 version, pages 12, and 25

⁸¹ See Policies 44 and 45

⁸² See Policy 42

⁸³ Landscape Character Assessment Supplementary Planning Guidance June 2011 LCA17

Crymych – Local Centre

- 4.42 Even though Crymych plays an important role for adjacent National Park communities only a small part of Crymych lies within the National Park. The future role of Crymych will be predominantly defined by opportunities outside the National Park.

Rural Centres

- 4.43 Background: To help sustain rural communities in the National Park an additional tier of Centres is identified called 'Rural Centres', listed below, which have at least 3 facilities normally found in a small village⁸⁴ or if less than this, at least 1 convenience shop.
- 4.44 Issues for Rural Centres: The level of service by public transport, sewerage treatment and water supply varies between the towns and villages listed in the hierarchy and improvements will be needed.⁸⁵ Known areas at risk from flooding include parts of Amroth, Angle, Broad Haven, Dale, Felindre Farchog, Little Haven, Llanychaer, Nevern, Newgale, Pontfaen, and Solva. The extent to which these Centres can provide for future development will need to take account of these issues – see also Policy 34. In particular, parts of Newgale close to the shoreline and within the Centre boundary are within a C2 flood zone. A study prepared for Pembrokeshire County Council has highlighted that the current coastal defences have a limited lifespan with consequential effects on the village and main road running along the coast. Pembrokeshire County Council are progressing work to address these issues the outcomes of which will be taken account of in progressing this Local Development Plan to adoption if available.⁸⁶
- 4.45 Rural Centres by 2031: The future for Rural Centres is one where some additional development, including affordable housing development, has helped sustain local facilities and the need to travel to larger centres for day to day needs is no longer required. The accessibility of these centres to larger centres in the Park has also improved along with infrastructural services such as water supply and sewage disposal.
- 4.46 In Rural Centres lying predominantly outside the National Park, opportunities for development are more likely to arise in those areas in the County Council's jurisdiction.
- 4.47 Review Report: The Authority's Review Report has highlighted (paragraph 64) that a review of population estimates, the facilities available,

⁸⁴ Letter box, sports ground, primary school, pub, community hall, place of worship, convenience shop, post office – See Scale and Location of Growth Background Paper.

⁸⁵ Scale and Location of Growth Background Paper

⁸⁶ See Climate Change Background Paper

accessibility by public transport, water supply and sewerage availability for towns and villages around the Park means that new Centres are added to Policy 6 and new Insets Maps included in Deposit Plan. The Review Report, paragraph 103 also refers to the need to highlight and monitor issues regarding the Newgale and flooding (see above).

Policy 6 RURAL CENTRES (TIER 4) (Strategy Policy) ★

In Rural Centres the land use priorities will be:

- a) to provide for and or permit housing to facilitate the delivery of affordable housing for the local area⁸⁷
- b) to permit small scale employment developments⁸⁸
- c) to protect and enhance the Centre's range of facilities.

Rural Centres lying in the National Park

Amroth	Manorbier
Angle	Manorbier Station
Bosherston	Marloes
Broad Haven	Nevern
Dale	Newgale
Dinas Cross	Pontfaen
Felindre Farchog	Rosebush
Herbrandston	Solva
Jameston	Stackpole
Lawrenny	St Ishmaels
Little Haven	Trefin
Lydstep	

Rural Centres lying partly in the National Park

Cosheston ^{*89}	Milton*
Hook*	New Hedges
Houghton*	Pleasant Valley*
Llangwm*	Roch*
	Square and Compass
	Summerhill

⁸⁷ See Policies 44 and 45

⁸⁸ See Policy 42

⁸⁹ *Lies predominantly within the County Council's planning jurisdiction

Countryside

- 4.48 Background and Issues for the countryside: In the National Park countryside there is an estimated third of all households in the National Park which are scattered through small villages, hamlets, sporadic dwellings and farms. The National Park countryside is an important contributor to tourism, farming, conservation etc. Issues for the Park include finding the right approach to the amount of development to be permitted, taking account of accessibility issues, the need to sustain local communities and the need to protect the National Park landscape.
- 4.49 The National Park countryside by 2031: At the end of the Local Development Plan period the National Park countryside will continue to be the setting for many diverse interests and activities whilst respecting one of the Park's finest assets. Some limited development has helped contribute to the quality of life for its communities and visitors through farm diversification projects, conversion of buildings, One Planet proposals that contribute to government's sustainability agenda in the area and through appropriate recreational and visitor activities. To sustain communities whilst respecting national planning policy housing development will have been strictly controlled in the countryside⁹⁰ with some limited opportunities being allowed at appropriate locations outside the Centres listed earlier in the strategy. Converting buildings that contribute to the character of the countryside to a range of uses has assisted with sustaining communities particularly as the delivery of affordable housing through the development of market housing has been prioritised over self-catering. Effort has been made to minimise the need to travel in the countryside in new development through assessing infill and rounding off opportunities in terms their accessibility and through using a more rigorous approach to assessing traffic impact for developments in the countryside see Policy 52 and Policy 53. Supplementary Planning Guidance on accessibility has been prepared under the 1st Local Development. It is intended that this is carried forward and updated under the replacement Local Development Plan.
- 4.50 Given the significant role and potential impact of farming on the National Park countryside Supplementary Planning Guidance⁹¹ on siting and design of farm buildings prepared for the 1st Local Development Plan has been taken forward to support the policies of the replacement Local Development Plan.
- 4.51 Review Report & Options Considered and Preferred Approach: As advised in the Local Development Plan Review Report June 2016 elements of Policy 7 Countryside of the adopted Local Development had issues arising which needed to be addressed in the

⁹⁰ Planning Policy Wales, Edition 9, November 2016, Chapter 9 Housing, paragraph 9.3.6

⁹¹ See 6. Glossary of Terms

revision of the Plan. These issues related to infill and rounding off and the conversion of buildings in the countryside.⁹²

4.52 With regard to infill and rounding off four options for the replacement Plan have been considered for the replacement Local Development Plan in terms of sustainability appraisal and soundness testing with the option below 7a) being the most deliverable option whilst scoring well in terms of the sustainability appraisal.⁹³ These options were:

- a) Continue with the adopted Local Development Plan policy on infill and rounding off
- b) Infill and Rounding off for market housing with affordable housing contributions (no accessibility requirements)
- c) Infill and rounding off for affordable housing only
- d) Infill and rounding off as set out below in 7a)

4.53 With regard to the conversion of buildings four options were considered:

- a) Conversion to a variety of uses and allowing self catering in the Tenby area
- b) Continue with the adopted Local Development Plan policy on conversion
- c) Prioritise employment and employment related uses and only allowing housing provision where these have been explored.
- d) Allow for a variety of use with affordable housing contributions sought on market housing. No affordable housing in inaccessible locations.
- e) Conversion as set out in 7d) below

4.54 The option included below 7d) scored best in terms of both soundness tests and the sustainability appraisal.

4.55 Review Report (other issues): The need for a specific Local Development Plan policy on farm diversification arises from national planning policy (see paragraph 94 of the Review Report June 2016).

Policy 7 COUNTRYSIDE (TIER 5) (Strategy Policy) ★

Outside the identified Centres is countryside where development must be strictly controlled. The following forms of development will be acceptable in principle:

- a) it constitutes sensitive filling in of small gaps or

⁹² See Review Report June 2016 paragraph 92, 93 and 102. Please also see [Background Paper Alternative Options & Appraisal](#).

⁹³ See Background Paper Alternative Options & Appraisal.

minor extensions (i.e. rounding off) to isolated groups of dwellings⁹⁴ is proposed. Off-site affordable housing contributions will be sought.⁹⁵ Release of land will depend on the character of the surroundings, the pattern of development in the area and the accessibility to the Centres identified in the hierarchy.

- b) a new rural enterprise dwelling is proposed⁹⁶
- c) farm diversification including farm shops is proposed (see New Policy 43A)
- d) it constitutes the conversion of appropriate buildings to a range of uses with market housing being given priority in residential conversions (see Policy 37). Conversion must not result in unacceptable impacts upon the structure, form, character or setting of the building. The conversion of buildings that are obtrusively located in the landscape will not be permitted. Off-site affordable housing contributions will be sought on market dwellings.
- e) Tourist attractions or recreational activity is proposed where the need to locate in the countryside is essential - see Policy 35
- f) A new or extended community facility is proposed - see Policy 48
- g) The proposal constitutes One Planet Development - see Policy 47
- h) New farm buildings are justified for agricultural purposes
- i) Land is released at the edge of a Centre for a small employment site⁹⁷ (See Policy 42) or an extension to

⁹⁴ i.e. where there is a physical cohesion of dwellings. Infill is defined as development for one or two units of a size compatible with its setting in a small gap in an otherwise continuous, built up frontage. 'Rounding off' which would complete or consolidate the built up perimeter will entail the development of no more than one or two dwellings.

⁹⁵ Planning Policy Wales, Edition 9, November 2016, Chapter 9 Housing, paragraph 9.2.22.

⁹⁶ Planning Policy Wales, Edition 9, November 2016, Chapter 9 Housing, paragraphs 9.3.6 to 9.3.10

⁹⁷ Planning Policy Wales, Edition 9, November 2016, paragraph 7.3.2

an established business⁹⁸ in the countryside is required or it is a new business aiming to join existing clusters⁹⁹

- j) There is an exceptional land release adjoining Centres for affordable housing to meet an identified local need – see Policy 45.
- k) There is a need for an exceptional land release to relocate development affected by coastal change - see Policies 34b and 34c.
- l) There is a need for a Gypsy and Traveller site in a countryside location – see Policy 46.

- 4.56 Infill and Rounding Off: Supplementary Planning Guidance on accessibility has been prepared under the 1st Local Development Plan. It is intended that this is carried forward and updated under the replacement Local Development Plan.
- 4.57 Conversion of buildings in the Countryside: Policy 7 sets out the uses that will be considered appropriate in the conversion of buildings in the countryside. This would include agricultural buildings, former churches and dwellings where the residential use is now lost. Technical Advice Note 6: Planning for Sustainable Rural Communities July 2010 and Technical Advice Note 23: Economic Development sections 3 set out detailed national planning development control considerations that need to be taken into account. Paragraph 3.2.2 of Technical Advice Note 23, Economic Development February 2014 provides for the option of prioritising employment-related uses in conversions. 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.
- 4.58 The policy aims to encourage reuse of buildings for employment and employment related activities (such as farm shops, tourism attractions, serviced accommodation and recreational activities. Employment-related uses could include residential conversion as a subordinate part of a scheme). Residential use would include market housing (full-time residential with no occupancy controls) and self-catering. In residential proposals market housing will be given priority over self-catering to assist with the delivery of affordable housing (Policy 37).
- 4.59 National planning guidance refers to buildings needing 'to be of a form, bulk and general design which are in keeping with their surroundings'.¹⁰⁰

⁹⁸ Technical Advice Note 23, February 2014 paragraph 1.1.6 refers principally to traditional employment uses (Class B in the Use Classes order)

⁹⁹ Technical Advice Note 23, February 2014 paragraph 3.1.3

In this National Park these are considered to be those that make a positive contribution to the character of the area through their intrinsic architectural merit or their setting in the landscape. Their interest and charm stems from an appreciation of the functional requirement of the building, their layout and proportions, the type of building materials used (including those constructed of stone, clom and slate), and their display of local building methods and skills.

- 4.60 The form, bulk, design and materials used in some buildings can make them visually intrusive in the landscape. Often those constructed of concrete blocks, asbestos sheeting, corrugated iron etc, clear-span buildings, Dutch barns, open-sided hay sheds fall within this category. The conversion of building(s) that are obtrusively located in the landscape or otherwise not in keeping with their surroundings will not be encouraged. However, it is possible that in exceptional circumstances a modern utilitarian building may make a positive and important contribution to rural employment opportunities without detracting from the appearance of the landscape. Residential or serviced accommodation or holiday accommodation uses would be precluded in proposals for such buildings.
- 4.61 Where planning permission for holiday accommodation is granted this will be subject to conditions and/or a legal agreement to restrict the occupation of the building to holiday use preventing all year round occupancy by the same occupant and use as a second home.
- 4.62 The presence of a species protected under European or United Kingdom legislation is a material consideration in the planning process. Developers considering submitting a planning application must, at the early stages of the process, consider whether there are likely to be any habitats or species present on or near the site that could be affected by the development. Supplementary Planning Guidance will be prepared to assist.
- 4.63 Applications for conversion should contain all details of physical alterations necessary for the determination of the proposal. It may be necessary for the Authority to request a structural survey. For conversion to residential use a structural survey will be a requirement. Where the reuse of a complex of buildings is proposed the National Park Authority will expect an overall scheme for the site to be submitted and agreed by the National Park Authority in advance of applications for individual buildings being considered.
- 4.64 New Farm Buildings: Planning Policy Wales, Edition 9, November 2016 paragraph 7.6.5 advises that local planning authorities should adopt a constructive approach towards agricultural development proposals, especially those which are designed to meet the needs of changing farming practices or are necessary to achieve compliance with new environmental, hygiene or welfare legislation. Supplementary Planning

¹⁰⁰ Technical Advice Note 23: Economic Development 2014, paragraph 3.2.1

Guidance on new farm buildings has been prepared under the 1st Local Development Plan. It is intended that this is carried forward and updated under the replacement Local Development Plan.

Priority A: Special Qualities of the National Park

A. Special Qualities of the National Park

4.65 The special qualities of the National Park are those characteristics and features of the National Park which individually or in combination contribute to making this National Park unique. Work has been undertaken to refresh the Authority's understanding of those special qualities for the Management Plan¹⁰¹. Those highlighted were:

Coastal splendour	Richness of habitats and biodiversity
Diverse geology	Islands
Diversity of landscape	Accessibility
Distinctive settlement character	Space to breathe
Rich historic environment	Remoteness, tranquillity and wildness
Cultural heritage	The diversity of experiences and combination of individual qualities

4.66 The strategy is to ensure that development in the Park conserves and enhances those special qualities.

4.67 Even seemingly minor changes in the landscape can have an adverse effect and therefore attention to detail and the cumulative effects of change are important considerations. To support this strategy a Landscape Character Assessment and a Settlement Study were prepared for the 1st Local Development Plan. The Landscape Character Statement was adopted as supplementary planning guidance to the 1st Local Development Plan. This guidance will be updated and taken forward under the replacement Local Development Plan.

4.68 The Pembrokeshire Coast National Park is widely recognised as Britain's only predominantly coastal national park. The splendour of its coastline, the influence of the seascape, its spectacular scenery, and rugged, unspoilt beauty, provide a scenic quality which was recognised in its designation as a National Park along with the spectacle of the islands off the Pembrokeshire Coast. The geological resource is complex and a significant contributor to the natural beauty of the area. The varied landforms of the National Park are overlaid by millennia of activity by man forming a historic environment which is exceptionally rich and varied. Settlements, including urban areas, retain strong and distinctive character which encompass traditional and more formal architecture, and provide attractive places to visit. Tenby is dominated by Georgian architecture within the walled town, and planned medieval settlements are still evident at Newport and Angle along with their associated field patterns. There is a wealth of

¹⁰¹ Special Qualities of the National Park Background Paper

important habitat and species within the National Park. Habitats and species within the National Park must be considered within the wider context of biodiversity and of conservation effort. The Pembrokeshire Biodiversity Partnership enables organisations to work efficiently towards Wales-, UK- and European-level goals for wildlife, within the framework of the Biodiversity Action Plan for Pembrokeshire. Pembrokeshire has a rich and diverse culture which has been shaped down through the centuries by waves of invaders and settlers. The accessibility of the Park is treasured where there is an ease of getting round and a range of activities freely available. A sense of tranquillity and remoteness is also highly valued amongst visitors to the area. This can include dark skies, free from light pollution.

Policy 8 SPECIAL QUALITIES¹⁰² (Strategy Policy)

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

The priorities will be to ensure that:

- a) The sense of remoteness and tranquillity is not lost and is wherever possible enhanced – see Policy 9.
- 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, and is wherever possible enhanced. The identification of Green Wedges will assist in achieving this priority.
- c) The pattern and diversity of the landscape is protected and wherever possible enhanced – see Policy 14 and Policy 15.
- d) The historic environment is protected and where possible enhanced¹⁰³ – see also Policy 14.

¹⁰² Chapter 13 Planning Policy Wales, Edition 9, November 2016 deals with how pollution issues should be addressed with any planning application. Paragraph 12.4.1 deals with the protection of water quality and the adequacy of supply. See Welsh Office Circular 10/99: Planning requirement in respect of the Use of Non-Mains Sewerage incorporating Septic Tanks in New Development.

- e) Development restores or wherever possible enhances the National Park's ecosystems^{104 105}. The protection of links between sites or the creation of links where sites have become isolated is of particular importance – see Policy 10 and Policy 11.
- f) Development conserves and wherever possible enhances Geological Conservation Review¹⁰⁶ sites or any other important geological resource.
- g) Species and habitats are conserved and wherever possible enhanced for their amenity, landscape and biodiversity value – see Policy 11.
- h) The Welsh language remains an important component in the social, cultural and economic life of many communities in the Park – see Policy 12.
- 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 17, Policy 18, Policy 33 and Policy 35.¹⁰⁷

In assessing the impact upon the special qualities of the National Park, matters of detail and cumulative impact will be given special

¹⁰³ Chapter 6 Planning Policy Wales, Edition 9, November 2016 deals with conserving the Historic Environment. Welsh Office Circulars 60/96 'Planning and the Historic Environment: Archaeology', and 61/96 'Planning and the Historic Environment: Historic Buildings and Conservation Areas' provide guidance.

¹⁰⁴ Includes Natura 2000 sites, Sites of Special Scientific Interest, National Nature Reserves and Marine Nature Reserves.

¹⁰⁵ The Water Framework Directive (WFD) (2000/60/EC) transposed through the Water Environment (Water Framework Directive) (England and Wales) Regulations 2003.

¹⁰⁶ Geological Conservation Review [GCR]: the sites selected provide the basis of statutory geological and geomorphological site conservation in Britain. Regionally Important Geodiversity Sites [RIGS] are advisory designations.

¹⁰⁷ Planning Policy Wales, Edition 9, November 2016, paragraph 5.7.2 refers

consideration.

- 4.69 The policies and advice below provides additional guidance on protecting the National Park's special qualities.

Light Pollution

Policy 9 Light Pollution

Proposals that are likely to result in a significant level of lighting shall include a full lighting scheme and will be permitted:

- a) where the lighting proposed relates to its purpose; and,
- b) where there is no adverse effect on the character of the area, local residents, vehicle users, pedestrians, biodiversity and the visibility of the night sky.

Wherever possible opportunities to mitigate potential cumulative impacts on the night sky should be explored.

- 4.70 Parts of the Pembrokeshire Coast National Park are still relatively undeveloped with minimal impact of lighting on the night sky. This policy is intended to conserve that and also to relate any lighting proposed to its purpose, such as site security or floodlighting recreational facilities, so that careful design and the use of appropriate means of lighting and lighting levels minimise the impact on adjoining areas. There is also a possibility that light pollution could adversely affect the integrity of a Natura 2000 site where development coincides with bat roost sites/transit routes. Opportunities may arise on land nearby in the same ownership to mitigate potential cumulative impacts. Proposals individually or cumulatively can have an unacceptable adverse effect. The Authority intends to produce supplementary planning guidance on lighting.

Biodiversity

- 4.71 The Environment (Wales) Act 2016 places a duty on public authorities to maintain and enhance biodiversity and to promote the resilience of ecosystems in the exercise of their functions. The Well-being of Future Generations (Wales) Act 2015 places a duty on public authorities to set and pursue objectives in the pursuit of the well-being goal to maintain and enhance a biodiverse natural environment with healthy functioning

ecosystems that support social, economic and ecological resilience and the capacity to adapt to change.

- 4.72 Planning Policy Wales, Edition 9, November 2016 sets out clear statements of national development control policy on areas and sites and protected species with statutory nature conservation designation (including Sites of Special Scientific Interest, Special Protection Areas and Special Areas of Conservation).¹⁰⁸ Please refer to Chapter 5 'Conserving and Improving Natural Heritage and the Coast'. Designated sites are identified on the Constraints Map¹⁰⁹ at Deposit Stage. Technical Advice Note 5 Nature Conservation and Planning 2009 provides advice about how the land use planning system could contribute to protecting and enhancing biodiversity and geological conservation and should be read in conjunction with Planning Policy Wales, Edition 9, November 2016. Developments which might have the potential to affect European sites will be subject to Habitats Regulations Assessment and Environmental Impact Assessment at project level.

Policy 10 Local Sites of Nature Conservation or Geological Interest

Development that would be liable to 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 where the effects can be acceptably mitigated through careful design, work scheduling or other measures. Wherever possible opportunities for enhancement should be explored.

- 4.73 Local Sites of nature conservation interest may be formally recognised, such as Local Nature Reserves (shown on the Constraints Map at Deposit Stage), or may not be formally recognised but provide important nature conservation value. The value of a site may include its role as a wildlife corridor or as habitat such as unimproved grassland, coastal habitats and heath and moorland, as well as features such as road verges. It is not possible to identify such sites on the Proposals Map and this policy is intended to ensure that development which would harm the nature conservation value of a site provides appropriate steps to minimise, mitigate, compensate or provide new benefits.
- 4.74 The West Wales Biodiversity Information Centre holds a database of species records and habitat information, which it manages and disseminates to decision makers, conservation organisations and the

¹⁰⁸ See 6. Glossary of Terms.

¹⁰⁹ (see page 9 of the Local Development Plan for more information)

general public on the occurrence and locations of EU and UK priority species and habitats, and those of Welsh and local importance in the region. The Local Records 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 Records Centre to help establish whether there is local nature conservation interest at a development site. Where there is local nature conservation interest which would be significantly harmed by development, the Authority may require further information in the form of ecological surveys and will investigate options to minimise, mitigate, compensate or provide new benefits.

- 4.75 Regionally Important Geodiversity Sites are designated by Geoconservation Cymru – Wales. They are shown in the Plan's Constraint Map (to be added at Deposit stage). Regionally Important Geodiversity Sites Supplementary Planning Guidance was prepared for the 1st Local Development Plan identifying the location of these designated sites and the main features of interest identified in each designation. It is proposed that this guidance will be taken forward and updated to support the policies of the replacement Local Development Plan once that Plan is adopted.

Policy 11 Protection of Biodiversity

Development that would disturb or otherwise harm protected species or their habitats or the integrity of other habitats, sites or features of importance to wildlife and individual species will only be permitted where the effects will be acceptably mitigated through careful design, work scheduling or other measures. Wherever possible opportunities for enhancement should be explored.

- 4.76 This policy aims to ensure that species and their habitats, including for example those identified in the Local Biodiversity Action Plan, are not harmed by proposed development. Please also see policies and guidance in the remainder of this section on Biodiversity.

Welsh Language

- 4.77 The policy will normally apply in Community and Town Council areas with 30% or more Welsh speaking population, as identified in the Census. Where the Community Council average does not reflect the existence of concentrations of Welsh speakers within specific villages in the Community Council or Town Council areas, a more qualified and sensitive measurement will be required.

- 4.78 There are areas within the National Park where the language is an important part of the social fabric and an intrinsic part of everyday life and the Plan strategy recognises and protects the language as one of the Special Qualities in those areas of the National Park where 30% or more of the population speak Welsh (See Policy 8). For the purposes of this policy these areas are known as Welsh language-sensitive areas.
- 4.79 Government advice on Welsh language issues is set out in Technical Advice Note 20 (October 2013) which states that 'the land use planning system should also take account of the needs and interests of the Welsh language and in so doing can contribute to its well-being.

Policy 12 Development in Welsh Language-Sensitive Areas

Unanticipated development proposals within the identified Welsh Language-Sensitive Areas, developments which are considered likely to have a significant effect on the Welsh language will be subject to a Language Impact Assessment, setting out the measures to be taken to protect, promote and enhance the Welsh language.

Mitigation measures can reduce or eliminate potential adverse impacts of development on the Welsh language. However, where development can reasonably be shown, on planning grounds, (for example, the scale of development proposed) to cause harm to the continued role and well-being of the Welsh language within that community, the National Park Authority will resist such development.

- 4.80 Technical Advice Note 20 Welsh Language October 2013 advises that adopted Local Development Plan policies will have already taken the needs and interests of the Welsh language into account, including the implications for windfall sites¹¹⁰ for various types of development that comply with the Plan's policies. Neither these sites, nor sites allocated in the Plan should therefore be subject to a language impact assessment as this is already a requirement of the Plan preparation. Only unanticipated windfall sites which are considered likely to have a significant effect on the Welsh language; which do not comply with the strategy or policies of the Plan and are in those areas identified where the Welsh language is an important part of the social

¹¹⁰ See 6. Glossary of Terms

fabric of the community will be subject to a Language Impact Assessment. The National Park Authority will be responsible for undertaking any assessment and for determining its form.

- 4.81 The language-sensitive areas where this policy will normally apply are Community and Town Council areas with over 30% Welsh speaking population, as identified in the Census. Where the Community Council average does not reflect the existence of concentrations of Welsh speakers within specific villages in the Community Council or Town Council areas, a more qualified and sensitive measurement will be required.
- 4.82 Mitigation measures may need to be applied to any permission either through conditions attached to a planning permission or through section 106 obligations. All section 106 obligations in relation to mitigating the impacts on the Welsh language which are considered necessary to make the development acceptable in planning terms and which are directly related to the development are required to comply with regulations. Potentially appropriate measures include phasing policies that complement the Local Development Plan's overall delivery trajectory, providing adequate affordable housing; sites proposed are for 100% affordable housing for local needs, and the provision of employment opportunities and social infrastructure to sustain local communities.
- 4.83 This policy should not be interpreted as justifying development that would not otherwise be acceptable, solely on the grounds of contribution to safeguarding the Welsh language in the community. Where development can reasonably be shown, on planning grounds, (for example, the scale of development proposed) to cause harm to the continued role and well-being of the Welsh language within that community, the National Park Authority will resist such development.

Historic Environment

- 4.84 Planning Policy Wales, Edition 9, November 2016, sets out clear statements of national development control policy on certain matters which is not repeated here. Please refer to Chapter 6 'the Historic Environment' of Planning Policy Wales, Edition 9 for:
- a) the conservation of archaeological remains;
 - b) the preservation of listed buildings, optimum viable use and their demolition.
 - c) Development in a conservation area including demolition and trees. Fourteen Conservation area assessments and proposals documents have been prepared and adopted ¹¹¹by the National Park Authority between 2002 and 2005. These have been adopted as supplementary planning guidance and will carry significant weight in decisions on planning applications. It is proposed that this guidance will be taken forward and updated

¹¹¹ See 6. Glossary of Terms.

- to support the policies of the replacement Local Development Plan once that Plan is adopted. (shown on the Constraints Map at Deposit Stage)
- d) Protecting historic landscapes, parks or gardens and their setting. (shown on the Constraints Map at Deposit Stage).
 - e) Scheduled Ancient Monuments and archaeological remains (ancient monuments are shown on the Constraints Map at Deposit Stage);
 - f) Enabling development, where substantial heritage benefits can outweigh other objectives of national or local planning policy.

Policy 13 ~~Historic Landscapes Parks and Gardens~~ **DELETED**

- 4.85 Central to delivering the Welsh Government's objectives for the historic environment is the Historic Environment (Wales) Act 2016, which, together with its secondary legislation, new and updated planning policy and advice, seeks to improve the existing systems for the protection and management of the Welsh historic environment. As part of this package, Planning Policy Wales, Edition 9, November 2016 Chapter 6 'Conserving the Historic Environment' has been updated and a new Technical Advice Note 24 'The Historic Environment' and various best practice guidance documents will be produced¹¹².
- 4.86 In assessing the archaeological potential of a proposed development site information from the Historic Environment Record held by Dyfed Archaeological Trust will be taken into account. This record is officially recognised by the National Park Authority. The National Park Authority has prepared Supplementary Planning Guidance relating to the Historic Environment. It is proposed that this guidance will be taken forward and updated to support the policies of the replacement Local Development Plan once that Plan is adopted.

Policy 14 Protection of Buildings of Local Importance

Development affecting buildings which make an important contribution to the character and interest of the local area will be permitted where the distinctive appearance, architectural integrity or their settings are conserved and where possible enhanced.

- 4.87 The National Park is rich in buildings that are not listed but because of their vernacular architecture and construction are fundamental to

¹¹² See Welsh Government Website for current and closed consultations: <http://gov.wales/consultations/?lang=en>

the character and interest of the settlement or are important elements in the landscape.

4.88 The following criteria will be used for selection:

- a) degree to which the building remains in its original integrity;
- b) quality of the individual building's architecture;
- c) position and influence on the townscape or landscape;
- d) association with an important local figure or event.

4.89 When considering development proposals, the Authority will give due regard to the difference in status between buildings of local importance and those that are statutorily listed and, hence, the level of protection which they respectively attract.

Landscape

<p>Policy 15</p>	<p>Conservation and enhancement of the Pembrokeshire Coast National Park</p> <p>Development will not be permitted where this would harm the qualities and special landscape and seascape character of the Pembrokeshire Coast National Park including locally distinctive characteristics by:</p> <ul style="list-style-type: none">a) causing visual intrusion; and/or,b) introducing or intensifying a use which is incompatible with its location; and/orc) failing to harmonise with, or enhance the landform, landscape and seascape character of the National Park; and/ord) losing or failing to incorporate important traditional features. <p>In assessing the impact upon the National Park, matters of detail and cumulative impact will be given special consideration. Landscape Character Areas¹¹³</p>
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¹¹³ The Landscape Character Assessment Supplementary Planning Guidance adopted June 2011 identifies 28 landscape character areas within the National Park.

and Seascape Character Areas¹¹⁴ are shown on the Proposals Map (to be shown at Deposit stage)

- 4.90 The purpose of this policy is to ensure that the qualities of the Pembrokeshire Coast National Park landscape are not lost to future generations. Policy 8 identifies the special qualities of the National Park. Planning Policy Wales, Edition 9, November 2016 paragraph 5.3.6 advises that National Parks must be afforded the highest status of protection from inappropriate developments. In National Parks, development plan policies and development management decisions should give great weight to conserving and enhancing the natural beauty, wildlife and cultural heritage of these areas.
- 4.91 Landscape assessment encapsulates geology, landscape habitats, visual and sensory attributes, historic landscapes, cultural landscapes and public perception – see Landscape Character Assessment Supplementary Planning Guidance adopted June 2011. A landscape character approach allows the recognition and enhancement of specific and valuable attributes across the National Park. This guidance will be updated and taken forward under the replacement Local Development Plan. The assessment identifies areas of common landscape character, their special qualities, discernible landscape trends and management guidance. In many cases the landward boundary of the character area does not correspond with the National Park boundary, meaning that the same landscape character area continues into the administrative area of Pembrokeshire implying that sensitive areas of high value landscape may also lie outside the National Park. The Landscape Character Assessment Supplementary Planning Guidance adopted June 2011 identifies 28 landscape character areas within the National Park.
- 4.92 Seascape character areas are defined in the Authority's Supplementary Planning Guidance 'Seascape Character Assessment' adopted in December 2013. Each area is described in terms of its key characteristics, physical influences, cultural influences and aesthetic, perceptual and experiential qualities. Its cultural benefits and service and key sensitivities are defined and the main forces for change affecting the area discussed. This guidance will also be updated and taken forward under the replacement Local Development Plan. The assessment includes territorial waters up to 12 nautical miles offshore and extends from Cardigan Island in the north to the Taf estuary in Carmarthen bay in the south. The study area reaches inland to include the areas of Milford Haven outside the Park, and up to the tidal limits of the Daugleddau.

¹¹⁴ Seascape character areas are defined in the Authority's Supplementary Planning Guidance 'Seascape Character Assessment' adopted in December 2013. 44 character areas are identified.

- 4.93 Attention to detail and the cumulative effects of change are important considerations. Even seemingly minor changes in the landscape can have an adverse effect; prominent individual buildings or widespread application of inappropriate trends in design detailing can have an impact much wider than their immediate environs and cumulatively will subtly and irreparably alter the often fragile landscape character of the National Park.
- 4.94 Where there is a possibility that development, when either sited onshore or off shore, may cause significant visual intrusion, impacts should be assessed as applicable from:
- a) public access points;
 - b) the Coast Path (a National Trail);
 - c) Public Rights Of Way (as well as the public highway);
 - d) views on entering and leaving settlements;
 - e) views on entering and leaving the National Park itself;
 - f) the offshore islands;
 - g) waterborne craft on the Daugleddau and coastal waters;
 - h) important vantage points within settlements.
- 4.95 Particular attention should be given to medium and distant views, as well as the more obvious impacts on immediate environs and streetscape with special emphasis on the effects on the settings of Listed Buildings, Scheduled Ancient Monuments and Conservation Areas. The effects on the special historical interest of Historic landscapes, parks and gardens also requires careful consideration to safeguard these designations. The appearance of individual and groups of buildings, and settlements in their landscape settings, traditional building details and boundary treatment also need to be considered. Planting using native trees and shrubs, where appropriate, and landscaping can enhance and help to blend new development into its surroundings. This may help to balance in part the loss of original features.
- 4.96 Given the very restricted geographical extent of the National Park and its generally exposed coastal nature, any major or large-scale development is likely to sit uneasily in visual terms with the National Park's landscape and seascape. Development outside the National Park may have an impact on the qualities of the National Park and the National Park Authority will use the same principles as set out in Policy 15 when commenting on proposals outside of the National Park. Please also see 'Major Development', 'Nationally Significant Infrastructure Projects' and 'Developments of National Significance in Wales' in the next chapter.
- 4.97 Where a development would constitute the introduction or intensification of a use which is incompatible with the location, for example noisy activities in a relatively undisturbed location, such development would not be considered appropriate by the National Park Authority.

Open Space & Green Wedges

- 4.98 Planning Policy Wales, Edition 9, November 2016 sets out clear statements of national development control policy on formal and informal open space, playing fields and green wedges. Please refer to Chapter 11 'Tourism, Sport and Recreation' and Chapter 4 'Planning for Sustainability'.
- 4.99 Areas of existing Open space and Green Wedges are shown on the Proposals Map (to be shown at Deposit stage) and will be protected from development in line with national planning policy. The Authority's Open Space Assessment was updated in 2016 and identifies the amount of recreational open space available in Centres and communities throughout the National Park. Based on the Fields in Trust standards of provision it also identifies where there are shortfalls of specific types of recreational space. The assessment of recreational open space will be used to identify where planning obligations will be required to provide for future needs as a consequence of additional development in communities. Planning obligations cannot be used to make up existing shortfalls of provision. Where these exist the Authority will consider planning applications to provide additional facilities in appropriate locations.
- 4.100 Options Considered and Preferred Approach: Two options were considered in relation to Green Wedges, to continue with the Green Wedges shown in the Adopted Local Development Plan or to review for the replacement Plan. The second option was the preferred option.

Policy 16 Open Space and Green Wedges



Existing Open Space and Green Wedges are shown on the Proposals Map (to be shown at Deposit Stage).

- 4.101 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.
- 4.102 Planning Policy Wales, Edition 9, November 2016 paragraph 4.8.14 advises that when considering applications for planning permission in green wedges, a presumption against inappropriate development will apply. Local planning authorities should attach substantial weight to any harmful impact which a development would have on a green wedge.

Coast

- 4.103 Planning Policy Wales, Edition 9, November 2016 sets out clear statements of national development control policy on the coast and coastal defence work. Please refer to Chapter 5 'Conserving and Improving Natural Heritage and the Coast'. Locations in coastal areas considered suitable for development are shown on the Proposals Map (to be shown at Deposit stage).

Policy 17 Shore Based Facilities

Development of shore based facilities including those linked to proposals below mean low water, will be permitted within the developed areas of the coast where compatible with adjacent uses.

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

- 4.104 This policy aims to protect the undeveloped, quiet stretches of coastline by directing development to those areas more suited in terms of maritime requirements, on-shore access, parking and other associated facilities.
- 4.105 There are a multitude of structures and buildings associated with the shore or harbour or mooring provision, either extending out into the water, such as jetties and slipways or associated with equipment beyond the mean low water mark. It is also possible within the Plan period that larger developments such as mineral exploration could operate off the Pembrokeshire coast, with implications for on-shore structures.
- 4.106 Policy 33 on Renewable Energy deals specifically with onshore connections to offshore renewable energy generators. It is accepted that technically feasible locations for such connections may need to be located on the undeveloped coastline. Other possible exceptions are the construction of lifeboat stations, landing stages/pontoons/slipways etc., work related to sewage treatment and sea defences.
- 4.107 Proposals will often share the waters with other users so it is important that no conflict or congestion will result from any development. Some uses along the coast are often seasonal in nature e.g. deck chair hire and ice cream sales. In such instances Policies 8 and 15 will be the primary policies used for the consideration of such proposals.

4.108 The Welsh Coastal Tourism Strategy published in December 2008 by the Welsh Assembly Government recommends expansion of the marina capacity outside this National Park. The National Park coast is for the greater part undeveloped and highly sensitive in landscape terms and often for nature conservation reasons too. Furthermore, although there are numerous small harbours around the coast, due to their tidal characteristics, access by boat is not possible for significant periods of the day. The works required to provide the sort of access and supporting developments which a successful marina would need would be substantial thereby increasing further the urbanisation of the location. See also Policy 18.

Policy 18 Porthgain, Saundersfoot, Solva and Tenby Harbours

Development within the identified harbour areas as shown on the Proposals Map (to be shown at Deposit Stage), will be permitted provided that:

- a) it sustains harbour activities; and
- b) it conserves or enhances the existing character of the harbour.

4.109 The aim of this policy is to ensure that the harbours at Tenby, Saundersfoot, Solva and Porthgain are viable in the long term. This includes the potential for the harbours to evolve to ensure that their long-term future is maintained. These harbours are identified on the Proposals Map (to be shown at Deposit Stage).

4.110 When proposals are submitted in these harbour areas the Authority will request evidence with the application which will set out the relationship between the operation of the harbour business and the proposal and how the proposal will contribute positively to ensuring the long term viability of the harbour. This is what is meant by criterion a) of the policy. All development in harbours will require a flood consequence assessment.

4.111 Each of the harbours contributes to their locality. Proposals for development within the harbours will need to consider the needs of existing businesses and activities and ensure that new uses complement existing harbour uses. Tenby harbour provides the principal access to Caldey Island. Development proposals located in the harbour will need to ensure that access for the residents and businesses of Caldey Island is maintained. The Saundersfoot Regeneration Strategy is being developed (December 2016) as a community “place based” regeneration strategy plan for the waterfront.

Priority B: Major development, the potential for growth

B. Major Development, the Potential for Growth

Major Development

- 4.112 Statutory designation does not necessarily prohibit development, but proposals for development must be carefully assessed for their effect on those natural heritage interests which the designation is intended to protect. In National Parks, special considerations apply to major development proposals which are more national¹¹⁵ than local in character.
- 4.113 Planning Policy Wales, Edition 9, November 2016 Welsh Government, paragraph 5.5.6 sets out the actual test. Planning Policy Wales Edition 9 also sets out the tests for minerals proposals in National Parks (paragraph 14.3.2)

Nationally Significant Infrastructure Projects

- 4.114 The Planning Act 2008 defines what a Nationally Significant Infrastructure project is. The 2008 Act process, as amended by the Localism Act 2011, involves an examination of major proposals relating to energy, transport, water waste and waste water. Under the 2008 Act an application is made for a Development Consent Order (DCO) to the Planning Inspectorate. The Authority's role in the Examination is that of a statutory consultee and it is under a duty to submit a 'Local Impact Report' to the Examining Authority.
- 4.115 For Development Plan purposes the Examining Authority will expect the local planning authority to provide a comprehensive early assessment of all the main impacts. The Local Impact Report should set out the various development plans (including the status and relevant policies of each) and then give a clear assessment of impacts under different areas with a conclusion on each. It should also explain how the Development Consent Order or associated documents could be improved.
- 4.116 National Policy Statements (NPSs) are produced by the UK Government and decisions on Nationally Significant Infrastructure Projects are taken within the context of these statements.

Developments of National Significance in Wales

- 4.117 The statutory basis for the Development of National Significance ("DNS") process is provided in Part 5 of the Planning (Wales) Act 2015, which amends the Town and County Planning Act 1990 ("the Act"), and the Developments of National Significance (Procedure) (Wales) Order 2016 and subsequent Regulations.

¹¹⁵ 'National' in this context means UK.

4.118 A full list of the types of developments covered by this can be found in The Developments of National Significance (Wales) Regulations 2016.

4.119 A Local Impact Report is also required for these types of proposals.

Ministry of Defence



4.120 Options Considered and Preferred Approach: Two options were considered for Ministry of Defence proposals and the option below contributed more to the sustainability objectives.¹¹⁶

4.121 The Ministry of Defence has advised that there are no plans for development of any significance in the Pembrokeshire estate in the foreseeable future (June 2016). Limited operational development on the ranges subject to mitigation measures can be permitted under normal planning policy and proposals for significant intensification or alteration of use or extensions to sites will have to be subject to the most rigorous examination and only permitted in exceptional circumstances under the 'Major Development Test'.

Hazardous Installations

4.122 No allocations for hazardous substances development or potentially polluting activities are proposed. The major development test will provide the primary policy context for the consideration of proposals for hazardous substances development.

Policy 19 Hazardous Installations

Development within safeguarding zones around hazardous installations will be permitted where there is no unacceptable risk to either:

- a) public health or safety; or
- b) the operation of the hazardous installations; and
- c) access to the hazardous installations.

4.123 This policy aims to ensure that public health or safety is not put at risk by development in proximity to sites using or storing hazardous substances. The Health and Safety Executive and Natural Resources Wales will be consulted on all planning applications within the safeguarding zone.

¹¹⁶ See [Background Paper Alternative Options & Appraisal](#)

4.124 Their response will be used to assess whether or not there is a risk to public health or safety, the operation of the hazardous installation or access to it. The hazardous installations safeguarding zones established by the relevant safeguarding authority are shown on the Constraints Map (to be added at Deposit Stage).

Scale of Growth

4.125 The Pembrokeshire Coast National Park has increasingly been unable to accommodate demand due to landscape capacity¹¹⁷ issues. Government policy asks the Authority to consider evidence such as population projections and capacity issues in determining the overall scale of growth.

4.126 Recent Development Plan Inquiries have endorsed the current approach of allowing development commensurate with the landscape capacity¹¹⁸ of the National Park. Visitors and residents appreciate it when the Park retains its small and vibrant communities.

4.127 The approach overall ensures compliance with the Environment Act 1995 which requires compatibility with the national park designation (See Policy 1 also).

4.128 Looking at development types in turn in terms of those most likely to impact strategically in terms of growth the approach does fit:

- a) Strategically in the Wales Spatial Plan larger growth areas (hubs) are designated outside the National Park. In terms of housing growth is not anticipated as a result of a declining population forecast. Focus is on enabling affordable housing delivery for the local population. Market housing is needed to cross subsidise delivery. Policy 44 and Policy 45 advises.
- b) Employment provision is small scale (less than 2 hectares) as more strategic hubs are identified outside the National Park area consistent with the Wales Spatial Plan and the approach set out in neighbouring Local Development Plans.
- c) The landscape sensitivity and capacity study for renewable energy has resulted in potential primarily for small scale developments. Some medium scale proposals may be possible also. There are extremely limited opportunities large scale proposals. Policy 33 advises.
- d) The Authority's landscape sensitivity and capacity study for camping and caravanning advises that there is a need to conserve existing unspoilt landscapes and seascapes and enhance existing caravan

¹¹⁷ See 6. Glossary of Terms.

¹¹⁸ See 6. Glossary of Terms.

and camping sites, with very limited opportunities for expansion or new sites – see Policy 38A.

- e) National Planning policy advises that minerals development should not take place in National Parks save in exceptional circumstances (paragraph 14.3.2).
- f) National planning policy for **waste** acknowledges that facilities should predominantly serve the National Park area. – See Waste Background Paper.
- g) For coastal development national policy recommends the expansion of marina capacity outside the National Park (see the Welsh Coastal Tourism Strategy published in December 2008).
- h) For retail the strategy for Tenby, Saundersfoot, St Davids and Newport is to maintain their position relative to one another and larger centres outside the area. Despite leaking spend to centres outside the Park area they are performing well with the support of resident and visitor spend. It is proposed to encourage the sympathetic regeneration of these Centres so that they can continue to remain attractive places to live and visit; provide a valuable role in meeting the needs of local communities and visitors, and attract niche retail opportunities. The Regional Retail Study for South West Wales supports this approach with no need to allocate further retail opportunities. National policy and local criteria based policies to address proposals if received.

Policy 20 SCALE OF GROWTH (Strategy Policy)

Where compatible with the National Park designation:

- a) The development of shore based facilities within the developed areas of the coast will be permitted. Marina development is not considered appropriate on this sensitive coast (see Policy 17).
- b) Provide for and or permit small scale employment proposals (see Policy 42.¹¹⁹
- c) Provide for and or permit housing, to facilitate the delivery of affordable housing needs. In addition priority will be given to

¹¹⁹ Less than 2 hectares.

the delivery of affordable housing needs over other uses in certain circumstances¹²⁰ (see Policy 7, Policy 37, Policy 43, Policy 44, Policy 44A, Policy 45

- d) Permit waste facilities which predominantly serve the National Park (see Policy 27)
- e) Consider small scale renewable energy schemes favourable, with medium scale schemes offering some potential. Large scale opportunities are extremely limited (see Policy 33)
- f) Allow limited expansion of existing caravan and camping sites or the limited development of new sites (Policy 38A)
- g) For retail it is proposed to encourage the sympathetic regeneration of Tenby, Saundersfoot, St Davids and Newport so that they can continue to remain attractive places to live and visit; provide a valuable role in meeting the needs of local communities and visitors, and attract niche retail opportunities.

Major development, including minerals development, will only be permitted in exceptional circumstances.^{121, 122}

Minerals

4.129 This National Park currently contributes to aggregate mineral extraction in relation to sand and gravel quarries and hard rock. National policy states that minerals development (which includes oil and gas) should not take place in National Parks, save in exceptional circumstances¹²³. Exceptional circumstances can include over-riding

¹²⁰ See Introduction to Priority E Affordable Housing and Housing Provision

¹²¹ Planning Policy Wales, Edition 9, November 2016, paragraph 5.5.6

¹²² Planning Policy Wales Edition 9, November 2016, paragraph 14.3.2

¹²³ Planning Policy Wales Edition 9, November 2016, paragraph 14.3.2

national interest, or when significant overall benefits to the National Park can be demonstrated.

- 4.130 To justify new sites or extensions to existing sites within the National Park, it must be demonstrated that alternative resources, that would be environmentally acceptable for extraction are not available; the scope of meeting the need in some other way has been assessed and rejected; and that the detrimental effects of the proposal can be mitigated or compensated for.¹²⁴
- 4.131 Discussions continue to take place with neighbouring authorities (Pembrokeshire, Carmarthenshire, Ceredigion) about the possibility of output currently met from reserves within the National Park being sourced from outside. This approach is supported by the Regional Technical Statement for the North Wales and South Wales Regional Aggregate Working Parties 1st Review, August 2014.¹²⁵ Safeguarding mineral resources within Local Development Plans will provide information about the location of resources outside the National Park and will assist this process.
- 4.132 There are no marine wharves within the National Park which bring marine aggregates into the area. Should acceptable proposals for wharves come forward at a future date, such wharfs will be protected to safeguard sand and gravel routes into the area.
- 4.133 Planning Policy Wales, Edition 9, November 2016 sets out clear statements of national development management policy on minerals in National Parks¹²⁶. Safeguarding Zones and Buffer Zones¹²⁷ are identified on the Proposals Map (to be shown at Deposit Stage). The South Wales Coalfield extends west into Pembrokeshire becoming the Daugleddau 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 east¹²⁸.

¹²⁴ Minerals TAN1: Aggregates Welsh Assembly Government, March 2004, paragraph 52.

¹²⁵ Regional Technical Statement for the North Wales and South Wales Regional Aggregate Working Parties 1st Review, August 2014.

¹²⁶ Planning Policy Wales, Edition 9, November 2016, Chapter 14 Minerals

¹²⁷ Minerals Planning Policy (Wales), Minerals Technical Advice Note (Wales) 1: Aggregates March 2004, paragraph 70 to 71.

¹²⁸ Mineral Technical Advice Note 2: Coal, January 2009 confirms that National Designations of environmental or cultural importance (including National Parks) should be excluded from coal resource zones and mineral safeguarding zones.

Policy 21 Minerals Safeguarding

Reserves of sand and gravel, limestone, sandstone, igneous rock and slate will be safeguarded as shown on the proposals map (to be shown at Deposit Stage).

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.

4.134 Minerals safeguarding is undertaken to ensure that mineral resources which may be required by future generations are not unnecessarily sterilised by permanent development. The Authority will take account of the presence of mineral resources in considering planning applications which would otherwise sterilise these resources. The identification of safeguarding areas on the proposals map (to be shown at Deposit Stage) for sand and gravel and hard rock (limestone, sandstone, igneous rock and slate collectively) does not identify areas where mineral working can take place, and gives no indication of the suitability of working or commercial quality of material. Any proposals for working would be subject to national and regional guidance and relevant planning policy and will need to provide sufficient details of the proposed site restoration including materials. Consideration of environmental impacts will include designated sites, such as Natura 2000¹²⁹ sites and undesignated sites. The Authority has prepared supplementary planning guidance on safeguarding minerals zones. It is proposed that this guidance will be taken forward and updated to support the policies of the replacement Local Development Plan once that Plan is adopted.

¹²⁹ See [6. Glossary of Terms](#)

Policy 22 Buffer Zones

Buffer Zones around active and inactive mineral extraction sites are shown on the proposals map (to be shown at Deposit Stage).

4.135 Buffer zones are defined in accordance with Planning Policy Wales, Edition 9, November 2016 (paragraph 14.4.1), 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 policy and guidance. Consideration of planning proposals within Buffer Zones will be in line with national policy and guidance.

Policy 23 Borrow Pits

Temporary planning permission will be granted for borrow pits where:

- a) the borrow pit is required to supply a specific short-term construction project with appropriate material; and
- b) extraction will cease upon completion of the construction scheme; and
- c) is closely located in relation to the proposed construction project; and
- d) there are clear environmental benefits from meeting need from the proposed source rather than from an existing site or sites with planning permission or from secondary or recycled aggregates either within or outside of the National Park; and
- e) the scale of the development is appropriate for the locality; and
- f) the development will not irretrievably damage the local landscape and local environment; and
- g) the development will not harm the amenities of the local area and local communities in particular with regard to access, traffic generated, noise, vibration, dust and safety nor

adversely affect existing surface and groundwater resources; and

- h) any material transported by public highway can be accommodated within the local road network; and
- i) there is provision for a beneficial after-use, restoration, landscaping and post closure management of the site, including where possible details of progressive restoration of the site.^{130 131}

4.136 It can be in the interests of a local area for a construction project to be supplied with materials from a locally derived source, avoiding the traffic generation and road movements with all the inherent problems associated with a remoter option. The term 'borrow pit' applies to a mineral working required to supply material for use solely for a specific short-term construction project.

4.137 The built environment is an important feature in the National Park and contributes to its special qualities. The term local, in this context means the National Park and immediately adjacent areas. Consideration of environmental impacts will include designated sites, such as Natura 2000 sites and undesignated sites.

Policy 24 Local Building Stone

Planning permission will be granted for quarrying of local building stone where:

- a) the material is required to supply a specific proven local need and exceptional circumstances can be demonstrated; and
- b) it is closely located in relation to the proposed construction or development site; and
- c) there are clear environmental benefits from meeting supply from the proposed source rather

¹³⁰ See Minerals Technical Advice Note 1: Aggregates, paragraph 130 -139, and Minerals Technical Advice Note 2: Coal, Appendix Q8 (page 126).

¹³¹ See Planning Policy Wales, Edition 9, November 2016, paragraph 14.5.4.

than from an existing site or sites with planning permission or from secondary or recycled aggregates either within or outside of the National Park; and

- d) the scale of the development is appropriate for the locality and to serve the local market; and
- e) the development will not have an unacceptably adverse impact or damage the local landscape and local environment; and
- f) the development will not harm the amenities of the local area and local communities in particular with regard to access, traffic generated, noise, vibration, dust and safety nor adversely affect existing surface and groundwater resources; and
- g) the local road network has the capacity to accommodate the traffic arising from the development; and
- h) there is provision for a beneficial after-use, restoration, landscaping and post closure management of the site, including where possible details of progressive restoration of the site.¹³²

4.138 Planning Policy Wales, Edition 9, November 2016 states that mineral working in National Parks should only take place in exceptional circumstances¹³³. In some cases this may relate to the need for small scale mineral extraction from local workings for building stone, which are not otherwise available and which can be extracted without unacceptable adverse impacts. The use of locally derived building materials is supported so as to encourage the promotion of design quality which respects vernacular traditions. Consideration of environmental impacts will include designated sites, such as Natura 2000 sites and undesignated sites.

Policy 25 Recycled, Secondary and Waste Materials

The use of recycled, secondary and waste materials, including demolition and construction waste arising

¹³² See Minerals Technical Advice Note 1, paragraph 130 to 139.

¹³³ Planning Policy Wales, Edition 9, November 2016, paragraph

14.3.2

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.

4.139 The principle of recycling mineral materials from sites and their use as secondary aggregates is supported because this contributes to the sustainable use of mineral materials which are a finite resource. In cases where proposals involve the reworking of mineral waste which has been assimilated into and enhances the landscape or forms an area of archaeological interest, they will not be permitted.

4.140 Where processing needs to deal with waste arising from several sources a base location may be set up to deal with recyclable mineral wastes. Recycling plants may also be appropriate on working sites with planning permission for minerals extraction or mineral waste disposal. Crushing and screening operations can result in harm to the amenities of the surrounding area and these must be addressed and appropriate mitigation measures put in place.

4.141 It is recognised that there are 'permitted development' rights under the General Development Order 1995 in relation to minerals and in recognition of the potential environmental impact of such development the Authority will seek informal consultation arrangements with developers and operators over schemes falling outside formal planning approval procedures. Consultation will also take place with Natural Resources Wales. There are also environmental permits separate to the planning system that need to be considered.

Policy 26 Inactive Mineral Sites

Where the Authority is satisfied that the winning and working of minerals or the depositing of mineral waste has ceased permanently it will investigate the appropriateness of serving a Prohibition Order on the owner(s).

4.142 There is a single site within the National Park which has planning permission but which is unlikely to be re-opened. The Authority has submitted a Prohibition Order at Penberry for confirmation. This site is shown on the Proposals Map (to be shown at Deposit Stage). The Authority will continue to investigate the appropriateness of making Prohibition Orders to provide certainty about future workings at any other appropriate sites. In considering what action to take the Authority will take into account likely benefits for the restoration of sites and appropriate after uses. Other inactive sites will be kept under review to ensure high standards of environmental protection appropriate to the National Park are maintained. The Authority has prepared Supplementary Planning Guidance on land instability arising from former coal mining working for the 1st Local Development Plan. It is proposed that this guidance will be taken forward and updated to support the policies of the replacement Local Development Plan once that Plan is adopted. Further information about land instability from natural processes and from other non-coal mining operations can be obtained from the British Geological Survey.¹³⁴ See paragraphs 13.9.1 to 13.9.2 of Planning Policy Wales, Edition 9, November 2016 which provides a national development control policy on unstable land.

Waste

4.143 Planning Policy Wales, Edition 9, November 2016, Technical Advice Note 21: Waste, Local Development Plans, Towards Zero Waste, and the Sector Plans, taken as a whole, comprise the overall waste management plan for Wales as required under European Union law, particularly Articles 1,4,13, 16, and 28 of the Waste Framework Directive¹³⁵. The Collections, Infrastructure and Markets Sector Plan and Technical Advice Note 21: Waste refers to the Areas of Search Maps for both in building and open air facilities to provide strategic locational criteria for sub regional waste management facilities¹³⁶¹³⁷.

¹³⁴ See the British Geological Survey website

¹³⁵ Technical Advice Note 21 Waste February 2014, paragraph 1.4

¹³⁶ Collections Infrastructure and Markets Sector Plan, July 2012, Section 3 (q) ;*Criteria for locating waste facilities*' and Technical Advice Note 21 Waste, February 2014, paragraph 3.26

These maps exclude the National Park as an appropriate location for providing such facilities¹³⁸. National guidance states that local planning authorities should seek to provide suitable and appropriate waste management facilities within their areas¹³⁹. For the National Park, local scale facilities that would predominantly serve the National Park area are considered appropriate and suitable in this respect¹⁴⁰. Local facilities can include Community Recycling Centres (e.g. Bring Sites), Clean Materials Recovery Facilities, Transfer Stations, Civic Amenity, and Construction & Demolition Exemption¹⁴¹. Specific requirements for these or any other facilities have not been identified however. In addition to national policy and guidance future proposals will be considered against the relevant local criteria based policies. Regional Waste Planning Monitoring Reports for the South West Wales region will also be used to inform local planning decisions.

Policy 27 Local Waste Management Facilities¹⁴²

Local waste management and recycling facilities which predominantly serve the National Park area will be permitted provided:

- a) the site would be conveniently located in relation to the needs of the National Park community; and
- b) the proposal makes provision for adequate screening so as to minimise any adverse effects; and
- c) the development is sufficiently distanced from neighbouring properties so as not to constitute a potential health or safety hazard; and
- d) the development will not cause demonstrable harm to the amenities of the local area and local

¹³⁷ Sub regional facilities are those which provide for more than one local authority area but not the whole region. The South West Wales region comprises Bridgend, Carmarthenshire, Ceredigion, Neath Port Talbot, Pembrokeshire and Swansea authorities.

¹³⁸ South West Wales Regional Waste Plan 1st Review, August 2008, Appendix J

¹³⁹ Technical Advice Note 21 Waste, February 2014, paragraphs 3.21-3.22

¹⁴⁰ See Waste Background Paper

¹⁴¹ Construction and Demolition Exemption refers to sites which are registered as exempt from the Environmental Permitting Regulations and do not need to hold a licence.

¹⁴² See 6. Glossary of Terms

communities in particular with regard to access, traffic generated, noise, vibration, dust, litter, odour nor adversely affect existing surface and groundwater resources.

4.144 Civic amenity sites serve a useful purpose in that household waste can be sorted to facilitate re-use and recycling. It also helps to avoid fly tipping. They may generate significant vehicle movements and will involve temporary storage of waste materials in open topped or closed (for putrescible waste) containers. For these reasons, the requirements with respect to access, parking and amenity are quite stringent. There are also environmental permits separate to the planning system that need to be considered.

Policy 28 Composting

Proposals that involve the composting of organic material, generated predominantly within the National Park will be permitted unless there would be an unacceptable impact on any of the following:

- a) the amenities of the local area and local communities in particular with regard to access, traffic generated, noise, vibration, dust, odour, safety nor adversely affect all existing surface and groundwater resources; and
- b) the capacity of the local road network.

And provided:

- c) there is provision for landscaping and/or screening of the site; and
- d) there are adequate steps to deal with leachate; and
- e) the product has added value.

4.145 Composting is a sustainable process/treatment for the large amount of green waste produced in the National Park. However the product must be of a quality good enough for beneficial afteruse.

4.146 The management of green waste may also include associated developments such as shredding. The collection and management of green waste is undertaken at the Civic Amenity sites and two landfill

sites within the County. Composting also takes place at farms within the County; also there are community compost schemes.

4.147 The National Park Authority will support proposals for composting material predominantly generated within the National Park at or adjoining existing sites being used for waste management or disposal, which are operating with no associated environmental or other problems. Natural Resources Wales will be consulted. There are also environmental permits separate to the planning system that need to be considered.

4.148 It is likely that applications for windrow composting will be most suitable in rural locations.

Priority C: Climate change, sustainable design, flooding, sustainable energy

C. Climate Change, Sustainable Design, Renewable Energy, Flooding

- 4.149 The strategy of the Local Development Plan is to support sustainable locations for development by locating housing and other development adjacent to services. The strategy of this Local Development Plan is also to seek to minimise the contribution that certain developments¹⁴³ will make to greenhouse gas emissions by constraining polluting or hazardous development in the Park (see paragraph 4.122), by promoting the use of renewable energy and by encouraging sustainable design in development. The strategy is also to accept the need to adapt to climate change and to deal with the consequences of climate change in a more forward thinking way, not for just the immediate Local Development Plan period.
- 4.150 At the end of the Local Development Plan period new development will be more sustainable in design. The Park will have a series of community based renewable energy projects as well as individual proposals in operation. In planning for the future changes in climate no new development has been encouraged in locations where there is a long term strategy to allow the sea or river to inundate or flood. Development will have been directed away from areas that are or will be prone to flooding and inundation within the next 100 years using information supplied by Natural Resources Wales and the Shoreline Management Plans for West Wales and South Wales. As the climate changes there will be a need to understand and manage risks and consequences caused by flooding, including the implications for increased flood risk elsewhere caused by any particular development. New development will have been directed away from high risk locations allowing the undeveloped coastline to evolve naturally. Developed areas of the coast at risk from flooding and inundation caused by climate change will be assisted to manage the necessary changes to help communities minimise risk to life and assets and to adapt over time.
- 4.151 The strategy for development chosen along with the proposals under 'Sustainable Transport.' should also contribute to this agenda.
- 4.152 Options Considered and Preferred Approach: 5 options were considered for achieving sustainable design gains. Although some options scored best in the Sustainability Appraisal they were not deliverable and Option 4, leaving Building Regulations to deal with energy and other resource standards, intervening only in the case of stricter energy targets for larger scale schemes was chosen.¹⁴⁴

¹⁴³ The main contributing sectors for CO₂ in the National Park are oil refinery and power station emissions, domestic and commercial combustion, road transport and other transport.

¹⁴⁴ See [Alternative Options & Appraisal Background Paper](#).

4.153 Review Report: Paragraph 57 of the Review Report refers to the need to revise that element of the policy which required energy efficiency improvements being sought in the original building as well as a proposed extension as it has not proved workable. This change is reflected below.

Sustainable Design

Policy 29 SUSTAINABLE DESIGN (Strategy Policy)

All proposals for development will be expected to demonstrate an integrated approach to design and construction, and will be required to be well designed in terms of:

- a) Place and local distinctiveness¹⁴⁵ (see Policy 8)
- b) Environment and biodiversity¹⁴⁶(see Policy 8)
- c) Community cohesion and health¹⁴⁷(see Policy 30)
- d) Accessibility (see Policy 52)
- e) Energy use¹⁴⁸
- f) Energy generation¹⁴⁹ (see Policy 33)
- g) Materials and resources (see Policy 31)
- h) Water and drainage (see Policy 32)
- i) Waste¹⁵⁰ (see Policy 31)

¹⁴⁵ Includes landscape and townscape.

¹⁴⁶ Embraces historic landscape, geodiversity and biodiversity

¹⁴⁷ Includes also “Secured by Design”, adaptability to changing circumstances, and neighbour amenity considerations.

¹⁴⁸ Applicants will be expected to demonstrate a design approach which minimises energy use.

¹⁴⁹ Applicants will be expected to incorporate appropriate renewable or low carbon energy technologies including solar water systems, solar photovoltaic, wind, heat pumps and biomass where appropriate.

¹⁵⁰ Includes waste minimisation and promotion/facilitation of recycling, in both the construction and operational phases.

j) Resilience to climate change¹⁵¹

- 4.154 Sustainable Design Guidance to help applicants to comply with the policy and explain what the Authority requires to accompany planning applications was prepared under the 1st Local Development Plan. It is proposed that this guidance will be taken forward to support the policies of the replacement Local Development Plan once that Plan is adopted.¹⁵² The integrated approach to design set out in the policy and guidance will encompass both design and construction phases of development.
- 4.155 The level of carbon reduction expected will be determined by the minimum required by Building Regulations (Part L). The National Park Authority, working within the context of Welsh Government policy guidance will expect all applicants to address carbon reduction within the designs for their schemes¹⁵³.
- 4.156 The aim of this policy is to make more efficient use of water, for example, through rainwater harvesting, or employing a sustainable drainage system. There will however, still be a need for some drainage. To be well designed the development will still require adequate sewage disposal facilities and surface water draining. Capacity must be made available before the development can be occupied.
- 4.157 In respect of criterion h) early consultation with Natural Resources 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 of 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.
- 4.158 The policies below provide additional advice and guidance on addressing sustainable design issues.

¹⁵¹ Includes robustness to flooding, coastal risk and other pressures arising for climate change.

¹⁵² Pembrokeshire Coast National Park - SPG

¹⁵³ See Technical Advice Note 12 Design (March 2016) paragraphs 5.4.1-5.4.9

Policy 30 Amenity

Development will not be permitted where it has 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 or light which has a significant adverse impact; and/or
- d) the development is visually intrusive.

4.159 This policy aims to protect the amenity enjoyed by people in their residences, workspaces and recreational areas. Amenity is defined as those elements in the appearance and layout of town and countryside which makes for pleasant life rather than a mere existence. Anything ugly, dirty, noisy, crowded, intrusive or uncomfortable is likely to adversely affect amenity.

Policy 31 Minimising Waste

Development must minimise, re-use and recycle waste generated during demolition and construction and provide waste management facilities of an appropriate type and scale as an integral part of the development.

4.160 Demolition, construction and excavation wastes are a valuable resource of material that can be recycled, although minimisation of waste should be the first consideration. This Authority would welcome the provision of Site Waste Management Plans to help this process. Avoidance of this material going to landfill would comply with the Landfill Directive. There are a number of existing recycling facilities within the County. Local recycling facilities for this material are supported in accordance with the Government's sustainable principles for waste management and for mineral planning. Recycling, composting and other waste minimisation measures help the environment by reducing the amount of land required for waste disposal by landfill or landraising and for the treatment of residual waste, which is left over following maximum recycling and composting.

- 4.161 The Authority will expect proposals likely to generate significant amounts of waste to include facilities for "green waste" composting and for the collection of waste suitable for recycling, and for residual waste.
- 4.162 There are different types of recycling provision for different types of wastes. The very local provision for household and non-domestic wastes would be neighbourhood collection, which could either be from the doorstep, kerbside or from a central collection point. All waste generating developments should provide for the separate storage of types of waste including recycled, residual waste and food waste.

Policy 32 Surface Water Drainage

Development will be required to incorporate sustainable drainage systems for the disposal of surface water on site.

- 4.163 The disposal of surface water run-off from development both during construction and after completion requires careful consideration in order to minimise its adverse environmental impacts¹⁵⁴. Traditional practices for disposing of surface water involve channelling the water away to the nearest watercourse to promote rapid run-off. This approach can lead to an increased risk of flooding downstream, reduced groundwater recharge (a reduction in the water percolating through the soil back to ground water) and the transmission of pollutants to watercourses. Sustainable drainage systems are promoted by Natural Resources Wales and supported by Dwr Cymru. They move away from traditional piped drainage systems to engineering solutions that mimic natural processes and include hard options such as permeable and porous surfaces and/or softer options such as vegetated landscape features, ponds, wetlands and grass swales.
- 4.164 Sustainable urban drainage systems fall into 3 broad groups which aim to:
- reduce the quantity of runoff from the site (source control);
 - slow the velocity of runoff to allow settlement filtering and infiltration (permeable conveyance systems); and
 - provide passive treatment to collected surface water before discharge into groundwater or to a watercourse (end of pipe systems).

¹⁵⁴ Pembrokeshire County Council is the lead local flood authority for advising on surface water disposal for all new development and issuing Flood Defence Consent for works on non-main rivers.

- 4.165 Planning applications must be accompanied by an assessment of the suitability of sustainable urban drainage systems.
- 4.166 Source control should be an integral part of the design of most new development and developers should seek to incorporate source control sustainable drainage systems within the application site for surface water disposal into development proposals at the time of application. This applies to all surface water within the site - from roofs, roads and other surfaces and planning conditions will be used to ensure compliance.
- 4.167 It is recognised that there may be exceptional circumstances where source control would not be wholly achievable and where this has been demonstrated not to be practicable, developers should in the first instance, provide sustainable drainage systems for as much of the development as is practically possible. For the remainder of the development an acceptable alternative means of surface water disposal must be incorporated. Traditional 'hard' drainage systems should only be utilised once it has been demonstrated to the satisfaction of the National Park Authority, that sustainable drainage systems would not be successful.
- 4.168 The developer will be responsible for meeting all necessary costs for the planning, design and installation of sustainable drainage systems. Developers will also be required to enter into a planning obligation (known as a S106 Agreement) to meet the cost of adoption and providing long-term management. Natural Resources Wales does not support the inclusion of culverting and seeks the removal of culverting wherever possible. Pembrokeshire County Council, as consenting authority for ordinary watercourses, does not support culverting unless it is to achieve access into the land or property.

Renewable Energy

- 4.169 The policy framework for renewable energy below provides positive support for renewable energy proposals which take account of the Special Qualities of the National Park (see Policy 8).

Policy 33 RENEWABLE ENERGY (Strategy Policy)

Small scale renewable energy schemes will be considered favourably, subject to there being no over-riding environmental and amenity considerations. Medium scale schemes also offer some potential and will be permitted subject to the same considerations. Large scale renewable energy schemes will only be permitted where they do not compromise the special qualities of the National Park. Where there are other renewable energy schemes already in operation in the area, cumulative impacts will be an important consideration.

Onshore connections to off shore renewable energy generators will also be permitted subject to there being no over-riding environmental and amenity considerations. Developers requiring an undeveloped coastal location for onshore connections to offshore renewable energy installations will need to clearly justify this need in relation to Policy 8a) with the least obtrusive approach to design being taken.

- 4.170 The renewable energy policy above is supported by a Renewable Energy Assessment (updated January 2016)¹⁵⁵, which assesses:
- a) The technical potential for renewables
 - b) the potential environmental and socio-economic constraints
 - c) Taking account of a) and b) the resultant potential opportunities for a range of renewable energy

Likely contributions for renewable energy and carbon emissions are also set out and have been incorporated in the monitoring targets of the Local Development Plan (see Appendix 2).

¹⁵⁵ updated Renewable Energy Assessment (Jan 2016). Paragraph 67 of the Authority's Review Report refers to the need to update the Authority's Renewable Energy Assessment for this replacement Plan.

4.171 For the purposes of this policy the table below provides guidance on the meaning of the terms small, medium and large for the following technology:

Table 1 Renewable Technology

Renewable Technology ¹⁵⁶	Very Small/ Micro	Small ¹⁵⁷	Medium	Large
Wind ¹⁵⁸	Building or mast mounted	<25m	25m-65m	>65m
Ground Mounted Solar Photovoltaic Arrays	< 1 hectare	1 - 2.9 hectares	3 – 4.9 hectares	> 5 hectares
Anaerobic Digestion	Not applicable.	In the region of 10-50kW	Up to 2MW	Such facilities are likely to take waste from predominantly outside the National Park (see Policy 27).
Biomass	Not applicable.	<200kW	200kW – 1MW E.g to power community facilities/public buildings	>1MW E.g. Heat and Electricity power plant
Hydro	<100kW	A few hundred KW	No technical potential	No technical potential
Heat Pumps	Not applicable.			

4.172 With regard to large anaerobic waste facilities Policy 27 Local Waste Management Facilities advises that facilities that predominantly serve the National Park will be permitted. Proposals for ground, water and air source heat pumps will be considered in the context of their individual impacts upon amenity and the environment.

¹⁵⁶ Informed by the updated Renewable Energy Assessment (Jan 2016) and the guidance contained within the Renewable Energy Supplementary Planning Guidance prepared under the 1st Local Development Plan.

¹⁵⁷ Reference in the policy to 'small' includes 'very small/micro'.

¹⁵⁸ Values refer to blade tip height.

- 4.173 Supplementary Planning Guidance on renewable energy and on assessing the cumulative impact of wind turbines on landscape and visual amenity was prepared under the 1st Local Development Plan.¹⁵⁹ It is proposed that both guidance documents will be taken forward and updated to support the policies of the replacement Local Development Plan once that Plan is adopted. The guidance on renewable energy provides guidance on solar panels, anaerobic digestion, biomass plants, micro-hydro provision, ground and air source heat pumps, district heating, wind energy and on-shore grid connectors for off shore wind installations. It also includes a landscape sensitivity assessment¹⁶⁰ for field scale solar photovoltaic development and wind turbines for each landscape character area¹⁶¹ within the National Park.
- 4.174 There is also potential for offshore renewable energy developments which will have landward implications. As an exception to Policy 8a) the National Park Authority accepts that technically feasible routes for onshore connections may not be available only on the developed coast.¹⁶² Innovative design solutions can often overcome the adverse impacts of normally incongruous development in such a sensitive landscape. Consideration of environmental impacts will include designated sites, such as Natura 2000 sites and undesignated sites.
- 4.175 Please also see ‘Nationally Significant Infrastructure Projects and ‘Developments of National Significance in Wales’.

Flooding and Coastal Inundation

- 4.176 The strategy of the Local Development Plan accepts the need to adapt and deal with the consequences of climate change not just for the Plan period, but beyond. The coast is the most dynamic feature of the National Park changing daily, and climate change threatens to increase the rate at which the coast transforms, introducing challenges for communities to adapt to increased or new flood risks and coastal erosion.
- 4.177 The entire Welsh and English coastline is included in a series of Shoreline Management Plans. These documents produced by Local Authorities along with other key stakeholders, and approved in Wales by the Welsh Government, provide an assessment of risks associated with coastal processes and present strategic policies for coastal management that balance the many and often competing

¹⁵⁹ Pembrokeshire Coast National Park - SPG

¹⁶⁰ See 6. Glossary of Terms

¹⁶¹ See Policy 15 and Pembrokeshire Coast National Park - SPG on renewable energy

¹⁶² National planning policy advises that the undeveloped coast will rarely be the most appropriate location for development (Planning Policy Wales, Edition 9, November 2016, paragraph 5.7.2).

aspirations of stakeholders with proper regard for economic and environmental sustainability over a 100 year timeframe. They include policy statements for discrete lengths or management units of the coast broken shown into short, medium and long-term time bands. Two Shoreline Management Plans cover the coast of Pembrokeshire meeting at St Anne's Head near Dale.¹⁶³ These policy statements have been used to define 'risk areas' and are shown on the Proposals Map as 'Coastal Change Management Areas' (to be shown at in the Deposit Plan).

- 4.178 The National Strategy for Flood and Coastal Erosion Risk Management¹⁶⁴ seeks to reduce risk to individuals, communities, business and the environment. Property and buildings and the finances invested in them have life-spans beyond a few generations of people.
- 4.179 A small number of residential properties, businesses, sections of road and other assets in the National Park could be lost to coastal erosion and coastal inundation before the end date of the Local Development Plan (2031) and beyond that time more extensive areas of coastline are forecasted to be subject to increased risk from flooding, erosion and change. Adaptation to such change needs long-term action, hence the need to consider and deal with the consequences beyond the Local Development Plan period. Development should not be allowed to take place in areas where erosion or coastal inundation is likely to occur during the lifetime of the building.
- 4.180 There will also be a need to help communities or individuals adapt to the consequences of coastal change, including in certain instances the need for the relocation and replacement of community facilities, commercial and business uses that are considered important to coastal communities, and of homes affected by coastal erosion.

Policy 34 FLOODING & COASTAL INUNDATION (Strategy Policy)

In planning for the future development of the National Park;

- a) development will be directed away from those areas which are at risk from flooding now or as predicted for the future by Natural Resources Wales' Flood

¹⁶³ West of Wales Shoreline Management Plan:

http://www.westofwalesmp.org/content.asp?nav=23&parent_directory_id=10

South Wales Shoreline Management Plan:

<http://www.southwalescoast.org/content.asp?id=58>

¹⁶⁴ National Strategy for Flood and Coastal Erosion Risk Management

Maps or Welsh Government's Development Advice Maps or Shoreline Management Plan 2¹⁶⁵ unless there are sound social or economic justifications in accordance with the advice set out in Technical Advice Note 15 (see Policy 34A, 34B and 34C).

- b) sustainable defence of the coast will be permitted where it can be demonstrated that the works are consistent with the management approach for the frontage presented in the relevant Shoreline Management Plan and there will be no material adverse impact on the environment.

4.181 Consideration of environmental impacts will include designated sites, such as Natura 2000 sites and undesignated sites- see Policy 8 Special Qualities.

Policy 34A Development in the Coastal Change Management Area

New dwellings or conversion of existing buildings to residential use will not be permitted in the Coastal Change Management Areas (see Proposals Map).

Proposals for all other new development or the

¹⁶⁵ The Development Advice Maps are to be used alongside Planning Policy Wales, Edition 9, November 2016 and Technical Advice Note 15 to direct new development in respect of flood risk. Together they form a precautionary framework to guide planning decisions. The maps are based on Natural Resources Wales extreme flood outlines (Zone C, data revised 2015) and the British Geological Survey drift data (Zone B, 2004). The Flood Maps and Development Advice Maps do not include an allowance for climate change. More detail of the zones is identified in Technical Advice Note 15 (2004).

The Shoreline Management Plans identify areas liable to flood from the sea, with a long timescale. The data from these sources will be used to identify areas liable to flooding for the purposes of this policy. See West of Wales Shoreline Management Plan 2 for details of coastal policy from St Anne's Head to Poppit Sands:
http://www.westofwalessmp.org/content.asp?nav=23&parent_directory_id=10

See South Wales Shoreline Management Plan 2 for details of coastal policy from Amroth to St Anne's Head:
<http://www.southwalescoast.org/content.asp?id=58>

intensification of existing development or land uses in the Coastal Change Management Areas will be required to demonstrate that it will result in no increased risk to life or significant increase in risk to property, in addition to complying with all other relevant policies of the Local Development Plan

- 4.182 In recognition of the risks, development within the 100 year coastal change risk areas needs to be carefully controlled.
- 4.183 The area seaward of the line on the Proposals Map (to be shown at Deposit Stage) indicates the area forecast to be affected by coastal change based on the output from the two Shoreline Management Plans for the long-term (up to 2110). Although there is uncertainty about absolute timescales in the Shoreline Management Plans, it is assumed that the management for each coastal frontage area will be achieved via delivery of the stated management policies. The Shoreline Management Plans identify policy statements and forecast shoreline position in three time intervals (epochs):
- a) up to 2030 (short-term);
 - b) 2030 to 2060 (medium term); and
 - c) 2060 to 2110 (long-term).
- 4.184 This breakdown provides valuable information allowing an assessment of when particular properties or land is likely to be at risk from coastal change. Areas shown as being at risk in the 1st epoch are those where there is currently no effective defence or where existing defences are likely to fail within the time-period. Within these areas only a limited range of types of development directly linked to the coast, such as deck-chair and surf-hire, would be acceptable and any permission will be time-limited in order to manage risk.
- 4.185 Acceptable development within the medium-term risk areas may include extensions and some householder development. In the long-term risk areas a range of commercial and business proposals may be acceptable which can help to provide social and economic benefits for coastal communities. All proposals will also be subject to other policies contained in the Local Development Plan
- 4.186 For the purposes of this policy 'dwellings' include those used for full-time residential use, for second or holiday home use and those with occupancy restrictions.

Policy 34B Relocation of Existing Permanent Dwellings affected by Coastal Change

Proposals for the relocation of existing permanent dwellings in the countryside affected by coastal change will be permitted, provided that:

- a) The development replaces a permanent dwellings which is affected or threatened by erosion or tidal inundation within 20 years of the date of the proposal; and
- b) It is located an appropriate distance inland with regard to the Coastal Change Management Area and other information in the relevant Shoreline Management Plan and where possible it is in a location that is close to the coastal community from which it was displaced; and
- c) It is within or immediately adjacent to existing Centres close to the location from which it was displaced; or
- d) In the case of an agricultural dwelling, is within the farm holding or within or immediately adjacent to existing Centres; and
- e) The new dwelling is comparable in size to that which it is to replace;
- f) The existing site is cleared and made safe; and
- g) The proposal complies with all other relevant policies of the Local Development Plan.

Policy 34C Relocation and replacement of development(other than residential) affected by coastal change

Proposals for the relocation and replacement of community facilities, commercial and business uses that are considered important to coastal communities affected by coastal change will be permitted, provided that:

- a) The proposed development replaces that which is

forecast to be affected by erosion within 20 years of the date of the proposal; and

- b) The new development is located an appropriate distance inland with regard to the Coastal Change Management Area and other information in the relevant Shoreline Management Plan and where possible it is in a location that is close to the coastal community from which it was displaced; and
- c) The new building or land area is comparable in size to that which it is to replace; and
- c) The existing site is either cleared and made safe or put to a temporary use beneficial to the local community; and
- d) The proposal complies with all other relevant policies of the Local Development Plan.

Priority D: Visitor economy, employment

D. Visitor Economy, Employment

Visitor Accommodation, Attractions, Leisure Activities and Recreation

- 4.187 The strategy for visitors is to attract an optimal number, origin, type, duration of stay and spend of visitors all year round while ensuring that National Park environment continues to hold its attraction as a landscape of national and international importance. This is best achieved in land use terms by not adding substantively to the overall provision of visitor accommodation, as this could encourage further 'peaking' and cause damage to the National Park landscape and special qualities, both in terms of the impacts of the additional development and increased activity in some 'hot spot' locations.
- 4.188 Instead, the future for the National Park in this Local Development Plan is one where by the end of the Plan period a range of quality holiday accommodation, similar to the level and distribution of provision at the beginning of the Local Development Plan period, is retained to suit a range of pockets. Some additional caravan and camping provision is provided for along with changes within sites which allows for more innovative approaches to provision to be considered. Hotels and guesthouses that can provide accommodation and employment all year round are provided for and safeguarded unless they are no longer viable. Some additional self-catering is allowed to cater for all year round needs but this is restricted to instances where there isn't a priority to meet affordable housing needs.
- 4.189 Where new visitor related development (visitor attractions, recreational and leisure development and shore based facilities associated with off shore jetties etc.), is permitted it has been screened to avoid activities that would damage the special qualities the Park.¹⁶⁶ The development of a few all weather attractions has helped encourage more visits out of the peak season.
- 4.190 Traffic generation from visitor traffic is potentially a significant concern. A more rigorous approach to assessing traffic impact for such developments is required. Proposals that causing significant adverse impacts that cannot be mitigated are not permitted – see Policy 52 and Policy 53.
- 4.191 Supplementary Planning Guidance has been prepared to provide further advice on what would be inappropriate activities in the National Park for the 1st Local Development Plan. It is proposed that this guidance will be taken forward and updated to support the

¹⁶⁶ Inappropriate activities would be those that would damage the enjoyment of the special qualities of the National Park and this damage cannot be mitigated for example through zoning or traffic management measures or seasonally restricted activities.

policies of the replacement Local Development Plan once that Plan is adopted.

- 4.192 Local Development Plan Review Report June 2016: As part of Plan revision the Authority recognises the need to review a long-held policy of restraint on new chalet, caravan and camping sites in the National Park dating from the Dyfed Structure Plan prepared in the 1970's. Part of the rationale for this approach was the potential impact on the National Park landscape and also knowledge that there were a number of sites in the National Park with some capacity for further development. The latest survey based on 2013/14 shows however, that the available capacity has reduced and this has been coupled with increasing demand for new sites, additional pitches on existing sites and change over from touring/camping pitches to static caravan pitches. The Authority is also receiving regular notifications of sites operating without planning permission. This is testing the current Local Development Plan policy position. A consultant was commissioned to assess the capacity of the National Park landscape to absorb additional chalet, caravan and camping sites and pitches. The outcome of the Assessment (the Caravan, Camping and Chalet Landscape Capacity Assessment), which was published with the Review Report, is being used as a basis for engagement to inform the revision of relevant policies of the Plan and what changes need to be made. (Chapter 2d of the 2015 Monitoring Report also refers).
- 4.193 Options considered and Preferred Approach: A range of options were considered for this section of the Plan. These included options for caravan and camping and chalet development in light of the study conclusions above, approaches to the protection and provision of hotels, self-catering accommodation and visitor attractions. The [Background Paper Alternative Options and Appraisal](#) provides a summary of the options explored and the conclusions reached in terms of their performance against the sustainability objectives of the Plan and the tests of soundness.



To attract visitors outside the peak season while ensuring that National Park environment is conserved and enhanced as a landscape of national and international importance by:

- a) Allowing limited caravan, camping and chalet development (See Policy 38A)
- b) Permitting new hotels and guest houses within Centres or through the conversion of appropriate existing buildings¹⁶⁷ in the countryside.
- c) 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 36)
- d) Only permitting self-catering accommodation where the site or building is not appropriate for market or affordable housing provision on brownfield sites in the Local Development Plan's Centres or in conversions in the countryside (See Policy 37).
- e) Permitting visitor attractions, recreational and leisure activities in or adjacent to Centres. Proposals in the countryside will need to demonstrate why a 'Countryside' location is essential. Countryside proposals should make use of existing buildings whenever possible.
- f) Directing shore based facilities¹⁶⁸ to the developed stretches of coast where compatible with adjacent uses (See Policy 17).

¹⁶⁷ For definition of appropriate buildings in the countryside please refer to paragraph 4.44 (under Policy 7, Countryside) of the Plan.

¹⁶⁸ Structures and buildings associated with the shore or harbour or mooring provision or associated with equipment beyond the mean low water mark.

Activities which would damage the special qualities of the National Park will not be permitted. – see also Policy 8.

4.194 The policies below provide additional advice and guidance on the visitor economy.

Policy 36 Loss of Hotels and Guest Houses 

Loss of hotels and guest-houses in the National Park will be permitted where:

- a) the potential for continued use of the facility has been shown to be un-viable; or
- b) the overall demand for this type of accommodation during peak periods will continue to be met within the area; and
- c) there is no adverse effect on the appeal and intrinsic character of the resort, area or frontage.

Applicants justifying the loss of the hotel under criterion a) will need to show that a genuine marketing exercise has been undertaken prior to the submission of the application.

4.195 This policy aims to protect the existing stock of hotels and guest houses in the National Park. A good supply and range of serviced accommodation is essential, particularly as tourism is a dominant factor in Pembrokeshire's economy. As the holiday market has changed there has been sustained pressure to convert hotels and large guest houses to flats, apartments and private houses. Since 1990, there has been a loss of over 40 hotels within the National Park. This trend has slowed and since 2010 a small number of new hotels have been developed in the National Park. There may be opportunities to develop hotels and guest houses within Centres, through new build developments, redevelopments or conversion of existing buildings. Outside of Centres opportunities for new hotels and guest houses may be achieved through the conversion of appropriate buildings (see Policy 7d).

4.196 Hotels and guest houses often form part of the appeal and character of a town, village or area, which helps to attract visitors. In some instances, such as the Esplanade in Tenby, they form an intrinsic

element of the identity of a particular frontage. Larger hotels also often form important landmarks in the townscape or landscape.

4.197 It is acknowledged that the demand for different types of holiday accommodation will continue to change and this is acknowledged in the policy which allows the change of use of those premises which are no longer viable and have no realistic prospect of becoming viable.

4.198 Supplementary Planning Guidance on the loss of hotels has been prepared to provide further guidance on the application of this policy for the 1st Local Development Plan. It is proposed that this guidance will be taken forward and updated to support the policies of the replacement Local Development Plan once that Plan is adopted.¹⁶⁹

Policy 37 Self-Catering Development

Proposals for self-catering development will only be permitted on a brownfield site in a Centre¹⁷⁰ or in a conversion proposal in a countryside location (see Policy 7 and Policy 45).

The site or building must be shown to be inappropriate for market or affordable housing provision.

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

4.199 Self-catering accommodation is defined as non-caravan self-catering accommodation including rented flats, cottages, houses, bungalows and chalets, the primary purpose of which is for holiday letting.

4.200 This category would also include hostels providing low-priced overnight accommodation with a large proportion of dormitory accommodation, self-catering and facilities related to outdoor activities or field study. Hostels providing catering services will be regarded as serviced accommodation.

4.201 Purpose built self-catering units may help to take the pressure off using local housing for holiday accommodation. However, a balance needs to be struck and given the large number of holiday properties currently in the National Park the Authority will seek to prioritise the provision of affordable housing over self-catering accommodation where such opportunities arise. In principle all new market housing

¹⁶⁹ Weblink for the supplementary planning guidance:

www.pcnpa.org.uk/website/default.asp?SID=234&SkinID=5

¹⁷⁰ See 6. Glossary of Terms

(this is private housing for sale or rent where the price is set in the open market and their occupation is not subject to control by the local planning authority) can contribute to meeting the need for affordable housing.¹⁷¹

- 4.202 Where self-catering is permitted planning conditions will ensure facilities remain as units of holiday accommodation and are not occupied as a sole or primary residence. The term 'inappropriate' in policy wording refers to instances where amenity issues may arise for example from having full time residential development adjacent to or within an existing holiday complex.
- 4.203 This policy will be used to consider both new build and conversion to self-catering accommodation.

Caravan, Camping and Chalet Development

- 4.204 The Caravan, Camping and Chalet policy below is supported by a Caravan, Camping and Chalet Capacity Assessment (November 2015)¹⁷², which was a systematic assessment of the capacity of existing 28 Landscape Character Areas¹⁷³ (LCAs) to accommodate a range of different types of caravan, camping and chalet developments including emerging types of accommodation. It also provided advice on a Landscape Character Area basis as to whether existing sites can be upgraded, extended to increase accommodation, extended to improve appearance and/or whether new sites can be accommodated.
- 4.205 The findings of the landscape sensitivity and capacity study suggest that there is potential for certain limited scales and types development in some areas whilst maintaining a policy of restraint elsewhere.
- 4.206 The changing patterns of use from touring units to static units and the introduction of new types of leisure accommodation including 'glamping' indicate that the character of this development type is changing and is likely to continue to change. It is not possible to predict how the sector and different types of accommodation will evolve or how popular they will remain. Therefore policies are based on core principles and differentiate between the relative scale and permanence of development i.e. the difference between static units

¹⁷¹ Paragraphs 9.2.14 and 9.2.16 Planning Policy Wales, Edition 9, November 2016

¹⁷² Background Paper: Caravan, Camping and Chalet Capacity Assessment (November 2015)

¹⁷³ The Study relied upon the Landscape Character Assessment of the National Park which is adopted supplementary planning guidance to the 1st Local Development Plan (Adopted June 2011). The Landscape Character Assessment identifies 28 character areas within the National Park.

that are present all year round development and touring units, present for part of the season.

4.207 It is the Authority's intention to consult on and adopt the Caravan, Camping and Chalet Capacity Assessment as supplementary planning guidance to the policy below once the replacement Local Development Plan is adopted.

Policy 38A	Caravan, Camping and Chalet Development ¹⁷⁴	★
<p>New Caravan, Camping and Chalet sites and changes within existing sites will be considered away from the coast and Preselis and in locations not inter-visible with them.</p>		
<p>Extensions to existing sites will be considered where the extension is in a well-screened location.</p>		
<p>Extensions to existing sites with no increase in pitch numbers to achieve clear environmental improvement in relation to landscaping and layout will be permitted where existing sites have highly prominent parts, often visible from the coast and inshore waters, and where extensions allow pitches to be transferred to more discreet locations.</p>		
<p>Proposals coming forward as set out above must ensure:</p>		
<ul style="list-style-type: none">a) New development (including ancillary facilities) and changes within sites avoid sensitive locations and units are sited so that they can be readily assimilated into the landscape without harming the National Park landscape (see Policy 15).b) There are no adverse cumulative impacts when considered in conjunction with other development in the locality (see Policy 15).c) Any ancillary facilities should, wherever possible, be located in an existing building or as an extension to existing facilities. If no existing building is available the need for additional		

¹⁷⁴ This includes glamping. See reasoned justification for definitions.

facilities must be clearly demonstrated and commensurate with the scale of development.
(See also Policy 40)

- d) Enhancement opportunities achieve an overall environmental improvement whereby there are clear benefits in reducing the impact on the surrounding landscape.

4.208 The Caravan, Camping and Chalet Landscape Capacity Assessment (to be taken forward as supplementary planning guidance to this policy) provides both generic and detailed advice on what is meant by the term 'sensitive locations', how to assimilate proposals into the landscape and how to mitigate and enhance. The tailored recommendations and guidance for each landscape character area takes precedence over the generic guidance on siting, mitigation and enhancement which is set out in Appendix B to the Assessment.

4.209 Opportunities for new sites and extensions to existing sites are generally small-scale, catering for seasonal touring caravan or camping pitches. There may be a very small number of opportunities for medium scale proposals. Opportunities for new large-scale static sites were not found. Table 4 sets out what is meant by site size (small, medium large) and what is meant by the terms (seasonal or static). Size thresholds were derived from a preliminary assessment of a sample of different developments in the Pembrokeshire landscape taking into account the scale and pattern of the landscape.

Table 2 Definition of Different Types of Development

Type of development and site size	Definition
Static: large	Static units including caravans, chalets and pods/hard structure glamping options on a site above 3Ha.
Static: medium	Static units including caravans, chalets and pods/hard structure glamping options on a site >0.5Ha-3Ha.
Static: small	Static units including caravans, chalets and pods/hard structure glamping options on a site 0-0.5Ha.
Seasonal: large	Seasonal units including touring caravans, tents, soft structure glamping options such as yurts, tepees and safari tents above 3Ha.

Seasonal: medium	Seasonal units including touring caravans, tents, soft structure glamping options such as yurts, tepees and safari tents >0.5Ha- 3Ha.
Seasonal: small	Seasonal units including touring caravans, tents, soft structure glamping options such as yurts, tepees and safari tents 0- 0.5Ha.

- 4.210 The definition of touring units includes touring caravans, tents, trailer tents and motor-caravans, motorhomes, touring vans and campervans.
- 4.211 Glamping is defined as a form of accommodation which has been pre-erected on-site and can include yurts, tepees, pods, tree-houses and safari tents, although it can be provided by a range of other structures. The degree of locational permanence, scale and design will determine how these structures are considered.
- 4.212 Soft 'glamping' options such as yurts, tepees, safari tents and bell tents will be treated as touring units or seasonal development provided they are removed from site when they are not in use and/or for the majority of the year and the site allowed to grass over. Where associated fixed infrastructure such as decking, fencing or solar panels is proposed, the tents may be considered the same as static caravan development. Each proposal will be considered on a case by case basis.
- 4.213 Hard 'glamping' options such as pods or wooden tents or other hard structures may be considered to be the same as touring or static caravans or lodges in accordance with the statutory definition of a caravan in Appendix C of the Caravan, Camping and Chalet Landscape Assessment. This depends on whether the structure can be removed easily off site in one piece, if it has a permanent concrete base, is permanently connected to an electrical supply or to other services such as water and waste disposal, has ancillary structures such as decking, fencing or solar panels associated with it. The decision on its status will be made on a case-by-case basis.
- 4.214 Touring units should be removed from site when not in use. Storage for touring units should preferably be in suitable existing buildings or, in some limited circumstances in well screened, unobtrusive sites not visible from publicly accessible areas on land or sea.
- 4.215 Cumulative Impacts: In considering cumulative impacts a key principle to be applied is that if a particular type of development at a particular scale is acceptable in a given landscape character area this does not mean that, if implemented, that it would be appropriate or acceptable to increase the size or intensify the use of the site in future. The sensitivity of the Landscape Character Area would be likely to stay the same and the capacity may reduce in order to safeguard and meet the National Park's special qualities and purposes.

4.216 Conditions: A condition preventing year-round occupancy will be included on any permission granted. Seasonal use will usually be limited from beginning of May to end of September.

4.217 This policy excludes caravanning and camping permitted by the '28-day rule'¹⁷⁵, and sites operated under Certificates granted by Exempted Organisations¹⁷⁶.

Policy 38 Camping, Touring Caravans, Statics and Chalet Sites
Deleted

Policy 39 Upgrading Statics, Touring Sites and Tent Pitches
Deleted

Policy 40 Site Facilities on Camping, Chalet and Caravan Sites

Development of retail and other facilities on camping, 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.

4.218 It is accepted that chalet, caravan and camping sites generally require good quality washing and toilet facilities. In addition larger caravan and chalet sites may justify, for example, the provision of a camp shop, office, laundry facility or games room. Wherever possible such provision should be made by the adaptation or conversion of

¹⁷⁵ Schedule 2, Part 4, Class A of the General Permitted Development Order allows the use of land for various purposes – including the 'stationing of tents' for up to 28 days in any calendar year.

¹⁷⁶ The Caravan Sites and Control of Development Act 1960 gives certain organisations the right to allow landowners to establish small campsites on their land without the need for planning permission. Such sites can accommodate up to five caravans and motorhomes and up to 10 tents, space permitting.

existing buildings although it is acknowledged that new buildings will be required in some instances. The provision of catering, leisure or shopping facilities on a scale that exceeds the reasonable requirements of the occupiers of the site or which relates poorly to the size, character or location of the site will not be encouraged. Facilities of a larger size and scale may be considered in circumstances where such facilities are lacking in the immediate locality. The transformation of sites into self-contained holiday complexes providing extensive and inappropriate leisure or shopping facilities will be resisted. A balance must therefore be achieved between the need to maintain or improve the quality of facilities on site (having regard to site licensing requirements), and the need to safeguard existing facilities of nearby Centres.

4.219 On small sites in particular, the development of facilities in excess of those required by the licensing authority will be resisted. The provision of facilities under this policy will be expected to be accommodated within the confines of the existing site. In most instances, particularly in countryside locations, it will be appropriate to impose conditions on the grant of permission for such facilities to restrict their use to persons residing at the site. Such conditions will ensure that the scale of facilities remain appropriate for their intended purpose and will prevent undermining the vitality and viability of local facilities.

Policy 41 Change of Use from Tent Pitches to Touring Caravan Pitches Deleted

Employment

4.220 Pembrokeshire's economy reflects its peripheral location. Whilst there are a small number of large employers in the energy and service sectors the County relies on small and medium-sized enterprises to drive its economy, with over 94% of registered businesses employing less than 10 people. Twelve per-cent of the workforce are self-employed.

4.221 Most of the people who work in Pembrokeshire also live in Pembrokeshire and this correlation is particularly strong within the National Park.¹⁷⁷ The largest employers attracting people living outside of the immediate areas are located outside the National Park and mostly centred around the Haven Waterway and Haverfordwest. Nine percent of people who travel to work commute to Carmarthenshire (5%) and Ceredigion (4%). There is also a larger than Wales and UK average number of people self-employed in Pembrokeshire.

¹⁷⁷ See [Background Paper on Employment](#) for further information.

- 4.222 In line with the Wales Spatial Plan strategic employment provision in Pembrokeshire lies in the County Council's planning jurisdiction where strategic sites in the Council's Local Development Plan in particular on the Haven waterway, provide opportunities for employment growth close to the main centres of population. Small employment land allocations in the National Park authority's planning jurisdiction have not been delivered (viability and lack of developer interest are the two main issues) in the first Local Development Plan and the intention through revision is to respond to uncertainty by considering a more flexible approach through a criteria based policy approach.¹⁷⁸
- 4.223 In terms of accommodating business in Pembrokeshire as a whole, demand is for ready-built premises, rather than land. There is a need for both large units (above 10,000 sq ft) and B1 business units for offices, laboratories, clean products, research and development and creative businesses.¹⁷⁹ It is acknowledged that public sector provision of business premises has ceased and therefore ensuring a sufficient supply of office and business premises will now rely on engagement with the private sector to identify sites and opportunities.
- 4.224 The strategy for employment generation is to allow for small scale provision in the Park to enhance the socio-economic well-being of Park communities and also to help tackle seasonality issues with employment in the area. Large scale proposals are not considered compatible with the National Park designation. Small scale employment development is seen as development involving less than 2 hectares of land for business, general industrial or storage and distribution. This is complemented by additional policies for range of employment related uses (Policy 7 Countryside Policy 18 Porthgain, Saundersfoot, Solva and Tenby Harbours, Policy 23 Borrow Pits, Policy 24 Local Building Stone, Policy 27 Local Waste Management Facilities, Policy 33 Renewable Energy, Policy 35 Visitor Economy, Policy 43A Farm Diversification, Policy 47 One Planet Development, Policy 49 Retail in the National Park, Policy 55 Telecommunications and Policy 56 Powerlines and Pipelines).
- 4.225 To avoid significant trip generation the locations promoted are generally those where homes, shops and services are located or proposed to be located. The Plan does however recognise that extensions to established businesses in the countryside are sometimes needed along with the need for new businesses needing to join existing clusters. Assessing traffic impacts will be required. Those that cause significant adverse impacts that cannot be mitigated will not be permitted – see Policy 52 and Policy 53.
- 4.226 At the end of the Local Development Plan period it is envisaged that small scale employment sites have been unlocked and are being developed in some of the larger centres in the Park. Employment

¹⁷⁸ See Background Paper on Employment for further information.

¹⁷⁹ [Source document link to insert Sarah.](#)

uses have also been generated outside these areas. Many sites that have been in employment use for some time are still available for new users. Each harbour in the National Park continues to contribute positively both to employment in and the character of the area.

- 4.227 Local Development Plan Review Report June 2016: Planning Policy Wales, Edition 9, November 2016 paragraph 7.5.1 (penultimate bullet) advises of the need to include policies on farm diversification. The adopted Local Development Plan relied on national planning policy. A new policy on farm diversification has been inserted in the replacement Plan – see Policy 43A.
- 4.228 Also the revised Chapter 7 of Planning Policy Wales, Edition 9, November 2016 and Technical Advice Note 23 February 2014 provides for:
- a) A sequential approach to employment site selection (first preference to within the boundaries of settlements, second preference edge of settlement and third preference sites in the countryside.) Paragraph 1.2.7 of Technical Advice Note 23 Economic Development (February 2014) applies.
 - b) In making the selection the planning authority should consider jobs, accommodated alternatives available and special merit (Section 2.1 of Technical Advice Note 23 provides a detailed commentary).
 - c) In rural areas there are potentially two additional special contributions; the alignment of jobs and housing and the needs of expanding businesses or those new businesses needing to join an existing cluster. (Paragraph 3.13 of Technical Advice Note 23).
- 4.229 Chapter 2D of the 2014 Monitoring Report and the Background Paper on Employment refers.
- 4.230 Finally a report by the Joint Scrutiny Committee on the impact of the policies and work of the National Park Authorities on economic activity (for Snowdonia & Pembrokeshire National Park Authorities) was agreed by this Authority on the 29th July 2015. The relevant recommendations are being taken into account in the Local Development Plan revision. Chapter 2D of this Monitoring Report refers, as does the Employment Background Paper. The relevant recommendations relate to flexibility and monitoring (both tests of soundness for a Plan) and liaison with the economic development authority. The Employment Background Paper also refers.
- 4.231 Options considered and Preferred Approach: Three options for the scale employment were considered for the revision of the Local Development Plan.
- a) Direct small-scale employment proposals to appropriate locations within or adjacent to Centres or buildings suitable for conversion in the countryside.

- b) Direct small and medium-scale employment proposals to appropriate locations within or adjacent to Centres or buildings suitable for conversion in the countryside.
- c) Direct small, medium and large-scale employment proposals to appropriate locations within or adjacent to Centres or buildings suitable for conversion in the countryside.

4.232 Option 1 was considered to be the most sustainable.

Policy 42 EMPLOYMENT SITES & LIVE/WORK UNITS (Strategy Policy)



Employment opportunities will be provided and safeguarded through:

- a) Directing small-scale employment proposals to appropriate locations in or adjacent to the Local Development Plan's identified Centres or buildings suitable for conversion in the Countryside (See Policy 7d). Farm diversification can also assist. (See Policy 43A)
- b) Allowing extensions to established businesses and giving favourable consideration to new businesses aiming to join existing clusters in the countryside.
- c) Combining business uses with other uses such as community facilities or housing including live/work units.
- d) Protecting existing employment sites for employment use except in locations where the current use is not suited to the area or there is adequate provision already or the existing use is unviable. When considering a new use for a redundant employment site a community facility or market/affordable housing provision will be given priority. (See Policy 43)
- e) Protecting and enhancing the harbours at Tenby, Saundersfoot, Solva and Porthgain. (See Policy 18)

4.233 The term 'clusters' in criterion c) above means two or more B class uses sited adjacent to each other where the joining B class use demonstrates how it will derive benefit from co-locating.

4.234 Planning Policy Wales, Edition 9, November 2016 sets out clear statements of national development control policy on employment developments in rural areas. Please refer to Chapter 7 'Supporting the Economy'. Technical Advice Note 6 – Planning for Sustainable Rural Communities (2010) and Technical Advice Note 23, Economic Development February 2014 – Planning for Sustainable Rural Communities (2010) also provides detailed guidance.

4.235 The following policy and advice provide additional guidance on protecting employment sites.

Policy 43 Protection of Employment Sites and Buildings

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

- a) the present use is inappropriate for the locality; or
- b) there is adequate alternative provision in the vicinity; or
- c) the potential for continued use of the site or premises has been shown to be unviable. The feasibility of retaining existing uses should include offering the site or premises for sale on the open market for at least one year at a realistic price.

Where the loss of the employment site is justified a community use or market/affordable housing provision will be given priority where such a need exists and the site is suitable for such development (see also Policy 45 and Policy 48).

4.236 The aim of this policy is to prevent the inappropriate loss of existing employment sites and buildings to other uses, unless there are overriding benefits that can be attributed to the new development or there is adequate alternative availability elsewhere in the locality. 'Employment sites and buildings' means sites and buildings (whether currently in use or unoccupied) with planning permission, lawful use. In the National Park there is limited appropriate land to accommodate business developments. It is particularly important to protect existing sites such as former garage sites for reuse for employment undertakings and prevent redevelopment for other purposes. In criterion a) the present use will be judged in terms of compatibility of the nature and scale of the use within the local area and its impact on the local road network. In criterion b) the assessment of adequate

alternative provision in the vicinity will consider the capacity of existing uses, availability of vacant premises and employment sites. In criterion c) one of the objectives of the Plan is to ensure that the needs of local communities are prioritised in the use of land. This means that the delivery of affordable housing and/or the provision of community facilities will be considered as a first priority for the re-use of employment land. Other uses will not be supported unless housing or the provision of a community use is not suited to the site.

Farm Diversification

- 4.237 Broadening the economic base of farming activities is recognised as a means of improving the viability of the farm economy of the area.
- 4.238 It is important that any farm diversification scheme takes place on a genuine working farm registered as an agricultural holding and accords with the definition of 'Agriculture' as defined in Section 336 of the Town and Country Planning Act 1990.
- 4.239 Proposals may usefully be supported by robust Farm Plans which will give the Authority more information on how the scheme will help sustain the farm business. The functioning of the agricultural holding should not be prejudiced by the proposal.
- 4.240 In considering any diversification proposals, the Authority will have regard to the effects such proposals are likely to have on the amenity of neighbouring residents and the adequacy of existing road network to cope with any changes in traffic flows arising from the proposal. Many existing farms are located in isolated locations with access along narrow country roads.
- 4.241 Most farming enterprises are located within attractive countryside and any new building where justified should be constructed sympathetically within the landscape and be of an appropriate scale to its setting and surroundings. Any need for a new building and why existing ones are not suitable will need to be explained. Diversification proposals which re-use existing buildings will be viewed more favourably than those requiring the erection of new structures.

Policy 43A	Farm Diversification
	Permission will be given to farm diversification proposals where:
	a) The scheme takes place on a holding which is registered as an existing agricultural business; and
	b) The proposal assists in sustaining the farm

holding; and

- c) The proposal is compatible with its location; and
- d) The proposal is in harmony with and/or enhances the National Park landscape; and
- e) If a new building is justified it should be sited in or adjacent to an existing group of buildings;
¹⁸⁰and
- f) The vitality and viability of retailing and services of nearby Centres are not adversely affected.

Where such requirements are satisfied the National Park Authority will use conditions attached to the planning permission or require the applicant to enter into a legal agreement to ensure that the diversification proposal is tied in perpetuity to the agricultural holding.

¹⁸⁰ Guidance on siting new farm buildings has been prepared by the Authority which may assist and will be reviewed when the replacement Local Development Plan is adopted.

Priority E: Affordable Housing and Housing

E. Affordable Housing and Housing Provision

Demographic Analysis¹⁸¹

- 4.242 In Pembrokeshire the nature of the starting population and migrant population in the Pembrokeshire Coast National Park is different than outside the National Park. In short both groups tend to be older in the National Park than the rest of Pembrokeshire.
- 4.243 This has been borne out through projection work undertaken for the current adopted Local Development Plan and the replacement Local Development Plan. A population forecast prepared for the National Park area by Pembrokeshire County Council in 2008 indicated that the total number of National Park residents and households was likely to remain more or less as it was at the 2001 Census.
- 4.244 Also at that time two sets of population projections for National Parks were produced by Welsh Government statisticians – see Table overleaf. The 2006 figure shows a decline from the base date while the 2008 figure shows an increase of 1,288 units over the period 2008 to 2031. This was the equivalent of just over 55 dwellings per annum growth.
- 4.245 The 2011 figure shows just over 40 dwellings per annum growth and the 2013 figure shows a decline.
- 4.246 Household conversion ratios – Welsh Government advises that local planning authorities must use a household conversion factor when converting household numbers to dwellings. This enables vacancy rates, churn in the housing market and an element of ‘hidden’ households to be accommodated.
- 4.247 A household conversion ratio of 1.29 has been calculated for the Pembrokeshire Coast National Park.
- 4.248 The conversion rate is calculated by comparing the number of places in occupied households (10,277 Census 2011) with the total number of occupied households (10,277) plus the total holiday lets, second homes and empty properties (estimated 2,980 from Council Tax Records). Applying this to the 40 dwellings per annum growth figure above this would equate to a revised annual growth figure of 52 dwellings per annum.

¹⁸¹ New Welsh Government household projection figures are anticipated in May 2017 and will be taken account of prior to publication of the Deposit Local Development Plan.

Table 3 Welsh Government Population and Household Projections¹⁸² for Pembrokeshire Coast National Park

	2006	2008	2011	2016	2021	2026	2031
2006 based	10,141	10,224	10,341	10,448	10,452	10,302	10,014
2008 based		10,228	10,490 ¹⁸⁵	10,874	11,203	11,409	11,516
2011 based			10,274	10557	10812	11012	11104
2013 based			10,277	10,326	10,080	9780	9387

4.249 The 2013 population figures published by Welsh Government estimate that:

- the number of deaths in each of the three National Parks in Wales is to be more than the number of births.
- more people are expected to move to the Brecon Beacons than leave the area; for the Pembrokeshire Coast and Snowdonia more people are expected to leave the area than move in.

4.250 If relying solely on the latest household projection figures a no growth housing provision policy approach would be the outcome.

¹⁸² The Welsh Government population and household projections for National Parks are based on raw data for births, deaths, migration and household trends for National Park Areas. No additional National Park characteristics are taken into account. For more a detailed methodology of how population and household projections are calculated:

<http://gov.wales/docs/statistics/2010/100818housingtechnical06en.pdf>

¹⁸³ Welsh Government Household Projections for National Parks 2006 based

(<https://stats.wales.gov.uk/Catalogue/Housing/Households/Projections/National-Park/2006-Based/Households-by-NationalPark-Year>)

¹⁸⁴ Welsh Government Household Projections for National Parks 2008 based

(<https://stats.wales.gov.uk/Catalogue/Housing/Households/Projections/National-Park/2008-Based/Households-by-NationalPark-Year>)

¹⁸⁵ Actual number of households (with at least 1 usual resident) at 2011 census 10,277

4.251 The total affordable housing need extrapolated over a 15 year Plan period would be 370 (per annum need) multiplied by 15 which would total 5,550 affordable housing units. The need is greater than any historic dwelling completion rate for the National Park.

4.252 The table below shows:

- the proportion of households in each tier of the Plan area in 2011.
- the level of housing need as identified in the Local Housing Market Assessment for the period 2014 to 2019 for each tier.
- the annual average completion rates for the period 2005 to 2015 in each of the tiers.
- how closely the percentage distributions of households, affordable housing need and completions match.

Table 4 Housing Need and Completion Rates

	2011 Households	% of Total	Community Council/ Group of Housing need per year 2014 - 2019 (Total)	5 Year Need	% of Total	Annual Completion Rate 2005 to 2015	% of Total	Using Historic Annual Delivery Rate 2005 to 2015 60 per annum 16 Year Provision
Tenby	2253	22%	88	440	24%	16	27%	256
St Davids	851	8%	34	171	9%	5	8%	80
Newport	583	6%	24	120	6%	2	4%	32
Saundersfoot	1200	12%	45	225	12%	9	16%	144
Rural Centres & Countryside	5390	52%	178	892	48%	27	46%	432
Total	10277	100%	370	1848	100%	59	100%	944

4.253 Table 4 above shows how affordable housing need tends to correlate with the proportion of households in each location and the rates of development in each tier. Provision apportioned in this way (in accordance with existing households) would proportionally reflect where affordable housing needs to be provided and where the market has been supportive in providing housing in the past. It would also reflect the spatial strategy of the Plan which seeks to locate

¹⁸⁶ A new Local Housing Market Assessment is due for publication in the summer of 2017 and will need to be considered prior to the publication of the Deposit Local Development Plan.

development in the most sustainable locations where services are available.

Past Delivery Rates

- 4.254 Overall historic completion rates help to provide a picture of what the market is likely to support in terms of rates of development.
- 4.255 Given the small size of many of the sites, building in the National Park is carried out by small and medium sized firms. Volume builders are not currently operating in the National Park (March 2017).
- 4.256 The figures above are showing an average of 60 dwellings per annum being completed over the period 2005 to 2015¹⁸⁷. Depending on the 10 year period chosen (see Housing Background Paper Table 6) the completion figure can range from an average of 57 to 94 dwellings per annum.
- 4.257 The Authority in the adopted Local Development Plan sought to increase the supply of housing land to deliver more affordable housing but the overall provision was too ambitious (expectations of over 100 dwellings per annum over the Plan period) as was the expectation for affordable housing delivery (expectations of 530 over the Plan period). There were also issues around the deliverability of some sites allocated in the adopted Local Development Plan so their replacement with deliverable sites could boost potential supply and delivery in some locations to some extent. The total provision for the last Plan was an estimated 1,600.
- 4.258 An expectation of 60 dwellings per annum completion rate for this replacement Plan would mean a need to provide an estimated 940 dwellings. Adding a potential contingency figure of 10% would take the figure to an estimated 1040 dwellings provision (up to 100 dwellings as a contingency).
- 4.259 Referring to Housing Background Paper Table 6 an expectation of 90 dwellings per annum completion rate would mean an estimated 1,420 housing provision figure. Adding a potential contingency figure of 10% would take the figure to an estimated 1,562 (up to 142 as a contingency).
- 4.260 The Housing Background Paper Table 6 provides a count of rolling 10 year average completion rates. The number of times the 90 or above per annum completion figure was achieved over a 10 year period was 4 times out of the 13 times the figure was calculated, 80 or above completions happened 8 times (60% of the time), 70 or above was 9

¹⁸⁷ [Housing Background Paper](#) Table 6

times (70% of the time) and 60 or above 12 times (90% of the time). An expectation of 70 dwellings per annum would result in a figure of an estimated 1,100 dwellings with a potential contingency figure of 10% taking the figure to an estimated 1,210 (up to 110 contingency).

- 4.261 The overall likely future pattern of development based on past experience shows that there are some locations where the pick of sites for development could influence future completion rates more positively than the 60 per annum figure used for comparison in Table 4 above. However, in other locations there are difficulties in finding deliverable sites which will have a negative influence on the overall figure.
- 4.262 Below is a more detailed description of the issues by each tier in the spatial hierarchy.
- 4.263 **Tenby (Tier 2):** Historically Tenby's completion figures have benefitted from opportunities to convert and redevelop existing sites and buildings within the town itself. The majority of sites that have been allocated in previous development plans in Tenby have however not progressed (see Joint Housing Land Availability Report 2016). They were potentially substantial contributors to the land supply. Although it would be preferable to make most provision in this Town, given its level of affordable housing need and the ability of the market to support affordable housing development,¹⁸⁸ it is now constrained by lack of developable land, sea to the south, a tight National Park boundary and landscape setting. Progress on sites on the candidate site register that are currently not being considered as part of the housing land supply but are allocated in the current Local Development Plan will be monitored and their appropriateness for allocation re-considered prior to the Deposit Plan being published should substantive progress be made. At present (May 2017) given current information available the delivery rate is anticipated to be about the 16 per annum shown for 2005 to 2016 period in the table above.
- 4.264 **St Davids (Tier 3):** The rate of development in the City has been constrained in recent times due to difficulties in bringing forward the Glasfyn Lane allocation, a substantial allocation in size. Smaller sites provided for in the current Plan have not come forward primarily as a result of a lack of land owner interest. The Glasfryn Lane site is now being unlocked with the benefit of road improvements and the work of the local Community Land Trust. Housing delivery here could therefore be slightly higher than past completion rates would suggest (2005 to 2015 figures show a completion rate of 5 per annum).

¹⁸⁸ [Affordable Housing Study, A Golland December 2016](#)

- 4.265 **Newport (Tier 3):** Historically Newport has also been constrained with few sites being taken forward when development plans are finally adopted. The future looks more positive with the anticipated progression of the Feidr Eglwys site from the current Local Development Plan and the identification of suitable candidate sites by the Authority at this stage of Plan preparation. A more optimistic provision is therefore feasible than the 2 dwellings per annum shown in Table 4 above.
- 4.266 **Saundersfoot (Tier 3)** At present (May 2017), beyond current planning permissions that are likely to come forward during the Plan period sites submitted show potential but require further investigation. See Candidate Site Register for further detail. These if all added to the housing land supply for the Deposit Plan could potentially return Saundersfoot to more historic rates of completion (19 per annum late 1980s to mid 1990s). There are however several issues that need to be considered and resolved regarding these sites including the likelihood that larger sites would be developed out beyond the replacement Plan period.
- 4.267 **Rural Centres and Countryside (Tier 4 & 5):** Annual completion rates between Rural Centres and the Countryside between 2005 and 2015 were almost evenly split. Looking at candidate site opportunities in the Rural Centres the split should be more predominantly in favour of Rural Centres in the future. Overall historically a completion rate of 27 per annum is recorded between 2005 and 2015. Rural Centres show a potential for delivery of an estimated 24 dwellings per annum given the information available as at May 2017. There are sites in villages that are toned orange on the Candidate Site Register which could potentially add to the supply but further investigation is needed.
- 4.268 Therefore the 60 to 70 per annum average overall is considered deliverable in principle.
- 4.269 In arriving at the preferred policy approach (Policy Option 2) two options have been considered for housing growth for this replacement Local Development Plan.

Option 1: A policy based on the latest Welsh Government National Park Household Projections.
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This policy option is likely to secure provision of an estimated 700 dwellings (including contingency) and an estimated 110 affordable housing dwellings.

- 4.270 National planning policy advises that the latest Welsh Government household projections alongside the latest Local Housing Market Assessment will form part of the plan's evidence based together with

other key issues such as what the plan is seeking to achieve (paragraph 9.22, Planning Policy Wales, Edition 9, November 2016).

- 4.271 If the Authority relies on the most recent projection work and not plan for any future housing growth the Authority would be reliant on affordable housing being provided primarily through the Registered Social Landlords and the Housing Authority if it begins a development programme. There would be some existing commitments that are to be completed and windfall opportunities which could provide for or contribute to affordable housing provision.

Table 5 Housing Provision Estimate Option 1

Contribution	Total Housing Provision ¹⁸⁹	Affordable Housing
Planning Permissions	205	70
Windfalls	496	40
Total	701	110

- 4.272 Deliverability of this policy option is questionable. Housing Associations and the Housing Authority would need to compete on the open market for a small number of sites which may be more difficult to secure. Achieving viability in conversions and regeneration sites is questionable. Exception sites historically have also only contributed small numbers.
- 4.273 The amount of affordable housing needed in the National Park is greater than can be provided by public subsidy through Social Housing Grant – unless the money available for such subsidy is increased to an enormous degree.
- 4.274 The sustainability appraisal of Option 1 raised particular issues regarding the potential use of the private car and the unlikelihood of such developments being viable in conversion and regeneration opportunities. It would score well in terms of contributing to cultural distinctiveness if such a policy was deliverable.
- 4.275 In terms of the soundness tests Option 1 would be difficult to justify that the Authority is providing as many opportunities as it can to deliver affordable housing. Welsh Government in seeking to see the delivery of affordable housing requires authorities to use all available policy levers to their full potential, including the planning system.¹⁹⁰
- 4.276 Opportunities to include more land and to use cross-subsidy would boost provision and help respond to the affordable housing need identified in the Local Housing Market Assessment. Historic delivery rates would also show that the market can support additional levels of housing provision.

¹⁸⁹ Taken from the Components of Housing Land Supply Tables 6 and 7

¹⁹⁰ Letter of the Cabinet Secretary for Environment and Rural Affairs 23 February 2017.

4.277 This is therefore not a preferred policy option.

Option 2: A policy based on providing for market housing to cross subsidise the provision of affordable housing. Affordable housing need exceeds that which the market housing can provide for.

The key determinants for what can be provided are the:

- distribution of housing development in accordance of with the Plan's spatial strategy
- the deliverability of sites
- the National Park's landscape capacity to absorb additional housing development.

This policy option is likely to secure in principle a deliverable housing provision in an estimated range of 940 to 1,100 dwellings. A contingency will also be added to the provision in accordance with Welsh Government requirements.

The key determinants for a more precise overall provision figure and contingency figure will be the distribution of housing development in accordance with the Plan's spatial strategy, the deliverability of sites and the landscape capacity of the National Park.

4.278 Household projection figures would suggest that there is little justification to make a housing provision in the replacement Local Development Plan.

4.279 The background to the decline in households in National Parks in Wales is that the number of deaths in the National Parks is estimated to be more than the number of births and more people are expected to leave the area than move in.

4.280 The 2014 Local Housing Market Assessment suggests however that there is a significant need for affordable housing in the National Park: an estimated annual requirement of 370 units for the period 2014 to 2019.

4.281 Therefore, although there is no reason to allocate housing land in order to house an increasing population, there is in order to build a greater number of affordable houses and help support local communities. How to tackle affordable housing need in the Park is one of the key issues for this Plan.

4.282 Option 2 sets out a housing provision which in principle should be deliverable based on historic rates of development.

4.283 Option 2 scored best overall in terms of sustainability appraisal and the soundness tests.

4.284 If we wish to maintain the special qualities of the National Park, the amount of housing that can be built is limited by the capacity of the landscape to absorb it without significant impact. This is an overarching issue to address.

4.285 In terms of the soundness tests Option 2 is the most compliant with national planning policy in its drafting and in the derivation of the housing land supply. Option 2 takes account of the need for housing/affordable housing in the area, viability testing and deliverability. Option 2 policy requirements will be based on the most up to date advice available on affordable housing need, viability assessments and deliverability evidence.

4.286 For these reasons Option 2 is the preferred option.

4.287 The table below shows the overall potential housing land supply for the Local Development Plan as at May 2017. Further work is required.

Components of Supply

4.288 The base date for the Plan is April 2015.

4.289 The table below identifies the components of land supply.

4.290 The Authority has relied on the Joint Housing Land Availability Study 2016 regarding the likelihood of sites of 5 or more dwellings coming forward in the period 2016 to 2021. The supply comprises of sites with outline or full planning permission, sites with a resolution to grant planning permission subject to the signing of a section 106 agreement and sites allocated for housing in the adopted local development plan, categorised as prescribed in Technical Advice Note 1.¹⁹¹ This study influences the figures provided in the table below. In the table overleaf:

- A: sets out total completions for small and large sites between April 2015 and April 2016.
- B: A figure is not included for under construction.
- C: Units with planning permission 1st April 2016: The figure provides a figure for planning permissions as at 1st April 2016. The figure is discounted to take account of the likelihood that all sites will not be delivered. This relates primarily to issues known regarding some larger sites with permission (sites of 5 or more units). The overall result is a discount of 25%.
- D: The figures are taken from the Candidate Site Register (as at May 2017) and identify sites of 5 or more dwellings capable of delivering 2 or more affordable dwellings onsite using the affordable housing percentages shown in Table 8 under Policy 45 Affordable Housing and are currently toned as green on the Candidate Site Register. Those sites that are capable of delivering 2 or more affordable dwellings on site and can accommodate 5 or

¹⁹¹ [Technical Advice Note 1 Housing Land Availability](#) 2015

more dwellings will be allocated (toned on the Proposals Map) in the Deposit Local Development Plan. The Authority does not intend to allocate land that is not capable of delivering 2 or more affordable dwellings on site. 30 Dwellings per hectare density is used unless there is more up to date information available such as an advanced pre-application or a planning permission in place post April 2016 or if the site has been assessed for the previous Local Development Plan and there is information on the estimated number of dwellings that are feasible on the site.

- E: large windfall sites (5 or more unit sites): Reflects the completion rate on five or more unit windfall sites between 2007 and 2016. The figures have been reduced by 40% for Tenby to reflect reduced opportunities over time as referred to earlier in the Chapter. Sites of 5 units or more which are toned green on the Candidate Site Register but are not able to provide 2 or more affordable houses on site could contribute to this provision.
- F: small windfall sites (less than 5 unit sites): F is derived from the Joint Housing Land Availability Study 2016 and is distributed according to the number of households in each tier. Sites of less than 5 units which are toned green on the Candidate Site Register could contribute to this provision.

4.291 Please note the percentage figures for affordable housing provision used to calculate Row D are set out in the Table under Policy 45 of the Preferred Strategy and are extracted from the December 2016 Affordable Housing Study prepared by Dr Andrew Golland on behalf of the Authority. The Affordable Housing Study and the Table will require review prior to the Deposit Plan being finalised. Particular issues that require further investigation include the level of planning obligation being applied, the inclusion of sprinkler costs and the findings of the Longitudinal Viability Study of the Planning Process published by Welsh Government January 2017. There was insufficient time to explore all these matters satisfactorily prior to the Preferred Strategy consultation commencing.

4.292 The revision of the Affordable Housing Study will therefore also potentially have implications for how Candidate sites have been assessed for allocation. The Authority is applying a minimum threshold of five or more housing units that can deliver at least two affordable housing units on site for allocation purposes (i.e. identifying sites on the Proposals Map). The Authority has sought information from housing site proposers regarding development costs anticipated on those sites that in principle met the threshold based affordable housing percentages shown in the Affordable Housing Study. This is in keeping with Recommendation 2 of the Longitudinal Viability Study of the Planning Process published by

Welsh Government January 2017. The information provided will be taken forward as part of the preparatory work for the Deposit Local Development Plan.

Table 6 Components of Housing Land Supply

	Components of Housing Supply	Tier 2 Tenby	Tier 3 Crymych St Davids Newport Saundersfoot	Tier 4 Rural Centres	Tier 5 Countryside	TOTALS
A	Total completions (small and large) 01.04.15 – 31.03.16	14	5	14	13	46
C	Units with planning permission 31.03.16	42	42	81	40	205
D	Strategy compliant candidate sites/allocations (subject to further refinement)	33	137	171	0	341
E	Large windfall sites (+5) 15 years remaining	101	37	5	10	153
F	Small windfall sites (-5) 15 years remaining	75	89	103	79	346
G	Approximate housing provision	265	310	374	142	1091

4.293 The same table is set out below but just includes affordable housing.

Table 7 Components of Affordable Housing Land Supply

	Components of Affordable Housing Supply	Tier 2 Tenby	Tier 3 Crymych St Davids Newport Saundersfoot	Tier 4 Rural Centres	Tier 5 Countryside	TOTALS
A	Total completions (small and large) 01.04.15 – 31.03.16	0	0	0	1	1
C	Units with planning permission 31.03.16	17	22	25	6	70
D	Strategy compliant candidate sites/allocations (subject to further refinement)	15	57	56	0	128
E	Large windfall sites (+5) 14 years remaining	20	5	0	0	25
F	Small windfall sites (-5) 14 years remaining	10	5	0	0	15
G	Approximate affordable housing provision	62	89	81	7	239

- A: a large number of affordable houses were under construction in 2015-2016 which will be reflected in completions figures for the year 2016-2017.

Policy 44 HOUSING (Strategy Policy) ★

Based on the level of anticipated affordable housing need, balanced against deliverability and landscape capacity provision is made for between an estimated 940 to 1,100 housing units between 2015 and 2031. A contingency¹⁹² will also be provided.

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 7 will need to be compatible with the existing character of the area.

Policy 44A	Housing Allocations (to be added at Deposit Stage) The following sites are allocated for housing:					
Location	Proposals Map ID	Site Name	Area Hectare	Est Units	% Affordable Units	Indicative Affordable Housing Target

4.294 The Candidate Site Background Paper provided the methodology that was used to assess sites submitted during the Candidate Site Submission stage. A provisional view on which sites accord or do not accord with the Preferred Strategy has been taken and can be viewed on the Authority’s website. Where sites are not proposed at this stage by the local planning authority they could be introduced later in the plan making or examination processes if the need arises. The Preferred Strategy consultation is the appropriate time to make representations on any sites identified or to put forward new ones.

4.295 The Background Paper will be used again, alongside the emerging preferred policy option for housing growth, to consider new sites submitted or alterations to already registered sites during the Preferred Strategy consultation period.

¹⁹² A contingency allowance will allow sufficient flexibility for the non-delivery of sites and unforeseen issues.

4.296 In summary the main criteria for selection for allocation are:

- **Site Size:** A threshold of sites that are capable of accommodating 5 or more units and delivering 2 or more affordable dwellings will be potentially allocated in the Plan for housing.
- **Acceptability in terms of location:** Development in the countryside is strictly controlled. Residential development, in particular which is remote from Centres (listed in Policies 2 to 5 and 6) is unlikely to be carried forward.
- **Acceptability in terms of scale of housing proposed:** The preferred policy option for the scale of provision anticipated overall is set out in Policy 44. The introductory text to this Chapter outlines the scale of provision anticipated in the various tiers of the spatial strategy.
- **Impact on the National Park landscape:** Constraints such as impact on the National Park landscape or nature, Conservation Areas, Listed Buildings, flooding etc.
- **Infrastructure:** New development can place additional pressures on existing infrastructure such as highways, water supply, drainage and sewage capacities as well as local facilities such as schools, medical and recreational facilities.
- **Access:** Consideration will be given to the suitability of vehicular/pedestrian/cycle access to and from the site.
- **Financial Viability:** the Authority needs to be confident that any allocated site has a realistic prospect of being developed for its intended use within the Plan period – up to 2031.


4.297 Sites will also be considered through related assessments that are triggered by preparing a plan of the nature and scope of the Local Development Plan. These are:

- Strategic Environmental Assessment/Sustainability Appraisal (SEA/SA)
- Habitats Regulations HRA (where required for Deposit Stage allocation)
- Equalities Impact Assessment (where required for Deposit Stage allocation)
- Welsh Language Impact Assessment (where required through the Sustainability Appraisal)

4.298 Appendix 1 'Allocations' provides background information on some sites (to be added at Deposit Stage).

4.299 As part of the Land Allocation Implementation Study (to be prepared for the Deposit Local Development Plan) a housing trajectory will be prepared for the Deposit Local Development Plan to demonstrate housing delivery over the Plan period. The study will also provide information on site availability, the amount of infrastructure required, the indicative costs and any mitigation requirements.

4.300 Density: To make best use of the land made available a minimum density of 30 dwellings per hectare is proposed in the Local Development Plan's identified 'Centres' where this is compatible with the character of the Centres.

Policy 45 AFFORDABLE HOUSING (Strategy Policy) 

To deliver affordable housing the National Park Authority will:

- a) Seek to negotiate affordable housing to meet the identified need on housing developments in the housing submarket areas and Centres as set out in Table 8 below.¹⁹³
- b) Seek an off-site affordable housing contribution to help with the delivery of affordable housing on:
 - Housing developments where the requirement for affordable housing provision would result in less than 2 affordable dwellings or where the provision of an affordable dwelling on site is not possible¹⁹⁴
 - infill and rounding off opportunities in the countryside (Policy 7)
 - Conversion opportunities in the countryside (Policy 7)

¹⁹³ This excludes indicative targets for housing allocations in the Plan which will be set out in Policy 44A – to be added to the Deposit Local Development Plan

¹⁹⁴ Where the percentage of affordable housing required on a site results in a fraction of a unit then an affordable housing contribution will be expected.

- c) Allow the exceptional release of land within or adjoining Centres for affordable housing to meet an identified local need.¹⁹⁵

When considering a new use for a redundant community facility an employment use or housing contributing to or providing affordable housing will be prioritised. When considering a new use for an employment site a community use or a housing development contributing to or providing affordable housing will be given priority. The percentage affordable housing requirements and contributions set out below will be sought.

Where it can be proven that a proposal is unable to deliver (i.e. the proposal would not be financially viable) in terms of the policy requirements of the Plan (i.e. for affordable housing provision, sustainable design standards expected and community infrastructure provision) priority will be given to the delivery of affordable housing in any further negotiations, provided that it can be demonstrated that the proposal would not unduly overburden existing community infrastructure provision.

Where a planning application is received for a site below the affordable housing threshold but which is part of a larger site which is above the threshold then the Authority will expect affordable housing to be provided. This is to ensure that sites are not broken up into smaller portions and phased which would avoid the requirement for affordable housing.

The affordable housing target for the Plan period is an estimated 250 affordable housing units.

4.301 The approach to affordable housing delivery is to:

- a) Use market housing to cross-subsidise affordable housing delivery.

¹⁹⁵ Affordable housing on exceptions sites should meet the needs of local people (paragraph 9.2.23 of Planning Policy Wales, Edition 9, November 2016). Low cost homeownership will not be supported on exceptions sites.

- b) Prioritise the delivery of affordable housing over other land uses for example by not allowing new build self-catering in the countryside. Brownfield provision of self-catering is permitted in Centres and the countryside but only where there the site or building is unsuitable for market or affordable housing – see Policy 37. Also, when finding new uses for community facilities and employment sites that are no longer required uses beneficial to the community (including affordable housing delivery) are prioritised – see Policy 43 and Policy 48. Priority is also given to securing affordable housing through S106 agreement negotiations (see Policy 45).
- c) Use new or replacement conditions on rural enterprise dwellings which will mean some limited opportunities may become available for affordable housing.

4.302 The threshold of less than two affordable dwellings for offsite provision reflects the resources needed in negotiating and subsequent managing of small numbers of affordable housing on-site.

4.303 Affordable housing contributions are managed by Pembrokeshire County Council as the housing authority. The Authority’s supplementary planning guidance prescribes the local area within which such funds should be spent.¹⁹⁶ The guidance will require review when the replacement Plan is adopted. The contributions fund a variety of proposals. The County Council has prepared a framework for spending contributions.¹⁹⁷

4.304 In order for sites to be considered as exceptions sites a need for affordable housing must be shown and there must be a mechanism for making sure the properties remain affordable in perpetuity. In the case of Low Cost Home Ownership, experience has shown that no mortgage lender will lend without a mortgagee in possession clause being included within a Section 106 legal agreement. As such a clause enables the re-sale of the property without restriction (in circumstances where the property is re-possessed), this does not guarantee that it will remain affordable in perpetuity. The Authority is keen to ensure that exception sites do not become market sites over time as a result of such clauses. Given this situation, exception sites will only be permitted for affordable rented properties.

Table 8 Percentage of Affordable Housing for Housing Submarket Areas

Housing Submarket Area	Post Code Area	Local Centre	Rural Centre	% of affordable dwellings
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¹⁹⁶ Affordable Housing Supplementary Planning Guidance

¹⁹⁷ Use of Affordable Housing S106 Contributions

Housing Submarket Area	Post Code Area	Local Centre	Rural Centre	% of affordable dwellings
Newport	SA42 0	Newport	Dinas Cross Nevern	50%
Tenby	SA70 7	Tenby	Jameston Lydstep Milton Manorbier Manorbier Station	50%
South East Coast	SA69 9 SA70 8 SA67 8	Saundersfoot, Tenby	Amroth Jameston Milton New Hedges Pleasant Valley Summerhill	45%
St Davids and North Coast	SA62 6 SA64 0 SA62 5	St Davids	Roch, Newgale, Solva, Trefin, Square and Compass	30%
South West Coast	SA71 5	N/A	Angle Bosherston Stackpole	20%
St Brides Bay	SA62 3 SA73 3	N/A	Little Haven Broad Haven Dale Marloes St Ishmaels Herbrandston	15%
Estuary Hinterland	SA68 0 SA62 4 SA73 1 SA72 4	N/A	Cosheston Hook Lawrenny Llangwm Houghton	10%
North East NP	SA65 9 SA43 3 SA41 3 SA63 4 SA66 7	Crymych	Felindre Farchog Pontfaen Rosebush	10%

4.305 The Authority recognises that it will need to monitor changes in values and costs as they affect viability. The following key indicators will be monitored:

- a) House prices – data which includes second hand as well as new properties and provides a robust indicator of price trends.
- b) Build costs – Pembrokeshire benchmark build costs and relevant BCIS index; and,
- c) Affordable rents – Local Housing Allowance data.

4.306 The Authority will consider if there is a 10% change (plus or minus) in any one indicator sustained over a 12 month period or if:

- a) There is a plus or minus change of between 5-9% in any two indicators sustained over a 12 month period; or,
- b) There is less than 10% change in indicator(s) but change is being sustained or if evidence indicates that sustained change has occurred in other development costs e.g. finance costs, developer return required.

4.307 This assessment will be carried out annually and published in the Annual Monitoring Report on the Authority's website. The Authority will consider if changes are needed and whether this would require a selective review in advance of the 4-yearly formal requirement.

4.308 The Authority is committed to ensuring delivery of the most appropriate type of affordable housing to meet the needs of the community. The Pembrokeshire 2014 Local Housing Market Assessment indicated that the predominant need for affordable housing in all parts of Pembrokeshire is for social rented properties (83%). Pembrokeshire County Council also has evidence from monitoring work of Low Cost Home Ownership applicants encountering difficulties in gaining mortgages. Furthermore, the Council's experience of the re-sale of these properties has been that occupants who have benefited from the Low Cost Home Ownership property have often not fully understood the nature of the ties associated with the property and are discontent with the process involved. For all of these reasons, this Authority is keen to prioritise the delivery of rented affordable properties, where this is a requirement through a S.106 agreement on market sites. As a result, on market sites, where an onsite contribution or provision is necessary, the Authority will require the delivery of social and/or intermediate rented properties. Low Cost Home Ownership properties will not generally be sought.

4.309 The following policies and advice provide additional guidance on housing.

Gypsy and Traveller Sites

Policy 46 Gypsy and Traveller Sites

Proposals for Gypsy and Traveller sites will be permitted where:

- a) evidence of need to locate or provide transitory arrangements in the area has been identified; and
- b) the site is well located to serve the needs of Gypsy and Travellers including the need to access local services; and
- c) the site has good access to a public road which is safe and direct; and
- d) the site is suitable for the development and on site services facilities can be adequately provided; and
- e) amenity issues for both residents on the site and neighbouring properties are adequately addressed; and
- f) the proposal does not cause significant visual intrusion, is sensitively sited in the landscape and satisfactory landscaping is provided.

4.310 The Pembrokeshire County Council 2015 Gypsy Traveller Accommodation Need Assessment (2015 GTANA) sets out the need for Gypsy and Traveller sites and Travelling Showpeople's yards in Pembrokeshire.¹⁹⁸ To help plan future provision, this need has been grouped into three geographic areas outside the National Park. These are Haverfordwest, Pembroke and Pembroke Dock and Kilgetty. These areas reflect the general locations within which residents have expressed a desire to live. Although there are family connections between areas, typically residents have a closer association and a preference to live within one area, usually linked to the existing Local Authority site in that area.

4.311 An opportunity to help address the shortage of Gypsy and Traveller sites has been provided with the National Park Authority inviting the submission of Gypsy Traveller sites as part of the Candidate Sites submission process. No sites were submitted for consideration.

4.312 The potential for negative effects on Natura 2000 sites is unlikely but remains dependent on the scale and location of the site. The reference to 'direct' access means there is a requirement for the access to the site to be directly from the public highway.

¹⁹⁸ Pembrokeshire County Council 2015 Gypsy Traveller Accommodation Need Assessment (2015 GTANA)

One Planet Development

Policy 47	One Planet Development	★
	<p>In addition to satisfying the requirements of national planning policy One Planet Development will be permitted where:</p> <ul style="list-style-type: none">a) the proposal will make a positive social and/or economic contribution with public benefit; andb) the development is of a scale no greater than is necessary to meet the needs of the overall project; andc) opportunities to reuse buildings which are available in the proposal's area of operation have been investigated and shown to be impracticable; andd) the development is well integrated into the landscape and does not have adverse visual effects.	

- 4.313 The elements of local policy for One Planet Development in the Pembrokeshire Coast National Park that are not covered in national policy and guidance are set out above. One Planet Development will need to satisfy both national policy and local planning policy.
- 4.314 With regard to criterion a) in national guidance there is no specific expectation that social and economic benefits will always be provided but there is an expectation that that One Planet Developments should face outwards and engage with local communities. The National Park Authority will expect proof that there is a positive contribution from the development in terms of the environment, the use of resources, and a combination of social/economic benefits will be needed. Public benefits might include providing services to the community. With regard to criterion b) the Authority is keen to ensure that the development does not include non-essential elements e.g. unused poly tunnels or large wind turbines that are superfluous to requirements. With regard to criterion d) Policies 8 and 15 of the Local Development Plan set out the special qualities of the National Park and key considerations that need to be addressed to ensure that those special qualities are not lost to future generations. Policy 33 and its supporting supplementary planning guidance provide

policy and guidance on renewable energy developments. The impact of associated activities such as materials' storage and the impact of lighting (Policy 9) will need to be considered. Supplementary planning guidance drafted under the 1st Local Development Plan for the Pembrokeshire Coast National Park will be updated and taken forward under the replacement Local Development Plan when adopted.

- 4.315 Within the Pembrokeshire Coast National Park it is important that the management plan describes any elements that would be typical of a standard development.
- 4.316 **Options Considered and Preferred Approach:** Two options were considered. Continue with the current Local Development Plan Policy 47 or refine it to exclude national planning policy elements and retain elements that provide unique policy for considering such proposals in a National Park. Both options perform equally in sustainability appraisal terms. The second option, which has been chosen, would fit with national policy advice which asks that national planning policy is not repeated in Local Development Plans.

Priority F: Community Facilities, Retailing, Transport

F. Community Facilities, Retailing, Transport

Community Facilities & Infrastructure

- 4.317 Meeting the local needs of communities means bringing homes, jobs, facilities and services within close reach and supporting existing facilities and services. There is clearly a need to ensure that new development makes services and facilities better for people elsewhere.
- 4.318 The strategy is to ensure that new development does not reduce the existing level and range of provision of community facilities available to Park residents and visitors, unless the facility is no longer required or is not commercially viable, and that, additional infrastructure¹⁹⁹ or services required by a proposal are put in place at the appropriate time. With new and extended facilities they will be encouraged where they are well located to meet the community's needs and convenient to public transport, shops and other services where this is required to serve the needs of the user. The spatial strategy proposed by the Local Development Plan should assist in this aim.
- 4.319 At the end of the Local Development Plan period there will be at least the same number of community facilities as at the beginning of the Local Development Plan period unless loss was unavoidable because they were no longer required. Ensuring quality of provision is not adversely affected will be an important consideration. With regard to criterion 48b) 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 the 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. The Authority proposes to produce supplementary planning guidance to support the application of Policy 48b).
- 4.320 Planning permissions will have secured obligations to deal with the additional infrastructure, services and facilities required by a

¹⁹⁹ See [6. Glossary of Terms](#)

proposal.²⁰⁰ Supplementary Planning Guidance has been prepared under the current Local Development Plan Policy 48c) to explain the requirements for delivering improvements to infrastructure, services and facilities made necessary by the development. This guidance will be taken forward and updated under the replacement Local Development Plan. This Authority will also continue to consider the implications of the possible introduction of the Community Infrastructure Levy in consultation with partner organisations.

4.321 Options Considered and Preferred Approach: Two options were considered regarding planning obligations requirements:

- a) Seek enhancement of community facilities or their provision when required by proposed developments.
- b) Seek enhancement of community facilities or their provision when required by proposed developments. Seek to prioritise benefits to contribute to dealing with the most acute areas of need for National Park communities. When considering the viability of housing proposals affordable housing will be given priority in further negotiations provided that it can be demonstrated that the proposal would not unduly overburden existing community infrastructure (see also Policy 45).

4.322 Local Development Plan Review Report June 2016: The future of the community allocations are being reconsidered as part of the Local Development Plan Revision.

4.323 The second option which is set out in Policy 48 below is the preferred option. The second option allows for prioritisation for areas of acute need where issues arise in terms of the viability of projects.

Policy 48	COMMUNITY FACILITIES & INFRASTRUCTURE REQUIREMENTS (Strategy Policy) ★
	The provision and protection of community facilities ²⁰¹ infrastructure and services will be achieved as follows:
	a) With new and extended facilities these will be

²⁰⁰ Areas where contributions may be sought include, affordable housing, archaeology, nature conservation and the historic environment, community and social services, crime and disorder, education, employment and training, environmental enhancements, flood defence, town centre improvements, fire and rescue infrastructure, health care, libraries, open space, recreation and leisure facilities, recycling facilities and community schemes, transport including travel schemes, allotments and sustainable urban drainage systems.

²⁰¹ See [6. Glossary of Terms](#)

permitted where they are well located to meet the community's needs and they are convenient to public transport, shops and other services where this is required to serve the needs of the user.

- b) Development which would adversely affect the operation of a community facility, or results in its loss will not be permitted except where a suitable replacement or enhanced facility is to be made available or where it can be shown the facility is no longer required or is not commercially viable. When considering a new use for a redundant community facility an employment use or affordable housing will be prioritised (see also Policy 42, Policy 43 and Policy 45).
- 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.

Allocations for community facilities are listed in Table 11 and are shown on the Proposals Map. (To be shown at Deposit Stage (if appropriate))

Policy 48A	Community Facilities Allocations (insert at Deposit stage if appropriate) The following sites are allocated for community facilities:		
Location	Proposals Map ID	Proposal Name	Size

Retail

- 4.324 The strategy for Tenby, Saundersfoot, St Davids and Newport is to maintain their position relative to one another and larger centres outside the area. Despite leaking spend to centres outside the Park area they are performing well with the support of resident and visitor spend. It is proposed to encourage the sympathetic regeneration of these Centres so that they can continue to remain attractive places to live and visit; provide a valuable role in meeting the needs of local communities and visitors, and attract niche retail opportunities.
- 4.325 Towns, in particular those that attract visitors, can become over dominated by non-retailing uses such as takeaways, pubs and restaurants (A3 uses) which make them less attractive for shoppers, and can introduce anti-social behaviour, whilst a diversity of uses such as recreational uses, restaurants, cafes, galleries and cinemas can reduce the need to travel out of a centre. The strategy for the Park will be to maintain areas in Tenby where only a certain proportion of non- retail use will be allowed. Generally amenity issues for A3 uses will be carefully assessed and controlled.
- 4.326 The Authority will resist any proposals which may potentially damage or undermine the retail role of these centres by restricting development outside these centres in accordance with national planning policy.²⁰² The exception to this will be the recognition of the important role rural provision makes to Park communities. Additional provision of retail at these locations is encouraged where compatible with the scale of centre. Outside the main centres other smaller centres can have local shops protected and provided as a community facility by Policy 48.
- 4.327 Options Considered and Preferred Approach: Options considered related to the retention of a primary frontage in Tenby and the approach to take for centre boundaries. [The Background Paper Alternative Options and Appraisal](#) provides further detail regarding how the options performed in terms of the Plan's sustainability objectives and in terms of the soundness tests.
- 4.328 Review Report: Paragraph 62 of the Review Report refers to the need to prepare a Regional Retail Study and to use its findings to

²⁰² There is the potential for out-of-centre development to be in direct competition with, and to undermine centres. [Planning Policy Wales, Edition 9, November 2016](#), July 2016, Chapter 10 advises that retail and other services are best located within existing centres at an appropriate scale. Edge-of-centre or out-of-centre retail developments are considered in [Planning Policy Wales, Edition 9](#), starting at paragraph 10.4.4.

advise on any changes needed to update the Plan's retail policy framework.²⁰³

Policy 49 RETAIL IN THE NATIONAL PARK (Strategy Policy) ★

The retail hierarchy is as follows:

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

All new retail development should be consistent in scale with the size and character of the Centre and its role in the hierarchy.²⁰⁴ Specific areas within Tenby are 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 30).

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

4.329 The policies and advice below provide additional guidance on retail matters.

4.330 Planning Policy Wales, Edition 9, November 2016 sets out clear statements of national development control policy on out of town retailing, amusement centres, farm shops, local shops, village shops and pubs. It also provides advice on factories and other businesses selling produce and retailing at petrol stations. Please refer to Chapter 10 'Planning for Retailing and Town Centres'. Town Centre (Tenby) and District Centre boundaries (Saundersfoot, St Davids and Newport) are identified on the Proposals Map (to be shown at Deposit Stage) along with Primary

²⁰³ South West Wales Regional Retail Study, Ceredigion County Council, Pembrokeshire County Council and Pembrokeshire Coast National Park Authority, February 2017.

²⁰⁴ Planning Policy Wales, Edition 9, November 2016, Chapter 10 identifies examples of the type and scale of development appropriate for town, district, local and village centres (starting paragraph 10.1.2). Technical Advice Note 4 Retail and Commercial Development, November 2016, provides further guidance at paragraphs 4.1 - 4.6.

Retail Frontages at Tenby. There are also smaller centres, including Solva.

Policy 50	Town and District Shopping Centres	★
<p>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:</p>		
<ul style="list-style-type: none">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 generis²⁰⁵ use normally found in such shopping centres;b) if in a smaller centre the proposal is for retail or commercial uses (A1, A2 and A3 uses) or community facilities; andc) if it is located within a primary frontage the proposal would not create a concentration of non-retail uses; andd) the scale, siting and design is appropriate and would contribute to the character and appearance of the area; ande) Proposals for A3 uses would not cause unacceptable disturbance to the occupiers of nearby property or adversely affect amenity (see Policy 30).		

4.331 The policy is intended to ensure that the vitality, viability and diversity of shopping centres is maintained and enhanced. The shopping centres of the Plan area play a vital role in providing services for residents and visitors to the National Park, including leisure, recreation, schools, business and public service offices. Individual businesses benefit from the variety of shops and facilities in the centre as a whole.

4.332 The retention of retailing in Tenby town centre is supported through the definition of primary retail frontages. These are intended to

²⁰⁵ See 6. Glossary of Terms.

ensure that the retailing character and provision of the centre ~~are~~ is not undermined.

4.333 At primary retail frontages, non-A1 uses which would lead to or unacceptably increase the concentration of similar uses, or reduce the retail character of the area will be resisted. Each application will be considered on its individual merits whilst also having regard to the above criteria and national planning policy. However, in most cases a maximum of one-third of the retail frontage in non-A1 use, and no more than three non-A1 units adjacent to each other is considered an appropriate balance of uses.

4.334 Uses which do not attract significant numbers of customers will be encouraged to locate above the ground floor level at retail frontage locations. In appropriate cases, ground floor occupiers will be required to maintain a shopfront and window display. Residential development above ground level will be considered appropriate.

4.335 Most non retail uses add to the vitality and attractiveness of centres, however a concentration of A3 (hot food and drink) uses such as take-aways can affect the attractiveness and amenity of the centre and limit use to certain times of the day.

4.336 Appropriate conditions will be applied to ensure that amenity is not adversely affected including restriction on the hours of opening, provision of appropriate litterbins and filtration (odour) equipment. Contributions may also be required to support public safety measures.

Policy 51 Garden Centres

Garden centres will be permitted where:

- a) the proposal is located within or adjacent to a Centre; and
- b) the proposal would not undermine the vitality and viability of retail facilities in any nearby Centre; and
- c) the scale and nature of any buildings proposed for retail use and the size, design, materials and siting of any new building or extension blend with existing building(s).

4.337 Garden centres are a distinctive element of the retailing facilities of the County. This policy is intended to ensure that retail garden centres or plant nurseries which sell to the visiting public are well located in terms of existing Local Development Plan Centres and

developments, and are of an appropriate scale for the location. In many cases, the impact on local amenity and traffic issues can be an important consideration.

4.338 Planning conditions may be applied to limit the range of goods which can be sold from the premises and to ensure that the net retailing floorspace is appropriate, so as to protect the vitality and viability of existing centres and particularly local shops.

Sustainable Transport

4.339 The strategy for the National Park is to improve accessibility²⁰⁶ and promote it by appropriate means for the people who work, live, rest and play in the National Park whilst reducing the need to travel by private car.

4.340 As the National Park is not a highways authority much of the strategy will be delivered through the policies and actions of other plans produced by the Welsh Assembly Government, and Pembrokeshire County Council Highways Authority. The Joint Transport Plan for South West Wales and the Local Transport Plan Programme sets out the priorities for improving transport and accessibility in the area.

4.341 The spatial strategy of the Local Development Plan is to target development wherever possible to locations which have a reasonable range of facilities and access by public transport, although it is acknowledged that the National Park is predominantly rural in nature and some Centres that have a range of facilities and should be encouraged to grow, fall short on public transport provision, with little prospect for increased bus services. The services and facilities available however may help to reduce the number and length of journeys made.

4.342 Although the Local Development Plan's strategy directs growth primarily to Centres, there are instances where the Local Development Plan will need to consider proposals outside these locations, for example, to help economic diversification in the countryside. The strategy will be to assess proposals in terms of the traffic impact and to avoid those that cause significant concerns. Examples of this might be by generating significant levels of traffic in congested areas or where there are concerns over damage to the character of the local area and these impacts cannot be mitigated.

4.343 Local Development Plan Review Report June 2016: Road and Cycle Schemes identified in the adopted Local Development Plan require reviewing.

²⁰⁶ See [6. Glossary of Terms](#).

Policy 52

SUSTAINABLE TRANSPORT (Strategy Policy)

To ensure that opportunities are taken to improve and promote sustainable travel choices 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 pedestrians, cyclists, vehicles; and
- d) Not permitting proposals that cause significant concerns about potential transport impacts which cannot be satisfactorily mitigated (see Policy 53).

Allocations for road and cycle schemes are listed in Policy 52A and shown on the Proposals Map (to be shown at Deposit Stage).

4.344 Land affected by the following Welsh Government and County Council road and cycle schemes are safeguarded from other developments that would be likely to prejudice their implementation.²⁰⁷ The proposed route, where known is shown on the Proposals Map (to be shown at Deposit Stage).

Policy 52A	Road and Cycle Schemes (to be added at Deposit Stage) The following schemes are safeguarded and shown on the Proposals Map	
Location	Proposals Map ID	Scheme Name

4.345 Planning Policy Wales, Edition 9, November 2016 sets out clear statements of national development control policy on traffic management, transport considerations in development control, transport assessments and travel plans and access to development. Planning and appraisal of transport proposals in Wales are guided

²⁰⁷ See 6. Glossary of Terms

by the Welsh Government's (WelTAG) Welsh Transport Planning and Appraisal Guidance which details how all transport proposals should be planned and developed. The policies below provide additional guidance and advice on sustainable transport.

Policy 53 Impacts of Traffic

Development will not be permitted where:

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

A Transport Assessment²⁰⁸ will be required for proposals likely to have significant trip generation or where the National Park Authority has significant concerns about the possible transport impact of the proposed development.

4.346 This policy follows the National Planning Policy set out in Technical Advice Note 18 and sets out criteria for assessment of all relevant proposals.

4.347 A Transport Assessment²⁰⁹ will be required for proposals likely to have significant trip generation :

- a) Residential developments of 25 units or more: or
- b) 100 or more vehicle movements per day: or
- c) 10 freight movements per day: or

²⁰⁸ [See Glossary of Terms.](#)

²⁰⁹ [See 6. Glossary of Terms.](#)

In addition if the National Park Authority has significant concerns about the possible transport impact of the proposed development a Transport Assessment will be required.

4.348 With regard to criterion f) a significant challenge will be to facilitate parking provision that adequately serves the rural hinterland, maintains the vitality and viability of the Centre while at the same time avoiding undermining both the ability to provide public transport and the incentive to walk and cycle within the Centre.

4.349 The Authority has adopted supplementary planning guidance on Parking Standards which will be taken forward and reviewed under the replacement Local Development Plan.

Policy 54 Cycleways

New cycleways will be permitted where they:

- a) have as little adverse environmental impact as feasible, and where necessary incorporate mitigation measures; and
- b) fulfil a strategic or local need (for instance forming part of or a link to the National Cycle Network); or
- c) contribute to road safety improvements (separation of cycle traffic from motor vehicles for example); or
- d) provide improved opportunities for sustainable travel (particularly within or between the main Centres and large Centres of the County and also to and from major tourist attractions); or
- e) reduce traffic congestion in an historic Centre, at a rural/coastal attraction, or at schools and along well used routes to and from them.

4.350 The purpose of this policy is to support the development of cycleways. Like walking, cycling is a flexible and convenient travel mode, particularly for shorter distance journeys.

Utility Services

4.351 Planning Policy Wales, Edition 9, November 2016 sets out clear statements of national development control policy on water supply and quality and waste water management. Please refer to Chapter

Policy 55 Powerlines and Pipelines

Cables or pipelines and associated development will be permitted where the least obtrusive and damaging location, route or means of provision is chosen. Where developments would be visually prominent evidence must be provided to show that alternative locations have been investigated and are impractical. Such proposals will be rigorously examined with regard to siting and design and will be permitted only where there are no unacceptably adverse effects on the special qualities of the National Park.

Where it can be demonstrated that proposals are of national significance, applications should be accompanied by technical and financial feasibility studies.

4.352 The purpose of this policy is to set out an appropriate framework for considering proposals for cabling, the construction of pipelines and associated development such as pylons, substations etc. Opportunities for undergrounding should always be explored providing that this does not result in a greater impact on the National Park's special qualities. It is acknowledged that the location or route chosen must be technically feasible. The National Park's special qualities are defined in Policy 8.

4.353 Many proposals will lie outside the scope of normal planning control with the National Park Authority only being consulted by the relevant statutory body. Therefore the Authority will, in addition to using this policy in dealing with planning applications received for such proposals, use it in informing responses to such consultations.

4.354 Policy 33 is also relevant for renewable energy proposals.

Policy 56 Telecommunications

Telecommunications development will be permitted provided that:

a) the development is part of a planned system of provision; and

b) taking account of opportunities afforded by the

shared use of existing masts, antenna or other structures, the least obtrusive or damaging, technically-feasible structure and location can be secured.

Where developments would be visually prominent evidence must be provided to show that alternative locations have been investigated and are impractical. Such proposals will be rigorously examined with regard to siting and design and will be permitted only where there are no unacceptably adverse effects on the special qualities of the National Park.

Where it can be demonstrated that proposals are of national significance, applications should be accompanied by technical and financial feasibility studies.

4.355 This policy is intended to guide telecommunications developments to the least obtrusive location possible, taking into account the technical requirement of each individual application, including its function within the network. Both the individual and cumulative impact of proposals will be of importance. The planned system of provision should include a strategic programme for the location of masts showing how the proposal fits into the network. To assess the proposal under criterion b) applicants will also be required to demonstrate that an appraisal of alternative sites and options has been undertaken, taking into account the possibilities of mast sharing, attachment to a building or other suitable structure when providing a justification for the preferred site. The Authority will expect the information to clearly demonstrate in quantifiable terms why alternative locations or options are impractical relative to the site chosen.

4.356 The effect of telecommunications developments on amenity is an important consideration (see Policy 30).

4.357 The National Park's special qualities are defined in Policy 8. There is a potential for negative impacts on species, (e.g. bats), however a determination of effect cannot be made without the scale and location of the development being known. Consideration of environmental impacts will include designated sites, such as Natura 2000 sites and undesignated sites.

5. Monitoring

- 5.1 The proposals of the Local Development Plan represent a change in the scale, location and type of development proposed in the National Park. The effort required to achieve key outcomes of the Plan extends beyond the responsibilities and resources of the National Park Authority, for instance in relation to the provision of sewage treatment facilities or infrastructure to support the release of new employment sites.
- 5.2 The Local Development Plan's objectives and policies will be monitored through an Annual Monitoring Report.²¹⁰ These reports will monitor progress against key indicators²¹¹ and targets. The report will reflect the success of the Local Development Plan and show if targets are being met. These indicators and targets are in addition to those which are to be used in the Sustainability Appraisal monitoring.
- 5.3 In the Annual Monitoring Reports²¹² the following areas will be covered:
- a) Key Findings and recommendations
 - b) Significant contextual change
 - c) Policy monitoring
- 5.4 The analysis will be grouped under the overarching National Park Purposes and Duty (and spatial strategy) and then the six key priority areas:
- a) Special qualities
 - b) Major development, the potential for growth
 - c) Climate change, sustainable design, flooding, sustainable energy
 - d) Visitor economy, employment, and rural diversification
 - e) Affordable housing and housing growth
 - f) Community facilities, retailing, transport
- 5.5 First the key outcomes anticipated will be listed under each priority area, and then any significant contextual changes during the year will be analysed. The aim of the monitoring framework (set out below) will be to assess the extent to which policies are being implemented as intended, and whether objectives are being achieved.
- 5.6 Triggers are included within the policy analysis to ensure that a detailed investigation is undertaken of the effectiveness of the policy when the trigger is met. Any recommendations for a review of the

²¹⁰ See 6. Glossary of Terms.

²¹¹ See 6. Glossary of Terms

²¹² See 6. Glossary of Terms

policies or Plan as a result of the detailed assessment will be set out in the Annual Monitoring Report.

5.7 The Annual Monitoring Report will also include an analysis of the effectiveness of policies and Supplementary Planning Guidance when dealing with Appeals. The Annual Monitoring Report will also contain a section on Sustainability Appraisal monitoring and a section which monitors progress with site specific allocations. Any actions needed to address issues will also be set out.

National Park Purposes and Duty and the Spatial Strategy

Policy Area	Indicator 1.	Target
All	Approvals contrary to recommendation.	0 approvals contrary to recommendation.
<p>Trigger: 3% of planning applications²¹³ decided contrary to recommendation in any one year.</p> <p>Reason: To identify patterns over the Annual Monitoring Report period.</p>		

Policy Area	Indicator 2.	Target
National Park Purposes & Duty	Developments which engage the Sandford Principle – where conflict between the two National Park purposes becomes irreconcilable, the first one must prevail. Carrying out the socio-economic duty in National Parks must be in pursuance of the purposes to Policy 1 (overarching indicator).	Target - 0 approvals within or impacting on the National Park which breach the Sandford principle or which result in conflicts between the duty and purposes. (overarching target)
<p>Trigger: 0 applications approved contrary to the Sandford Principle in any one year.</p> <p>Reason: The Sandford Principle is a central component of the National Park purposes and 1995 Environment Act.</p>		

Policy Area	Indicator 3.	Target

²¹³ Full, outline or reserved matters applications.

Policy 37	Prioritising affordable housing over self-catering	Target - 0 approvals contrary to policies that prioritise certain uses seen to sustain communities in the Plan.
<p>Trigger: Approval of 2 or more applications contrary to policy 37 in any one year.</p> <p>Reason: This policy provides a windfall opportunity for affordable housing and with limited land available for development early scrutiny of the policy is appropriate.</p>		

Policy Area	Indicator 4.	Target
Policy 42, 43, 45 & 48	Policy 42, 43, 45 & 48 - Prioritise community uses when redeveloping sites.	0 approvals contrary to policies.
<p>Trigger: Approval of 2 or more planning applications contrary to the Policy 42, 43, 45 or 48 in any one year.</p> <p>Reason: The National Park does not contain many sites used for employment or community facilities and any loss to other uses must continue to support the local community. They are valuable to individual communities and a stringent threshold is appropriate.</p>		

Policy Area	Indicator 5.	Target
Policy 48	Community Facilities & Infrastructure Requirements.	0 approvals contrary to policies seen to protect and provide for community facilities and infrastructure
<p>Trigger: Approval of 1 or more planning applications contrary to the Policy 48 in any one year.</p> <p>Reason: Any loss that is not justified as required by Policy 48 needs to be investigated. They are valuable to individual communities and a stringent threshold is appropriate.</p>		

2A Special Qualities

Policy Area	Indicator 6.	Target
Policy 8 (Strategy Policy)	Approvals contrary to Strategy Policy 8 Special Qualities. Approvals contrary to Recommendation.	0 approvals
<p>Trigger: 2 developments permitted contrary to any criterion in any one year.</p> <p>Reason: The Special Qualities are central to National Park Purposes set out in the Environment Act 1995.</p>		

Policy Area	Indicator 7.	Target
Welsh Language Policy 12	Proposals contrary to Policy 12	0 approvals
<p>Trigger: 2 or more developments contrary to the Policy 12.</p> <p>Reason: To ensure consistency of approach with national planning guidance.</p>		

Policy Area	Indicator 8.	Target
Landscape & Seascape Policy 15	Proposals contrary to Policy 15	0 approvals
<p>Trigger: 2 or more developments contrary to the Policy 15 and its supporting supplementary planning guidance.</p> <p>Reason: The Special Qualities (Environment Act 1995) of the National Park could be significantly affected by such development.</p>		

2B Major development, the potential for growth

Policy Area	Indicator 9.	Target
Major development	Approvals of proposals that engage Major Development Test	0 approval of major development unless exceptional circumstances are proven.
<p>Trigger: Approval of 1 major development where no exceptional circumstances are shown in any one year.</p> <p>Reason: To ensure a consistent approach with first purpose and Planning Policy Wales Major Development test.</p>		

Policy Area	Indicator 10.	Target
Minerals	Applications for minerals development	0 approval for new minerals development unless exceptional circumstances are proven.
<p>Trigger: 1 new or extended mineral site permitted when exceptional circumstances are not shown in any one year.</p> <p>Reason: This would have a major impact on the minerals strategy. The trigger would not include borrow pits.</p>		

2C Climate change, sustainable design, renewable energy, flooding

Policy Area	Indicator 11.	Target
Sustainable Design Policy 29	Approvals contrary to Strategy Policy 29 'Sustainable Design' on the grounds of criterion c), e), g), h) or i).	0 approvals.
<p>Trigger: 3 or more decisions contrary to Policy 29</p> <p>Reason: To monitor the Plan's contribution to sustainable design in all development.</p>		

Policy Area		Indicator 12.	Target
Renewable Energy Policy 33		Capacity of renewable energy schemes permitted and completed.	<p>Planning permissions to contribute to an overall Renewable Electricity Target for the National Park of 38.9GWh.</p> <p>This target is aspirational, dependent upon a range of factors in the future such as government changes in policy, funding opportunities/constraints, as well as other external factors.</p>

Policy Area		Indicator 13.	Target
Renewable Energy Policy 33		As above for Indicator 11	<p>Planning permissions to contribute to an overall Renewable Heat Target for the National Park of 9.8 GWh.</p> <p>This target is aspirational, dependent upon a range of factors in the future such as government changes in policy, funding opportunities/constraints, as well as other external factors.</p>

Policy Area		Indicator 14.	Target
Renewable Energy Policy 33		Renewable Energy Supplementary Planning Guidance and Cumulative Impact of Wind Turbines on Landscape and Visual Amenity Supplementary Planning Guidance	All decision making is consistent with the Authority's Renewable Energy Supplementary Planning Guidance and Cumulative Impact of Wind Turbines on Landscape and Visual Amenity Supplementary Planning Guidance

Trigger: 3 or more decisions contrary to the principles set out within the Renewable Energy supplementary planning guidance.

Reason: Although the contribution provided by renewables is important it is difficult to monitor (see above). A more meaningful measure is how effective the Renewable Energy Supplementary Planning Guidance will be (adopted October 2011) and will be taken forward and updated under the replacement Local Development Plan) in providing a supportive context for renewables provision while protecting the special qualities of the National Park. Deciding applications contrary to this Supplementary Planning Guidance

Policy Area		Indicator 14.	Target
should trigger a review.			

Policy Area		Indicator 15.	Target
Flooding Policy 34		Amount of development (by TAN 15 paragraph 5.1 development category) permitted in C1 and C2 floodplain areas not meeting all TAN 15 tests (paragraph 6.2 i-v)	Development is not permitted where the long term scenario (in the next 60 years) would fail the tests set out in Indicator 13.
Trigger: 1 development permitted contrary to Policy 34.			
Reason: Can be severe consequences of inappropriate development. This is a Welsh Government indicator.			

2D Visitor economy, employment and rural diversification

Policy Area		Indicator 16.	Target
Policy 48		Loss of employment sites	0 approvals of loss of employment sites except where justified within the terms of the policy.
Trigger: Loss of two or more employment sites or 500 sq. metres contrary to recommendation.			
Reason: Small employment sites can make an important contribution to sustainable communities.			

Policy Area		Indicator 17.	Target
Hotel Accommodation Policy 36		Hotels	Maintain except where loss of hotel proven.
Trigger: 1 or more developments contrary to recommendation in any one financial year.			

Reason: The impact of such development changes on National Park purposes. There is a need to maintain current provision unless loss is justified.

Policy Area		Indicator 18.	Target
Caravan & Camping Policy 38A		Proposals contrary to Policy 38A.	0 approvals
<p>Trigger: 2 or more developments contrary to the Policy 38A and its supporting supplementary planning guidance.</p> <p>Reason: The Special Qualities (Environment Act 1995) of the National Park could be significantly affected by such development.</p>			

Policy Area		Indicator 19.	Target
Special Qualities Policy 8		Proposals for recreational activity contrary to Policy 8.	0 approvals
<p>Trigger: 2 or more recreational activity developments contrary to the Recreational Activities Supplementary Planning Guidance</p> <p>Reason: The special qualities (Environment Act 1995) could be significantly affected by such development.</p>			

2E Affordable housing and housing growth

Policy Area		Indicator 20.	Target
Housing		The housing land supply taken from the current Housing Land Availability Study (TAN1)	Minimum 5 years supply.
<p>Trigger: Less than a 5 year supply in any one year.</p> <p>Reason: It is important to deliver the affordable housing strategy.</p>			

Policy Area		Indicator 21.	Target
Housing		The number of net additional affordable and general market dwellings built (TAN 2).	<p>XXX affordable dwellings built over the Plan period.</p> <p>XXX general market dwellings built over the Plan period.</p> <p>Await Deposit Plan</p>
<p>Trigger: xx% below the target expected by the formal Plan review period – see Table x.</p> <p>Reason: The delivery of affordable housing is a key outcome of the Plan. To allow land an opportunity to come forward means an assessment at this stage would be inappropriate.</p>			

Policy Area		Indicator 22.	Target
Housing		The affordable housing target in key outcome a) and the target and in Policy 45.	Target will reflect economic circumstances.
<p>Trigger: See paragraphs x to y of the reasoned justification of Policy 45. An analysis will be undertaken for each Local Development Plan Annual Monitoring Report.</p> <p>Reason: The delivery of affordable housing is a key outcome of the Plan but must take account of economic circumstances.</p>			

Policy Area		Indicator 23.	Target
Allocation Sites Tables		Total housing units permitted on allocated sites as a % of overall housing provision	<p>Allocations – xxx % permitted by xxx</p> <p>Await Deposit Plan draft.</p>
<p>Trigger: xx % below the target expected by the formal Plan review period. See Table x</p> <p>Reason: To allow land an opportunity to come forward means an assessment at this stage would be inappropriate.</p>			

Policy Area		Indicator 24.	Target
Policy 46 Gypsy and Traveller Sites		Proposals for Gypsy Traveller Sites contrary to Officer recommendation.	Authority decisions are consistent with Policy
<p>Trigger: 1 or more applications are approved contrary to recommendation.</p> <p>Reason: To analyse the effectiveness of the Policy.</p>			

Policy Area		Indicator 25.	Target
Employment Allocation Sites Tables		Employment land permitted (ha) on allocated sites as a % of all employment allocations	Allocations – xxx % permitted by xxx Await Deposit Plan draft. Allocations unlikely
<p>Trigger: xx% below the target expected by the formal Plan review period.</p> <p>Reason: To allow land an opportunity to come forward means an assessment at this stage would be inappropriate.</p>			

Policy Area		Indicator 26.	Target
Retail etc.		Amount of major retail, office and leisure development (sq m) permitted within and outside established town and district centre boundaries	xxx % permitted by xxx Await Deposit Plan draft. Allocations unlikely

Trigger: xx% below the target expected by the formal Plan review period.

Reason: To allow land an opportunity to come forward means an assessment at this stage would be in appropriate.

Policy Area		Indicator 27.	Target
Policy 44		Average density of housing development permitted on allocated Development Plan sites.	30 per hectare target in the Plan Centres achieved.

Trigger: 2 or more housing developments not achieving 30 dwellings to the hectare on allocated sites.

Reason: To make the best use of available land.

2F Community Facilities, Retailing and Transport

Policy Area		Indicator 28.	Target
Policy 48		Number of Planning Obligations for community facilities secured from development (or financial contributions).	S106 agreements secured in line with Supplementary Planning Guidance

Trigger: More than 2 applications decided contrary to the recommendation.

Reason: To secure improvement in community facility provision where the requirement arises from the development.

Policy Area		Indicator 29.	Target
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Countryside and Policy 16		Amount of greenfield and open space lost to development (ha) which is not allocated (for other purposes) in the Plan.	Greenfield - 0 % except for exceptional land released for affordable housing or community facility provision.
		Amount of Green Wedge lost.	Open Space lost - 0 % except where, with playing fields, facilities can be best retained and enhanced through the redevelopment of a small part of the site or alternative provision can be made of equivalent benefit or there is excess provision in the area.
			Green Wedge – 0% lost

Trigger: 1 or more inappropriate developments granted permission contrary to recommendation in any one year.

Reason: The cumulative loss of green field land should be assessed to ensure that opportunities for brownfield development are not being overlooked.

The loss of open space unless justified leads to the undermining of the sustainability of local communities.

Local planning authorities should attach substantial weight to any harmful impact which a development would have on a green wedge.

Policy Area		Indicator 30.	Target
Retail Policy 48		Percentage of vacant retail floor space.	No greater than 10%.

Trigger: Greater than 10% vacant A use class floor space within retail centres for 2 consecutive years.

Reason: Vacancy in centres naturally fluctuates and allows for new ventures to come forward. Sustained relatively high vacancy for National Park centres should be assessed further.

Policy Area		Indicator 31.	Target
Transport Policy 52		Approvals for development without providing appropriate access for vehicles, cyclists	0

		and pedestrians.	
<p>Trigger: 1 or more developments approved contrary to Policy 52 recommendation in any one year.</p> <p>Reason: Appropriate access provision is essential for developments to go ahead.</p>			

Policy Area	Indicator 32.	Target
Transport Policy 52	Approvals for development causing significant concerns regarding potential transport impacts.	0
<p>Trigger: 1 or more applications approved contrary to recommendation.</p> <p>Reason: Significant concerns will impact on communities and will require further assessment.</p>		

6. Glossary of Terms

Term Used	Explanation
Accessibility	The extent to which a property, locality or facility is readily approachable and usable by as many people as possible, including individuals with disabilities.
Adopted	The final confirmation of the Plan or Supplementary Planning Guidance or Strategy.
Affordable housing	Affordable housing is housing for sale or rent at prices below the market rate. It will be reserved in perpetuity by the use of Section 106 agreements or conditions as affordable housing where a private developer is involved. Housing Associations will not be required to enter into such obligations but may wish to enter into voluntary lettings agreements. Affordable housing will be provided for local people in unsuitable housing who cannot afford to resolve their housing needs in the open market.
Affordable Housing Need	Assessed by examining the suitability of present housing and the ability of households to afford market priced housing.
Allocation	Land which will be proposed for development, which will be identified in a Proposals Map in the Deposit and the Adopted versions of the Local Development Plan.
Annual Monitoring Report (AMR)	This will assess the extent to which policies in the Local Development Plan are being successfully implemented.
BREEAM	The BREEAM family of assessment methods and tools are all designed to help construction professionals understand and mitigate the environmental impacts of the developments they design and build.
Brownfield Site/ Land (Previously Developed land)	See Planning Policy Wales Edition 9 (2016), Figure 4.4
Candidate Site	Candidate Sites are those nominated by anyone for consideration by the local planning authority as allocations in the Local Development Plan.
Candidate Site Register	Register of candidate sites prepared following a call for candidate sites by the local planning authority.
'Centre'	Means either a 'Local Service and Tourism Centre' or a 'Local Centre' or a 'Rural Centre'.
Community Facilities	Community facilities provide for the health, welfare, social, educational, spiritual, leisure and cultural needs of the community. Facilities are usually located within a village or town that is regularly used by the local community. These can include; shops, public houses, cinemas, petrol filling stations, children's formal play areas, playing fields, doctor's surgery, schools, village/community halls, nursing homes, churches,

Term Used	Explanation
	allotments, etc.,
Conserve	To keep from harm, decay or loss.
Consultation	A formal process in which comments are invited on a particular topic or set of topics, or a draft document.
Cultural Heritage	The cultural heritage of Pembrokeshire Coast National Park includes all evidence of past human activity, as well as people's responses to, and associations with those activities. It includes the aesthetic appreciation as well as the physical evidence of people's activities, and is embodied in language, art, and the meaning and interpretation which we give to our landscape and historic environment. It is all around us, providing a context for our daily lives and influencing regional and local identity.
Delivery Agreement	A document comprising the Local Planning Authority's timetable for the preparation of the Local Development Plan together with its Community Involvement Scheme, submitted to the Welsh Government for agreement.
Deliverability	Where a site is realistically expected to be developed in the Plan period. It is important to be able to demonstrate that there are no fundamental impediments to the development of the sites allocated in the Plan and to be able to specify the timescales within which constraints will be overcome.
Deposit Plan	A formal stage during which organisations and individuals can make representations on the detailed policies and proposals.
Employment Land / Site	Land that typically forms part of an industrial estate or business park, which is occupied by one or more of the following: offices, manufacturing, research and development, storage and distribution.
Enhance	To improve, heighten or intensify.
Evidence	Base Interpretation of the present state of an area (i.e. baseline) or other information/ data to provide the basis for planning policy and against which to measure change.
Greenfield Sites	These are sites which have never been previously developed or used for an urban use, or are on land that has been brought into active or beneficial use for agriculture or forestry i.e. fully restored derelict land.
Greenways	Pembrokeshire Greenways is a partnership initiative to promote access and enjoyment for all by bus and train travel, walking, cycling, and horse riding rather than by the use of the private car. It comprises public and community bodies involved with the promotion and delivery of sustainable travel in Pembrokeshire and includes the National Park Authority, Pembrokeshire County Council, Natural Resources Wales, Public Health Wales, Pembrokeshire Tourism,

Term Used	Explanation
	Pembrokeshire Access Group and Sustrans.
Historic Environment	The historic environment of the Pembrokeshire Coast National Park encompasses all those material remains that our ancestors have created on land and coast. It ranges from historic landscapes, parks and gardens, distinctive field patterns and thoroughfares through to historic settlements, traditional buildings, ancient monuments and buried archaeological sites. It provides a constant reminder of past human enterprise, a source of enjoyment and learning and combines with the natural environment and habitats of the National Park to give us a unique sense of place, daily inspiration and an important asset for the future.
Implementation	Implementation is the carrying out, execution, or practice of a plan, a method, or any design for doing something. As such, implementation is the action that must follow any preliminary thinking in order for something to actually happen.
Indicator	An indicator is something that helps you understand where you are, which way you are going and how far you are from where you want to be. A good indicator alerts you to a problem before it gets too bad and helps you recognise what needs to be done to fix the problem.
Infrastructure	Water supply and sewerage facilities, roads and transportation, local community, shopping and other facilities required as framework for development.
Landscape Capacity	The ability of the National Park landscape to absorb development for this Plan period is tested using the methodology set out in the Background Paper 'Candidate Site Assessment Methodology'.
Landscape Sensitivity Assessment	Advises on the sensitivity of landscape areas to different scales of development.
Local Development Plan (LDP)	The required statutory development plan for each local planning authority area in Wales under Part 6 of the Planning and Compulsory Purchase Act 2004. The Local Planning Authorities (LPAs) have to set out their objectives in relation to development and use of land in their area and set out the general policies for the implementation of those objectives within their Local Development Plans. As well as having regard to national planning policy, the Local Planning Authority has to take into account of regional planning policy and the authority's community strategy and the social, economic and environmental factors relating to the local area and global environment, by undertaking a sustainability appraisal of the Local Development Plan.
Local Wellbeing Plans	Under The Well-being of Future Generations (Wales) Act 2015 Public Service Boards will be established for each local authority area; it is intended that each will prepare a Well-being Plan by April 2018 (s.39).

Term Used	Explanation
Marine Conservation Zone	An area of national or international importance for the purpose of conserving especially important marine habitats and wildlife and other features along the foreshore and seabed.
Mitigation	Measures that avoid, reduce, remediate or compensate for the negative impacts of a strategic action.
Natura 2000 Sites	<p>Natura 2000 is a European network of protected sites which represent areas of the highest value for natural habitats and species of plants and animals which are rare, endangered or vulnerable in the European Community.</p> <p>The Natura 2000 network includes two types of area. Areas may be designated as Special Areas of Conservation (SAC) where they support rare, endangered or vulnerable natural habitats and species of plants or animals (other than birds). Where areas support significant numbers of wild birds and their habitats, they may become Special Protection Areas (SPA). SACs are designated under the Habitats Directive and SPAs are classified under the Birds Directive. Some very important areas may become both SAC and SPA.</p>
Single Integrated Plan	Discharges statutory duties identified by Welsh Government (“Shared Purpose – Shared Delivery”, WG 2012), including Community Strategies; prepared by a Local Service Board. See “Local Well-being Plans” which are to replace SIPs”.
Site of Special Scientific Interest (SSSI)	A conservation designation denoting a protected area in the United Kingdom. SSSIs are the basic ‘building block’ of nature conservation legislation, and most other legal nature/geological conservation designations are based upon them, including National Nature Reserves, Ramsar Sites, Special Protection Areas, and Special Areas of Conservation.
Special Area of Conservation(SAC)	Designated under the European Directive on the Conservation of Natural Habitats and Wild Flora and Fauna for the conservation of sites of international conservation importance.
Special Protection Area (SPA)	Designated under the European Directive on the Conservation of Wild Birds for the protection of wild birds and their habitats.
Soundness	A concept comprising procedure, consistency, coherence and effectiveness against which a local development plan will be examined by an independent Planning Inspector.
Stakeholders	Interests directly affected by the Local Development Plan – involvement generally through representative bodies.

Term Used	Explanation
Statement of Common Ground	The purpose of a Statement of Common Ground is to establish the main areas of agreement between two or more parties on a particular issue.
Strategic Environmental Assessment (SEA)	Generic term used internationally to describe environmental assessment as applied to policies, plans and programmes.
Strategy	A strategy is a long term plan or method designed to achieve a particular goal or objective.
Supplementary Planning Guidance (SPG)	Supplementary information in respect of the policies in a Local Development Plan. Supplementary Planning Guidance does not form part of the Development Plan and is not subject to independent examination but must be consistent with the Plan and with national policy.
Sustainability Appraisal	A Sustainability Appraisal is an appraisal of the economic, environmental, and social effects of a plan from the outset of the preparation process to allow decisions to be made that accord with sustainable development.
Sustainable Development	<p>“Sustainable development” means the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals.</p> <p>Acting in accordance with the sustainable development principle means that a body must act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs.</p>
Trajectory (Housing)	For market and affordable housing, illustrates the expected rate of housing delivery.
Transport Assessment	These provide the information necessary to assess the suitability of an application in terms of travel demand and impact. The assessment should set objectives and targets relating to managing travel demand for the development and set out the infrastructure, demand management measures and financial contributions necessary to achieve them. (See Technical Advice Note 18: Transport (March 2007) for further information).
Utilities	Services provided such as water supply, sewerage, gas and electricity.
Use Class Order	Class A1 SHOPS of all types including superstores and retail warehouses; also includes hairdressers, sandwich bars (except those selling hot food), travel agents, launderettes, dry cleaners, showrooms, except car showrooms.
	Class A2 FINANCIAL AND PROFESSIONAL SERVICES to visiting members of the public,

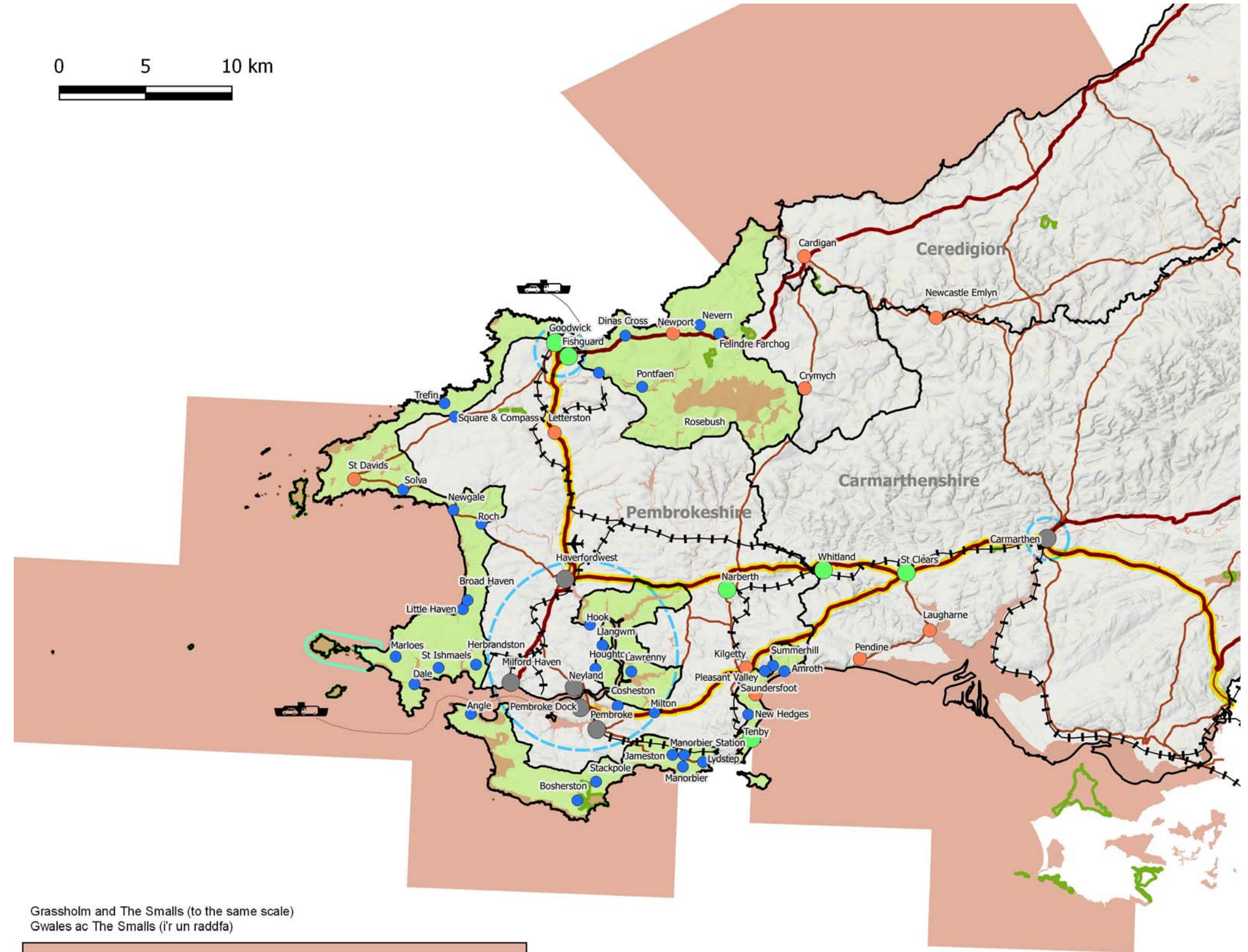
Term Used	Explanation
	including banks, building societies, estate agents, betting offices.
	Class A3 FOOD AND DRINK including restaurants, pubs, wine bars, and take-aways.
	Class B1 BUSINESS USE including offices (other than those falling in Class A2), research and development, and industrial processes, provided the use could be carried out in any residential area without detriment to amenity by reason of noise, vibration, smell, fumes, smoke, soot, ash, dust or grit.
	Class B2 GENERAL INDUSTRIAL process other than one falling into Class B1.
	Class B8 STORAGE AND DISTRIBUTION warehouses including wholesale cash and carry.
	Class C1 HOTELS
	Class C2 RESIDENTIAL INSTITUTIONS including hospitals, nursing homes, residential schools and colleges.
	Class D1 NON - RESIDENTIAL INSTITUTIONS including religious buildings, public halls, museums, medical services.
	Class D2 ASSEMBLY AND LEISURE including cinemas, bingo halls, casinos and indoor sports.
	SUI GENERIS Many uses do not fall within any Use Class and are therefore described as <i>Sui generis</i> - a class on their own. For example, theatres, amusement centres, car showrooms, petrol filling stations, and car hire offices are among uses which are specifically excluded from any of the defined Classes.
Wales Spatial Plan (WSP)	A plan prepared and approved by the National Assembly for Wales which sets out a strategic framework to guide future development and policy interventions, whether or not these relate to formal land use planning control. Local development plans must have regard to the Wales Spatial Plan.
Waste Management Facilities	Facilities for storing, sorting, treating and disposing or waste. They include, for example, Household Recycling Centres, waste transfer stations, landfill sites, composting facilities and various methods of recovering energy.
Windfall	The term 'windfall sites' is used to refer to those sites which become available for development unexpectedly and are therefore not included as allocated land in a planning authority's development plan. For example, a bus depot may shut down or an industrial site become vacant which may provide a suitable location for housing.

Appendix 1 Allocations – to be inserted at Deposit Stage

Key Diagram / Diagram Allweddol

-  Main Settlement/
Prif Aneddiadau
-  Local Service & Tourism Centre/
Canolfan Wasanaeth a Thwristiaeth Leol
-  Local Centre/
Canolfan Leol
-  Rural Centre/
Canolfan Gwledig
-  A Road / Ffyrdd 'A'
-  Trunk Road / Rhydwaith o Brif Ffyrdd
-  Trans-European Road Network /
Rhydwaith o Ffyrdd Traws-Ewropeaidd
-  Railway / Rheilffordd
-  Airfield / Maes Awyr
-  Ferry (Rosslare, Ireland) /
Fferi (Rosslare, Iwerddon)
-  National Nature Reserve /
Gwarchodfa Natur Forol
-  Marine Conservation Zone /
Parthau Cadwraeth Morol
-  Neighbouring Planning Authority Area /
Ardal Awdurdod Cynllunio Cyfagos
-  Natura 2000 site/
Safleoedd Bywyd Gwyllt Rhyngwladol
-  Pembrokeshire Coast National Park /
Parc Cenedlaethol Arfordir Penfro
-  Wales Spatial Plan Strategic Hub /
Cynllun Gofodol Cymru - Canolfan Strategol

0 5 10 km



Grassholm and The Smalls (to the same scale)
Gwales ac The Smalls (i'r un raddfa)



Pembrokeshire Coast National Park

Replacement Local Development Plan (end date-2031)

Preferred Strategy

Draft Initial Sustainability Appraisal
Non-technical Summary

PEMBROKESHIRE COAST NATIONAL PARK AUTHORITY

NPA 17th May 2017

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. The 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 Replacement Local Development Plan Preferred Strategy, in accordance with guidance from the Welsh 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. Locate developments so as to minimise the demand for travel, especially by private car.
- 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 of the Draft Initial Sustainability Appraisal Report.

What would happen in the absence of the Local Development Plan

1.4 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.

1.5 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 Adopted Local Development Plan, though as this Plan moves towards and passes its end date (2021), it is likely to become less relevant and useful, and decisions will need to be made according to National policy only (see Section 4, page 21 of the Draft Initial Sustainability Appraisal Report for the predicted sustainability effects).

Appraisal of Local Development Plan Objectives, Policies and candidate sites

1.6 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.

1.7 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.

1.8 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:

- Add criterion “*The new building or land area is comparable in size to that which it is to replace*” to Policy 34C for a more positive effect with regard to Sustainability Objective 3 (landscape/townscape) – this change has been made.

1.9 A total of X candidate sites were submitted to the Authority for potential inclusion as allocations at the next stage of the Replacement Local Development Plan Development (Deposit). Of these sites X were found to be compatible with the Sustainability Appraisal, X were found to be incompatible and a further X could be compatible with suitable mitigation measures.

What will be the cumulative impacts of the Plans' proposals

1.10 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.

How will other Plans impact?

1.11 Other Plans are also likely to influence the effects of the Pembrokeshire Coast National Park Replacement 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. 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 greater amounts housing and employment opportunities.

Equality Impact Assessments and Methodology Used

1. The specific equality duties in Wales are set out in the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011. They place a duty on Pembrokeshire Coast National Park Authority to assess and consult on the impact its proposed policies will have on people who are protected under the Equality Act 2010 (people who share a protected characteristic of age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation) and its ability to meet the public sector equality duty. In assessing impact the Authority must consider relevant evidence in order to understand the likely or actual effect of policies and practices on protected groups. It must consider taking action to address any issues identified such as, addressing negative impacts, where possible. The Authority must have 'due regard' to the results of this process.¹
2. Equality Impact Assessments are a systematic way of meeting this duty. For further information on Equality Impact Assessments please visit <http://www.eiapractice.wales.nhs.uk/home>
3. The Authority has an Equality Impact Assessment template proforma for assessments. This template and process has been modified due to the nature of the Local Development Plan and plan making process to include the following stages:

Context setting: Information on Local Development Plan review process and wider policy framework it operates in (EIA Pages 4-7).
Review of the evidence base: Consideration of quantitative and qualitative sources and their relevancy to the Local Development Plan review to form basis for identifying impacts for the Assessment (EIA Pages 10-43).
Assessing potential Impact and action planning: Officers provided responses to impacts identified and sought further information or clarification where needed. A number of actions were identified during this process. (EIA Pages 46-84). A summary of the officer responses to impacts identified are attached as Appendix 1.
Equality Impact Summary Report : Produced for Members Consideration
Consultation on Preferred Strategy: Questions on the Equality Impact Assessment have been included within the questionnaire. Equality organisations and community groups have been included within the list of consultees who will be contacted (EIA Pages 44-45).
Monitoring and Review: The content of the Assessment will be reviewed following feedback gathered as part of the consultation.
Declaration: This will be signed following completion of the above stages.

¹ EHRC, 4. Assessing Impact: A guide for listed Public Authorities in Wales: <http://bit.ly/2jqrMoo>

Appendix 1

For background information and analysis of evidence base and impacts please see the full Equality Impact Assessment document.

How could, or does, the policy help advance / promote equality of opportunity?

Accessible facilities and neighbourhoods (Age, Pregnancy and Maternity)

1. The Plan's Spatial strategy seeks to focus development in locations that have facilities and are supported by a public transport network (see the Plan's Vision and Spatial Strategy). Policies seek to conserve key attributes of the natural environment that promote healthy environments, promote specific sustainable design elements such as legible layouts that are pedestrian friendly, accessible buildings, natural surveillance and open spaces. The Plan seeks to safeguard community facilities. Policies 52 and 53 provide a supportive context for this provision. National planning policy allows for the development of affordable housing in areas without access to public transport.
2. The Authority has adopted Supplementary Planning Guidance on Parking which requires the appropriate levels and type of parking facilities for each development type, taking into account users of the development and availability of public transport. The Guidance will be updated for the Replacement Plan.

Addressing Public Health Considerations where possible (Age)

3. The Plan's Spatial strategy seeks to focus development in locations that have facilities accessible by means other than private car. Policies seek to conserve key attributes of the natural environment that promote healthy environments, promote pedestrian friendly layouts and provide and protect open spaces for recreation. Anything ugly, dirty, noisy, crowded, intrusive or uncomfortable that would adversely affect public amenity would not be supported. The plan also seeks to safeguard community facilities. The plan would however have little/no impact on food choice.

Land use policy encouraging a range of job opportunities available to young people in local areas, taking into account accessibility and transport considerations (Age)

4. The Plan allows for small-scale provision of land for employment uses in or adjacent to the defined Centres where public transport availability is more prevalent. Taking into account the rural nature of the National Park, the Strategy also allows for the extension of businesses into the countryside. The Strategy also allows for some development of the visitor economy which is a

major employer in the area and supports the town centres for retailing and commercial uses.

Consultation elements within delivery agreement (Disability)

5. Pembrokeshire Access Group and other disability groups will be consulted as part of the wider consultation. Reasonable adjustments and accessibility will be taken into account when public consultation events are held. A summary of the preferred strategy will be made available in Easy Read (following advice from Pembrokeshire People First). The Authority is applying guidance from Diverse Cymru's Advice Guide: Making Documents Accessible, to the formatting of the preferred strategy.² Authority will respond to reasonable adjustment as they are made. Information on how to make a request in terms of reasonable adjustments and document will be outlined in the document.

Land use policies that have positive impact on health and wellbeing outcomes (Disability, Gender Reassignment, Gender, Sexual Orientation)

6. The Plan includes policies for the protection of open space, including recreational open space and allotments and the Park's special qualities which are beneficial for the health and wellbeing of people. The Community Facilities section is supportive of protecting and providing community facilities; and ensuring that there are opportunities taken to promote sustainable travel choices.

Access considerations to greenspaces, active walking opportunities and allotments (Disability, Gender)

7. The removal of barriers linked to existing development are generally not within the remit of land-use planning. However design and layout of new developments will need to take accessibility for all into account.

Promotion of Accessible design features at a street and neighbourhood level to remove active travel barriers for disabled people (Disability)

8. The Plan's Spatial strategy seeks to focus development in locations that have facilities accessible by means other than private car. Promoting pedestrian/wheelchair friendly environments and routes that link to existing services/facilities forms normal Development Management practice when considering the suitability of a proposal in terms of sustainable design. Consulting the Highways Authority and Access Officer informs this process for specific proposals. However over engineered environments in this respect can reduce the aesthetical quality and specific character of developments. These impacts therefore need to be balanced.

Public and Private Transport Links within the Park linked to wider Pembrokeshire and Regional networks (Gender Reassignment, Religion, Sexual Orientation)

² Diverse Cymru, Advice Guide: Making Documents Accessible - <http://bit.ly/2kxesTc>

9. The Plan seeks to promote sustainable travel choices by permitting facilities to improve public transport linkages. The provision of public transport is outside the remit of land use planning. However, Policies 52 and 53 provide a supportive framework for considering land use related proposals to improve transport links and accessibility.

Location of developments in terms of public transport links, proximity to child care facilities and employment, health and community facilities and shops (Gender, Gender Reassignment, Pregnancy and Maternity, Sexual Orientation)

10. The Plan Strategy allows for new and extended community facilities where they are well-located to meet the community's needs. The Plan seeks to promote sustainable travel choices by permitting facilities to improve public transport linkages. Spatial strategy promotes access to facilities through seeking to locate development in accessible locations.

A need to consider potential community infrastructure needs at a spatial level within Tenby and Saundersfoot. (Race)

11. The Plan includes a supportive policy (Policy 48) for the protection and provision of community facilities. Proposals coming forward can be considered in this context. There were no proposals for specific allocations in the Plan when the candidate site process was undertaken so no needs can be specifically reflected in Policies 2 and 4 and 48.

Protection of historic buildings and sites through land use policy (Religion)

12. National planning policy seeks to conserve the architectural merit of buildings or sites of religious importance that are listed or are within Conservation Areas. Local Development Plan Policy 14 seeks to conserve those buildings that are not listed, but are still of local importance. Many buildings or sites of religious importance would also be protected as community facilities under Local Development Plan Policy 48.

<p>How could / does the policy / decision help to eliminate unlawful discrimination, harassment or victimisation?</p>
--

A need to ensure that Gypsies and Travellers seeking permission for private sites are treated fairly under Policy 46 (Race)

13. The approaches between the Council and Authority have been checked and the same considerations are included between the policy wording and the reasoned justification. It has been agreed to include a monitoring indicator to consider issues arising where 1 or more applications are approved contrary to recommendation. In addition the Monitoring framework for the Local Development Plan ensures that the effectiveness of policies at appeal are also analysed.

Policy 38A (Race)

14. Consideration has been given to how Policy 38A interrelates and impacts on Policy 46 and enforcement related to unauthorised Gypsy and Traveller Sites. Occupancy controls for holiday accommodation are different than those for Gypsy Traveller sites. An issue arising for the 2 unauthorised sites would most likely be equally problematic for a new caravan and camping sites. The issue related to the effect on the character and appearance of the area. Criterion a) of Policy 38A requires caravan and camping proposals to be assimilated into the landscape. Pembrokeshire Gypsy Traveller Accommodation Needs Assessment Group was contacted but no feedback was provided. The Group and Gypsies and Traveller communities will also have opportunity to provide comment as part of the wider consultation on the Preferred Strategy.

How could/does the policy impact on advancing / promoting good relations and wider community cohesion?

Secure by Design (Disability, Gender Reassignment, Gender, Race, Religion or Belief, Sexual Orientation)

15. Secure by Design principles form part of the overall sustainable design considerations for development proposals, including those proposals that may exacerbate existing issues. The Authority consults Dyfed Powys Police who advise on individual proposals. Key principles include the promotion of natural surveillance over public areas and the prevention of dark, unused corners/routes. There is however a need to balance security design features with the overall impact upon street character and attractive, inclusive public realms.

A need to protect space for social infrastructure, including places of worship (Religion)

16. Policy 48 Community Facilities & Infrastructure Requirements provides a supportive policy framework.

Addressing any adverse impact

What practical changes/actions could help reduce or remove any negative impacts identified? If no action is to be taken, this needs to be justified

Meeting the needs of ageing population in terms of suitable accommodation (Age)

17. Planning authority can impact on suitable layout where a mix of dwellings normally provides for a better layout. However it can only seek to achieve an element of affordable housing to meet need shown within the Local Housing Market Assessment. The Housing Market Assessment provides numbers for

overall affordable housing need. However this is not broken down to need relating to older person's accommodation provision which is addressed at an individual project level by the housing authority.

Access to affordable housing young people and facilitation of self-build (Age)

18. The Housing Market Assessment provides overall figures for affordable housing need. At an individual planning application stage the mix of units in terms of number of bedrooms that each affordable house has can be negotiated. Nominations come from the housing waiting list rather than the Plan specifying who occupies in terms of social housing. Private affordable housing will have occupants nominated from the housing waiting list. Local occupancy criteria are normally applied as per Technical Advice Note 2. As planning authority a requirement to include self-build proposals is not possible although these can be pursued by landowners/developers. It is difficult to obtain mortgages for such proposals.

Accessible housing provision (Disability)

18. A life time home standard is applicable to all social housing achieving the Development Quality Requirement (DQR) funded by WG Social Housing Grant. There is however limited provision of affordable housing under DQR in this National Park. To apply the requirement to housing development generally would require evidence of need and evidence of viability. The primary premise of the Plan is that there is no need for market housing so a justification for requiring a Lifetime Home standard on market housing is not feasible. A requirement for a Lifetime Home standard on the affordable housing element would need more information on the nature of need perhaps from the local housing market assessment. Welsh Government is also relying on individual local authorities to consider what the viability implications are for adopting the Lifetime Homes standard. Given the experience of assessing the viability of introducing sprinklers a more national than local type of assessment would be less likely to be challengeable. Part M of Building Regulations does apply the standard for 'visitable dwellings'. The Affordable Housing Group was consulted, no additional comments were received. They will also be able to comment as part of the wider consultation.

Creation of Accessible Walkways and Paths (Disability)

19. The creation of walkways and paths is generally outside of the land use planning remit. Technical Advice Note 12: Design promotes key design principles such as ease of access for all, community safety and safe and clear movement routes that are fit for purpose. The authority consults with an 'Access officer' to advise on the accessibility of proposed buildings when considering planning applications for buildings and public open spaces.

Candidate Site Register

Compatibility Key

Compatible	
More assessment/ information required	
Not compatible	

Location (Community Council)	Site Number	Address	Proposed Use	Representor Number	Candidate Site Assessment	Candidate Site Map	Compatible
Angle	116	East of West Bay Close, Angle	Housing	3159	Site Assessments\Site 116 E of West Bay Close.docx Candidate Site Sustainability Appraisals\116 E West Bay Close SA.docx	Site maps\candidate site 116.pdf Site maps\amended maps\candidate site 116A.pdf	<div style="background-color: #92d050; padding: 5px; margin: 5px auto; width: 80%;">Affordable Housing Exception Site</div>
Angle	117	West of Angle Caravan Park, Angle	Touring Caravan and Camping Site	3159	Site Assessments\Site 117 E of W Angle.docx Candidate Site Sustainability Appraisals\117 E	Site maps\candidate site 117.pdf	

Location (Community Council)	Site Number	Address	Proposed Use	Representor Number	Candidate Site Assessment	Candidate Site Map	Compatible
					West Angle SA.docx		
Angle	118	North of West Bay Close, Angle	Housing	3159	Site Assessments\Site 118 N West Bay Close.docx Candidate Site Sustainability Appraisals\118 N West Bay Close SA.docx	Site maps\candidate site 118.pdf Site maps\amended maps\candidate site 118A.pdf	Affordable Housing Exception Site
Dale	087	Land at Castle Way, Dale	Housing	3258	Site Assessments\Site 087 Castle Way.docx Candidate Site Sustainability Appraisals\087 Castle Way SA.docx	Site maps\candidate site 087.pdf	Affordable Housing Exception Site
Dale	123	South of Castle Way, Dale	Housing	LUC	Site Assessments\Site 123 South of Castle Way.docx Candidate Site Sustainability Appraisals\123 South of Castle	Site maps\candidate site 123.pdf	Affordable Housing Exception Site

Location (Community Council)	Site Number	Address	Proposed Use	Representor Number	Candidate Site Assessment	Candidate Site Map	Compatible
					Way SA.docx		
Dinas Cross	007	End of Tower Hill, Dinas Cross	Housing (1 unit)	4431	Site Assessments\Site 007 End of Tower hill.docx Candidate Site Sustainability Appraisals\007 End of Tower Hill SA.docx	Site maps\candidate site 007.pdf	
Dinas Cross	008	Bryn y Wawr	Housing	2415	Site Assessments\Site 008 Bryn y Wawr.docx Candidate Site Sustainability Appraisals\008 Bryn y Wawr SA.docx	Site maps\candidate site 008.pdf	Below Allocation Threshold
Dinas Cross	009	Brynhenllan Farm, Dinas Cross	Housing	2415	Site Assessments\Site 009 Brynhenllan Farm.docx Candidate Site Sustainability Appraisals\009 Brynhenllan	Site maps\candidate site 009.pdf	Below Allocation Threshold

Location (Community Council)	Site Number	Address	Proposed Use	Representor Number	Candidate Site Assessment	Candidate Site Map	Compatible
					Farm SA.docx		
Dinas Cross	013	Land South of Rhoshelyg and West of Spring Hill, Dinas Cross	Affordable Housing, Senior Citizen Housing, allotments and environmental scheme	2882	Site Assessments\Site 013 Land South of Rhoshelyg and West of Spring Hill.docx Candidate Site Sustainability Appraisals\013 Land South of Rhoshelyg and West of Spring Hill SA.docx	Site maps\candidate site 013.pdf Site maps\amended maps\candidate site 013A.pdf	
Dinas Cross	032	Rhoshelyg, Dinas Cross	Affordable Housing/Sheltered Housing	4054	Site Assessments\Site 032 Rhoshelyg.docx Candidate Site Sustainability Appraisals\032 Rhoshelyg SA.docx	Site maps\candidate site 032.pdf	
Dinas Cross	054	Land to rear of Angorfan Bungalow and Dinas Cross Service Station, Dinas	Housing and Employment	4453	Site Assessments\Site 054 Land to the rear of Angorfan Bungalow and Dinas Cross	Site maps\candidate site 054.pdf	

Location (Community Council)	Site Number	Address	Proposed Use	Representor Number	Candidate Site Assessment	Candidate Site Map	Compatible
		Cross			Service Station.docx Candidate Site Sustainability Appraisals\054 Angorfan and Dinas Cross Service Station SA.docx		
Dinas Cross	074	Land at Spring Hill, Dinas Cross	Housing/Affordable Housing	4012	Site Assessments\Site 074 Land at Spring Hill.docx Candidate Site Sustainability Appraisals\074 Land at Spring Hill SA.docx	Site maps\candidate site 074.pdf Site maps\amended maps\candidate site 074A.pdf	
Dinas Cross	091	Land opposite Freemasons Arms, Dinas Cross	Housing (1 Unit)	4466	Site Assessments\Site 091 Land Opposite Freemasons Arms.docx Candidate Site Sustainability Appraisals\091 Land opposite	Site maps\candidate site 091.pdf	

Location (Community Council)	Site Number	Address	Proposed Use	Representor Number	Candidate Site Assessment	Candidate Site Map	Compatible
					Freemasons Arms SA.docx		
Dinas Cross	092	Land adjacent Porthlisky, Dinas Cross	Housing	4467	Site Assessments\Site 092 Land adjacent Porthlisky.docx Candidate Site Sustainability Appraisals\092 Land adj Porthlisky SA.docx	Site maps\candidate site 092.pdf	
Dinas Cross	095	Land at Spring Hill, Dinas Cross	Housing	4470	Site Assessments\Site 095 Land at Spring Hill.docx Candidate Site Sustainability Appraisals\095 Land at Spring Hill SA.docx	Site maps\candidate site 095.pdf Site maps\amended maps\candidate site 095A.pdf	
Dinas Cross	105	Land adjacent Nyth y Wennol, Dinas Cross	Housing	3739	Site Assessments\Site 105 Land adjacent Nyth y Wennol.docx Candidate Site	Site maps\candidate site 105.pdf	

Location (Community Council)	Site Number	Address	Proposed Use	Representor Number	Candidate Site Assessment	Candidate Site Map	Compatible
					Sustainability Appraisals\105 Nyth y Wennol SA.docx		
Dinas Cross	109	Land adjacent Clydfan	Housing (1 unit)	3512	Site Assessments\Site 109 Land adjacent to Clydfan.docx Candidate Site Sustainability Appraisals\109 Land adjacent Clydfan SA.docx	Site maps\candidate_site_109.pdf	
Dinas Cross	124	East of Tower Hill, Dinas Cross	Housing	LUC	Site Assessments\Site 124 East of Tower Hill.docx Candidate Site Sustainability Appraisals\124 East of Tower Hill SA.docx	Site maps\candidate_site_124.pdf	
Dinas Cross	125	West of Feidr Fawr, Dinas Cross	Housing	LUC	Site Assessments\Site 125 West of Feidr Fawr.docx Candidate Site	Site maps\candidate_site_125.pdf	

Location (Community Council)	Site Number	Address	Proposed Use	Representor Number	Candidate Site Assessment	Candidate Site Map	Compatible
					Sustainability Appraisals\125 West of Feidr Fawr SA.docx		
Dinas Cross	134	Opposite Bay View Terrace (to field boundary) , Dinas Cross	Housing	LUC	Site Assessments\Site 134 Opposite Bay View Terrace (to field boundary).docx Candidate Site Sustainability Appraisals\134 Opposite Bay View Terrace (to field boundary) SA.docx	Site maps\candidate site 134.pdf	
Dinas Cross	135	Rear of Spring Hill and Bro Helyg, Dinas Cross	Housing	LUC	Site Assessments\Site 135 Rear of Spring Hill and Bro Helyg.docx Candidate Site Sustainability Appraisals\135 Rear of Spring Hill and Bro Helyg SA.docx	Site maps\candidate site 135.pdf Site maps\amended maps\candidate site 135A.pdf	

Location (Community Council)	Site Number	Address	Proposed Use	Representor Number	Candidate Site Assessment	Candidate Site Map	Compatible
Dinas Cross	136	Land South of A487, South West of Castle Terrace, Dinas Cross	Housing	LUC	Site Assessments\Site 136 Land south of A487, South West of Castle Terrace.docx Candidate Site Sustainability Appraisals\136 Land South of A487, South West of Castle Terrace SA.docx	Site maps\candidate_site_136.pdf F:\Park Direction\Subjects\Local Development Plan 2nd\Candidate Sites\Site maps\amended maps\candidate_site_136A.pdf	
Dinas Cross	137	Opposite Bay View Terrace, Dinas Cross	Housing	LDP	Site Assessments\Site 137 Opposite Bay View Terrace.docx Candidate Site Sustainability Appraisals\137 Opposite Bay View Terrace SA.docx	Site maps\candidate_site_137.pdf	
Herbrandston	149	East of Herbrandston Hall	Housing	LDP	Site Assessments\Site 149 East of Herbrandston Hall.docx	Site maps\candidate_site_149.pdf	Affordable Housing Exception Site

Location (Community Council)	Site Number	Address	Proposed Use	Representor Number	Candidate Site Assessment	Candidate Site Map	Compatible
					Candidate Site Sustainability Appraisals\149 East of Herbrandston Hall SA.docx		
Lamphey	010	The Burrows, Freshwater East	Protection of site from unsuitable developments	3509	Site Assessments\Site 010 The Burrows.docx Candidate Site Sustainability Appraisals\010 The Burrows SA.docx	Site maps\candidate_site_010.pdf	
Lamphey	012	Old Miracle Inn Site, Freshwater East	Tourist Information/ Recreation	3509	Site Assessments\Site 012 Freshwater East car park.docx Candidate Site Sustainability Appraisals\012 FWE Car Park SA.docx	Site maps\candidate_site_012.pdf	

Location (Community Council)	Site Number	Address	Proposed Use	Representor Number	Candidate Site Assessment	Candidate Site Map	Compatible
Llanrhian	014	Glasfryn Field, Square and Compass	Affordable Housing	4434	Site Assessments\Site 014 Glasfryn Field, Square and Compass.docx Candidate Site Sustainability Appraisals\014 Glasfryn Field SA.docx	Site maps\candidate_site_014.pdf Site maps\amended maps\candidate_site_014A.pdf	
Llanrhian	050	Land adjoining Cefn Galod, Trefin	Housing	4449	Site Assessments\Site 050 Land adjoining Cefn Galod.docx Candidate Site Sustainability Appraisals\050 Land adjoining Cefn Galod SA.docx	Site maps\candidate_site_050.pdf	
Llanrhian	093	Land off Heol Crwys, Trefin	Housing	4468	Site Assessments\Site 093 Land off Heol Crwys.docx Candidate Site Sustainability	Site maps\candidate_site_050.pdf	

Location (Community Council)	Site Number	Address	Proposed Use	Representor Number	Candidate Site Assessment	Candidate Site Map	Compatible
					Appraisals\093 Land off Heol Crwys SA.docx		
Square and Compass	106	Land adjacent Bryngolau, Square and Compass	Housing	4474	Site Assessments\Site 106 Land adjacent Bryngolau, SQ and Compass.docx Candidate Site Sustainability Appraisals\106 Land adjacent Bryngolau SA.docx	Site maps\candidate site 106.pdf	
Llanrhian	150	North of Heol Crwys, Trefin	Housing	LDP	Site Assessments\Site 150 North of Heol Crwys Trefin.docx Candidate Site Sustainability Appraisals\150 North of Heol Crwys SA.docx	Site maps\candidate site 150.pdf	Affordable Housing Exception Site
Maenclochog	127	East of Belle Vue, Rosebush	Housing	LUC	Site Assessments\Site 127 East of	Site maps\candidate site 127.pdf	

Location (Community Council)	Site Number	Address	Proposed Use	Representor Number	Candidate Site Assessment	Candidate Site Map	Compatible
					Belle Vue Rosebush.docx Candidate Site Sustainability Appraisals\127 East of Belle Vue SA.docx		
Maenclochog	128	South of the Caravan Park, Rosebush	Housing	LUC	Site Assessments\Site 128 South of the Caravan Park Rosebush.docx Candidate Site Sustainability Appraisals\128 South of the Caravan Park SA.docx	Site maps\candidate_site_128.pdf	Below Allocation Threshold
Maenclochog	129	West of Rosebush	Housing	LUC	Site Assessments\Site 129 West of Rosebush.docx Candidate Site Sustainability Appraisals\129 West of Rosebush SA.docx	Site maps\candidate_site_129.pdf	

Location (Community Council)	Site Number	Address	Proposed Use	Representor Number	Candidate Site Assessment	Candidate Site Map	Compatible
Manorbier	019	Middle Hill Farm, Manorbier	Affordable Housing	4437	Site Assessments\Site 019 Middle Hill Farm.docx Candidate Site Sustainability Appraisals\019 Middle Hill SA.docx	Site maps\candidate site 019.pdf	
Manorbier	022	Park Farm, Manorbier (LDP1 - known as opposite Bush Terrace Jameston)	Housing/ Affordable Housing	3317	Site Assessments\Site 022 Park Farm.docx Candidate Site Sustainability Appraisals\022 Park Farm SA.docx	Site maps\candidate site 022.pdf	
Manorbier	024	Tarr Farm, Manorbier	Housing	4439	Site Assessments\Site 024 Tarr Farm.docx Candidate Site Sustainability Appraisals\024 Tarr Farm SA.docx	Site maps\candidate site 024.pdf	
Manorbier	028	Adjacent to	Housing	3320	Site	Site	Below

Location (Community Council)	Site Number	Address	Proposed Use	Representor Number	Candidate Site Assessment	Candidate Site Map	Compatible
		Kano, Manorbier			Assessments\Site 028 Adj Kano.docx Candidate Site Sustainability Appraisals\028 Adj Kano SA.docx	maps\candidate_site_028.pdf	allocation threshold.
Manorbier	029	Opposite Manorbier School, Manorbier Station	Housing	4189	Site Assessments\Site 29 Opp Man School.docx Candidate Site Sustainability Appraisals\029 Oppo Manorbier School SA.docx	Site maps\candidate_site_029.pdf	
Manorbier	030	Springfields, Manorbier	Housing	4442	Site Assessments\Site 30 Springfields.docx Candidate Site Sustainability Appraisals\030 Springfields SA.docx	Site maps\candidate_site_030.pdf	
Manorbier	033	Green Grove, Jameston	Housing/ Affordable	3497	Site Assessments\Site	Site maps\candidate_site_033.pdf	

Location (Community Council)	Site Number	Address	Proposed Use	Representor Number	Candidate Site Assessment	Candidate Site Map	Compatible
			Housing		e 033 Green Grove.docx Candidate Site Sustainability Appraisals\033 Green Grove SA.docx		
Manorbier	042	Kiln House Lane, Jameston	Housing/ Affordable Housing	3497	Site Assessments\Site 042 Kiln House Lane.docx Candidate Site Sustainability Appraisals\042 Kiln House Lane SA.docx	Site maps\candidate_site_042.pdf	
Manorbier	078	West of B4585, Skrinkle, Manorbier	Housing	4460	Site Assessments\Site 078 West of B4585.docx Candidate Site Sustainability Appraisals\078 W of B4585 SA.docx	Site maps\candidate_site_078.pdf	
Manorbier	086	West of The Green, Lydstep	Market and Affordable Housing	4464	Site Assessments\Site 086 W The	Site maps\candidate_site_086.pdf	

Location (Community Council)	Site Number	Address	Proposed Use	Representor Number	Candidate Site Assessment	Candidate Site Map	Compatible
					Green.docx Candidate Site Sustainability Appraisals\086 W The Green SA.docx	Site maps\amended maps\candidate site 086A.pdf	
Manorbier	110	Orchard End, Manorbier	Housing	3294	Site Assessments\Site 110 Orchard End.docx Candidate Site Sustainability Appraisals\110 Orchard End SA.docx	Site maps\candidate site 110.pdf	
Manorbier	119	North Norton, Manorbier	Housing	3639	Site Assessments\site 119 N Norton.docx Candidate Site Sustainability Appraisals\119 N Norton SA.docx	Site maps\candidate site 119.pdf	
Manorbier	126	South of The Green, Lydstep	Housing		Site Assessments\Site 126 South The Green.docx	Site maps\candidate site 126.pdf	Affordable Housing Exception

Location (Community Council)	Site Number	Address	Proposed Use	Representor Number	Candidate Site Assessment	Candidate Site Map	Compatible
					Candidate Site Sustainability Appraisals\126 S The Green SA.docx		Site
Manorbier	138	Land at Buttylands Manorbier Station	Housing		Site Assessments\Site 138 Buttylands.docx Candidate Site Sustainability Appraisals\138 Buttylands SA.docx	Site maps\candidate_site_138.pdf	
Manorbier	139	Land at Manorbier Train Station Manorbier Station	Car Park	LDP	Site Assessments\Site 139 Manorbier Train Stn.docx Candidate Site Sustainability Appraisals\139 Manorbier Train Stn SA.docx	Site maps\candidate_site_139.pdf	
Marloes	053	Land formerly occupied by South Bungalow, Marloes	Housing	4452	Site Assessments\Site 053 Land formerly occupied by South	Site maps\candidate_site_053.pdf	Below allocation threshold

Location (Community Council)	Site Number	Address	Proposed Use	Representor Number	Candidate Site Assessment	Candidate Site Map	Compatible
					Bungalow.docx Candidate Site Sustainability Appraisals\053 Land formerly occupied by South Bungalow SA.docx		
Marloes	085	Land North of Glebe Lane, Marloes	Housing	2374	Site Assessments\Site 085 Land north of Glebe Lane.docx Candidate Site Sustainability Appraisals\085 Land North of Glebe Lane SA.docx	Site maps\candidate_site_085.pdf	
Marloes	101	Land West of Smithy Cottage, Marloes	Housing	4471	Site Assessments\Site 101 West of Smithy Cottage.docx Candidate Site Sustainability Appraisals\101 Land West of	Site maps\candidate_site_101.pdf	

Location (Community Council)	Site Number	Address	Proposed Use	Representor Number	Candidate Site Assessment	Candidate Site Map	Compatible
					Smithy Cottage SA.docx		
Martletwy	043	Adjacent to Bank Cottage, Lawrenny	Single dwelling	4446	Site Assessments\Site 043 Adj Bank Cottage.docx Candidate Site Sustainability Appraisals\043 Adj Bank Cott SA.docx	Site maps\candidate site 043.pdf	
Martletwy	044	Part of Lawrenny Home Farm	Housing	4446	Site Assessments\Site 044 Broad Lane.docx Candidate Site Sustainability Appraisals\044 Broad Lane SA.docx	Site maps\candidate site 044.pdf Site maps\amended maps\candidate site 044A.pdf	<div style="background-color: red; height: 20px; width: 100%;"></div> <div style="background-color: #90EE90; height: 20px; width: 100%; text-align: center;">Affordable Housing Exception Site</div>
Martletwy	045	Lawrenny Home Farm	Housing	4446	Site Assessments\Site 045 Part of Lawrenny Home Farm.docx Candidate Site	Site maps\candidate site 045.pdf	<div style="background-color: yellow; height: 20px; width: 100%;"></div>

Location (Community Council)	Site Number	Address	Proposed Use	Representor Number	Candidate Site Assessment	Candidate Site Map	Compatible
					Sustainability Appraisals\045 Lawrenny Home Farm SA.docx		
Martletwy	046	Former Mansion Site, Lawrenny	Mixed Tourism/ Leisure	4446	Site Assessments\Site 046 Former Mansion Site.docx Candidate Site Sustainability Appraisals\046 Mansion Site SA.docx	Site maps\candidate_site_046.pdf	
Martletwy	121	Adjacent to Furzy Park, Landshipping	Affordable housing	4482	Site Assessments\Site 121 Adj Furzy Park.docx Candidate Site Sustainability Appraisals\121 Furzy Park SA.docx	Site maps\candidate_site_121.pdf	
Martletwy	122	Adjacent to Scalewood, Landshipping	Affordable housing	4482	Site Assessments\Site 122 Adj Scalewood.docx Candidate Site	Site maps\candidate_site_122.pdf	

Location (Community Council)	Site Number	Address	Proposed Use	Representor Number	Candidate Site Assessment	Candidate Site Map	Compatible
					Sustainability Appraisals\122 Scalewood SA.docx		
Nevern	020	Argoed, Felindre Farchog	Housing	4438	Site Assessments\Site 020 Argoed.docx Candidate Site Sustainability Appraisals\020 Argoed, Felindre Farchog SA.docx	Site maps\candidate_site_020.pdf	
Nevern	115	Land to rear of Salutation Inn, Felindre Farchog	Housing	4476	Site Assessments\Site 115 Land to the rear of Salutation Inn.docx Candidate Site Sustainability Appraisals\115 Land to the rear of Salutation Inn SA.docx	Site maps\candidate_site_115.pdf	Below Allocation Threshold.
Nevern	140	North of The Vicarage, Nevern	Housing	LUC	Site Assessments\Site 140 North of the Vicarage.docx	Site maps\candidate_site_140.pdf	

Location (Community Council)	Site Number	Address	Proposed Use	Representor Number	Candidate Site Assessment	Candidate Site Map	Compatible
					Candidate Site Sustainability Appraisals\140 North of The Vicarage SA.docx		
Newport	047	Land East of Feidr Bentick adjacent A487, Newport	Housing	4447	Site Assessments\Site 047 Land East of Feidr Bentick adj A487.docx Candidate Site Sustainability Appraisals\047 Land East of Feidr Bentick adjacent A487 SA.docx	Site maps\candidate site 047.pdf	
Newport	048	Land off Feidr Bentick, Newport	Housing	4447	Site Assessments\Site 048 Land off Feidr Bentick.docx Candidate Site Sustainability Appraisals\048 Land East of Feidr Bentick	Site maps\candidate site 048.pdf	

Location (Community Council)	Site Number	Address	Proposed Use	Representor Number	Candidate Site Assessment	Candidate Site Map	Compatible
					SA.docx		
Newport	049	Land off Ffordd Bedd Morris (South East), Newport	Housing	4448	Site Assessments\Site 049 Land off Ffordd Bedd Morris (South East).docx Candidate Site Sustainability Appraisals\049 Land off Ffordd Bedd Morris (South East) SA.docx	Site maps\candidate site 049.pdf	
Newport	051	Land East of Treffynon, Ffordd Bedd Morris	Housing	4450	Site Assessments\Site 051 Land to the East of Treffynon, Ffordd Bedd Morris.docx Candidate Site Sustainability Appraisals\051 Land East of Treffynon, Ffordd Bedd Morris SA.docx	Site maps\candidate site 051.pdf	
Newport	057	Parc y Plant, Newport	Open Space/Playing	4478	Site Assessments\Site	Site maps\candidate site 057.pdf	

Location (Community Council)	Site Number	Address	Proposed Use	Representor Number	Candidate Site Assessment	Candidate Site Map	Compatible
			Field		e 057 Parc y Plant.docx Candidate Site Sustainability Appraisals\057 Parc y Plant SA.docx		
Newport	060	Land adjacent to Newport Business Park	Employment/commercial	2902	Site Assessments\Site 060 Land adjacent to Newport Business Park.docx Candidate Site Sustainability Appraisals\060 Land adjacent Newport Business Park SA.docx	Site maps\candidate_site_060.pdf	Not an allocation
Newport	061	Parc y Plant, Newport	Affordable Housing	2902	Site Assessments\Site 061 Parc y Plant.docx Candidate Site Sustainability Appraisals\061	Site maps\candidate_site_061.pdf	

Location (Community Council)	Site Number	Address	Proposed Use	Representor Number	Candidate Site Assessment	Candidate Site Map	Compatible
					Parc y Plant SA.docx		
Newport	062	Former Market Garden, Cotham, Newport	Open Space/Green Wedge	2902	Site Assessments\Site 062 Former Market Garden, Cotham.docx Candidate Site Sustainability Appraisals\062 Former Market Garden, Cotham SA.docx	Site maps\candidate site 062.pdf	
Newport	063	Cotham Fields adjacent A487 (West) , Newport	Road improvement	2902	Site Assessments\Site 063 Cotham Fields adj A487 (West).docx Candidate Site Sustainability Appraisals\063 Cotham Fields Adj A487 (West) SA.docx	Site maps\candidate site 063.pdf	
Newport	064	Cotham Fields adjacent A487 (East) , Newport	Road Improvement	2902	Site Assessments\Site 064 Cotham Fields adj A487 (East).docx	Site maps\candidate site 064.pdf	

Location (Community Council)	Site Number	Address	Proposed Use	Representor Number	Candidate Site Assessment	Candidate Site Map	Compatible
					Candidate Site Sustainability Appraisals\064 Cotham Fields Adj A487 (east) SA.docx		
Newport	065	Parrog Yard, Newport	Affordable Housing	2902	Site Assessments\Site 065 Parrog Yard, Newport.docx Candidate Site Sustainability Appraisals\065 Parrog Yard SA.docx	Site maps\candidate site 065.pdf Site maps\amended maps\candidate site 065 & 067A.pdf	
Newport	066	Land off Feidr Bentick, Newport	Housing and Car Park	2902	Site Assessments\Site 066 Land off Feidr Bentick.docx Candidate Site Sustainability Appraisals\066 Land East of Feidr Bentick SA.docx	Site maps\candidate site 066.pdf	
Newport	067	The Pottery	Housing/Afford	2902	Site	Site	

Location (Community Council)	Site Number	Address	Proposed Use	Representor Number	Candidate Site Assessment	Candidate Site Map	Compatible
		Site, Newport	able Housing		Assessments\Site 067 The Pottery Site, Newport.docx Candidate Site Sustainability Appraisals\067 Pottery site SA.docx	maps\candidate_site_067.pdf Site maps\amended maps\candidate_site_065 & 067A.pdf	
Newport	068	North of Newport Business Park	Housing	2902	Site Assessments\Site 068 N Newport Business Park.docx Candidate Site Sustainability Appraisals\068 North of Newport Business Park SA.docx	Site maps\candidate_site_068.pdf	
Newport	069	Land north of Tir Treharn, Newport	Housing	2902	Site Assessments\Site 069 Land North of Tir Treharn.docx Candidate Site Sustainability Appraisals\069	Site maps\candidate_site_069.pdf	

Location (Community Council)	Site Number	Address	Proposed Use	Representor Number	Candidate Site Assessment	Candidate Site Map	Compatible
					North of Tir Treharne SA.docx		
Newport	070	Opposite Newport Playing Fields, Newport	Open Space for recreation, park and allotments	2902	Site Assessments\Site 070 Opp Newport Play Field.docx Candidate Site Sustainability Appraisals\070 Opposite Newport Playing Fields SA.docx	Site maps\candidate site 070.pdf	Not an allocation
Newport	071	Land East of Newport Business Park	Commercial	2902	Site Assessments\Site 071 E of Business Park.docx Candidate Site Sustainability Appraisals\071 Land east of Newport Business Park SA.docx	Site maps\candidate site 071.pdf	
Newport	072	Land off Ffordd Bedd Morris (North	Housing	4448	Site Assessments\Site 072 Land off	Site maps\candidate site 072.pdf	

Location (Community Council)	Site Number	Address	Proposed Use	Representor Number	Candidate Site Assessment	Candidate Site Map	Compatible
		West), Newport			Ffordd Bedd Morris (North West).docx Candidate Site Sustainability Appraisals\072 Land off Ffordd Bedd Morris (North West) SA.docx		
Newport	082	Land adjacent to Newport Business Park	Retention of Mixed Use Allocation MA232	4465	Site Assessments\Site 082 Land adjacent to Newport Business Park.docx Candidate Site Sustainability Appraisals\082 Land adjacent Newport Business Park SA.docx	Site maps\candidate_site_082.pdf	Not an allocation
Newport	083	Land adjacent to Newport Business Park	Housing/Employment	4465	Site Assessments\Site 083 Land adjacent to Newport	Site maps\candidate_site_083.pdf	Not an allocation

Location (Community Council)	Site Number	Address	Proposed Use	Representor Number	Candidate Site Assessment	Candidate Site Map	Compatible
					Business Park.docx Candidate Site Sustainability Appraisals\083 Land adjacent Newport Business Park SA.docx		
Newport	088	Land North and East of Newport Business Park	Housing	4465	Site Assessments\Site 88 Land North and East of Newport Business Park.docx Candidate Site Sustainability Appraisals\088 Land North and East of Newport Business Park SA.docx	Site maps\candidate site 088.pdf Site maps\amended maps\candidate site 088A.pdf	
Newport	089	Land North and East of Newport	Housing	4465	Site Assessments\Site 89 Land North	Site maps\candidate site 089.pdf	

Location (Community Council)	Site Number	Address	Proposed Use	Representor Number	Candidate Site Assessment	Candidate Site Map	Compatible
		Business Park			and East of Newport Business Park.docx Candidate Site Sustainability Appraisals\089 Land North and East of Newport Business Park SA.docx	Site maps\amended maps\candidate site 089A.pdf	
Newport	090	Land North and East of Newport Business Park	Housing/Employment	4465	Site Assessments\Site 90 Land North and East of Newport Business Park.docx Candidate Site Sustainability Appraisals\090 Land North and East of Newport Business Park SA.docx	Site maps\candidate site 090.pdf Site maps\amended maps\candidate site 090A.pdf	
Newport	096	Cippin Stone, Newport	Housing	3435	Site Assessments\Site 096 Cippin	Site maps\candidate site 096.pdf	

Location (Community Council)	Site Number	Address	Proposed Use	Representor Number	Candidate Site Assessment	Candidate Site Map	Compatible
					Stone.docx Candidate Site Sustainability Appraisals\096 Cippin Stone SA.docx	Site maps\amended maps\candidate site 096A.pdf	
Newport	100	Cotham Fields adjacent A487, Newport	Housing	3435	Site Assessments\Site 100 Cotham Fields adjacent A487.docx Candidate Site Sustainability Appraisals\100 Cotham Fields adjacent A487 SA.docx	Site maps\candidate site 100.pdf	
Newport	104	Depot Car Park, Newport	Car Park	4437	Site Assessments\Site 104 Depot Car Park.docx Candidate Site Sustainability Appraisals\104 depot Car Park SA.docx	Site maps\candidate site 104.pdf	Not an allocation
Newport	107	Land West of Cotham	Car Park in association	3445	Site Assessments\Site	Site maps\candidate site 107.pdf	

Location (Community Council)	Site Number	Address	Proposed Use	Representor Number	Candidate Site Assessment	Candidate Site Map	Compatible
		Cottage, Newport	with Memorial Hall		e 107 Land West of Cotham Cottage.docx Candidate Site Sustainability Appraisals\107 Land West of Cotham Cottage SA.docx		
Newport	141	North of Feidr Eglwys, Newport	Housing	LDP	Site Assessments\Site 141 North of Feidr Eglwys, Newport.docx Candidate Site Sustainability Appraisals\141 North of Feidr Eglwys SA.docx	Site maps\candidate site 141.pdf	
Saundersfoot	011	Land at Valley Road, Saundersfoot	Single dwelling	4433	Site Assessments\Site 011 Valley Road.docx Candidate Site Sustainability Appraisals\011 Valley Road SA.docx	Site maps\candidate site_010.pdf	

Location (Community Council)	Site Number	Address	Proposed Use	Representor Number	Candidate Site Assessment	Candidate Site Map	Compatible
Saundersfoot	015	Land at Sandy Hill, Saundersfoot	Housing	3284	Site Assessments\Site 015 Sandy Hill Road.docx Candidate Site Sustainability Appraisals\015 Sandy Hill Road SA.docx	Site maps\candidate site 015.pdf	
Saundersfoot	016	Brooklands, Saundersfoot	Housing	3284	Site Assessments\Site 016 Adj Brooklands.docx Candidate Site Sustainability Appraisals\016 Adj Brooklands Hsg SA.docx	Site maps\candidate site 016.pdf	
Saundersfoot	017	Brooklands, Saundersfoot	Commercial/ tourism/leisure facilities	3284	Site Assessments\Site 017 Adj Brooklands Tourism.docx Candidate Site Sustainability Appraisals\017 Adj Brooklands Tourism.docx	Site maps\candidate site 017.pdf	

Location (Community Council)	Site Number	Address	Proposed Use	Representor Number	Candidate Site Assessment	Candidate Site Map	Compatible
Saundersfoot	025	Saundersfoot Railway Station	Housing/ workshop/ parking	4441	Site Assessments\Site 025 Saundersfoot Station.docx Candidate Site Sustainability Appraisals\025 Saundersfoot station SA.docx	Site maps\candidate site 025.pdf	
Saundersfoot	031	North of Whitlow, Saundersfoot	Housing/ Affordable Housing	4411	Site Assessments\Site 031 North of Whitlow.docx Candidate Site Sustainability Appraisals\031 N of Whitlow SA.docx	Site maps\candidate site 031.pdf	
Saundersfoot	036	Penny Farm, Site A, Saundersfoot	Housing	4445	Site Assessments\Site 036 Penny Farm A.docx Candidate Site Sustainability Appraisals\036 Penny Farm A SA.docx	Site maps\candidate site 036.pdf	

Location (Community Council)	Site Number	Address	Proposed Use	Representor Number	Candidate Site Assessment	Candidate Site Map	Compatible
Saundersfoot	037	Penny Farm, Site B, Saundersfoot	Housing	4445	Site Assessments\Site 037 Penny Farm B.docx Candidate Site Sustainability Appraisals\037 Penny Farm B SA.docx	Site maps\candidate site 037.pdf	Yellow
Saundersfoot	038	Penny Farm, Site C, Saundersfoot	Housing	4445	Site Assessments\Site 038 Penny Farm C.docx Candidate Site Sustainability Appraisals\038 Penny Farm C SA.docx	Site maps\candidate site 038.pdf	Red
Saundersfoot	052	The Barbeque Lawn, Saundersfoot	Open Space	4451	Site Assessments\Site 052 BBQ Lawn.docx Candidate Site Sustainability Appraisals\052 BBQ SA.docx		Green
Saundersfoot	059	Ivy Chimney Lane, Near	Affordable housing	4455	Site Assessments\Site	Site maps\candidate site 059.pdf	Red

Location (Community Council)	Site Number	Address	Proposed Use	Representor Number	Candidate Site Assessment	Candidate Site Map	Compatible
		Kilgetty			e 059 Ivy Chimney Lane.docx Candidate Site Sustainability Appraisals\059 Ivy Chimney Lane SA.docx		
Solva	026	North of Maesy Forwen, Solva	Housing	2397	Site Assessments\Site 026 North of Maes Y Forwen.docx Candidate Site Sustainability Appraisals\026 North of Maes Ewan SA.docx	Site maps\candidate_site_026.pdf	
Solva	075	Middle Mill Quarry	Housing	4458	Site Assessments\Site 075 Middle Mill Quarry.docx Candidate Site Sustainability Appraisals\075 Middle Mill Quarry SA.docx	Site maps\candidate_site_075.pdf	
Solva	076	Middle Mill	Quarrying and	4458	Site	Site	

Location (Community Council)	Site Number	Address	Proposed Use	Representor Number	Candidate Site Assessment	Candidate Site Map	Compatible
		Quarry	restoration to community use.		Assessments\Site 076 Middle Mill Quarry.docx Candidate Site Sustainability Appraisals\076 Middle Mill Quarry SA.docx	maps\candidate_site_076.pdf	
Solva	077	Middle Mill Quarry	Quarrying followed by housing	4458	Site Assessments\Site 077 Middle Mill Quarry.docx Candidate Site Sustainability Appraisals\077 Middle Mill Quarry SA.docx	Site maps\candidate_site_077.pdf	
Solva	102	Bank House, Solva	Housing	4412	Site Assessments\Site 102 Bank House.docx Candidate Site Sustainability Appraisals\102 Bank House SA.docx	Site maps\candidate_site_102.pdf	Not an allocation
Solva	111	Land adjacent Bro Dawel,	Housing/Community Use	4398	Site Assessments\Site	Site maps\candidate_site_111.pdf	Affordable housing

Location (Community Council)	Site Number	Address	Proposed Use	Representor Number	Candidate Site Assessment	Candidate Site Map	Compatible
		Solva			e 111 Land adjacent Bro Dawel.docx Candidate Site Sustainability Appraisals\111 Land adjacent to Bro Dawel SA.docx		exception site
Solva	151	Land North West of Maes Ewan	Housing	LDP	Site Assessments\Site 151 Land North West of Maes Ewan, Solva.docx Candidate Site Sustainability Appraisals\151 Land North West of Maes Ewan SA.docx	Site maps\candidate site 151.pdf	
Stackpole and Castlemartin	114	Stackpole VC School, Stackpole	Housing/ Community Recreation	4398	Site Assessments\Site 114 Stackpole School.docx Candidate Site Sustainability Appraisals\114	Site maps\candidate site 114.pdf Site maps\amended maps\candidate site 114A.pdf	<div style="background-color: red; height: 20px; width: 100%;"></div> Affordable Housing Exception Site

Location (Community Council)	Site Number	Address	Proposed Use	Representor Number	Candidate Site Assessment	Candidate Site Map	Compatible
					Stackpole School SA.docx		
Stackpole and Castlemartin	130	West of Stackpole	Housing	LUC	Site Assessments\Site 130 W of Stackpole.docx Candidate Site Sustainability Appraisals\130 W Stackpole SA.docx	Site maps\candidate site 130.pdf	
Stackpole and Castlemartin	131	North of Jason's Corner, Stackpole	Housing	LUC	Site Assessments\Site 131 N Jasons Corner.docx Candidate Site Sustainability Appraisals\131 N Jasons Corner SA.docx	Site maps\candidate site 131.pdf Site maps\amended maps\candidate site 131A.pdf	
Stackpole and Castlemartin	132	North of Stackpole School	Housing	LUC	Site Assessments\Site 132 N of Stackpole.docx Candidate Site Sustainability Appraisals\132 N Stackpole.docx	Site maps\candidate site 132.pdf	

Location (Community Council)	Site Number	Address	Proposed Use	Representor Number	Candidate Site Assessment	Candidate Site Map	Compatible
Stackpole and Castlemartin	133	East of Stackpole	Housing (single dwelling)	LUC	Site Assessments\Site 133 E Stackpole.docx Candidate Site Sustainability Appraisals\133 E Stackpole.docx	Site maps\candidate_site_133.pdf	
St Davids	002	West of Glasfryn Road (Part of HA737), St Davids	Housing	4393	Site Assessments\Site 002 West of Glasfryn Road (Part of HA737).docx Candidate Site Sustainability Appraisals\002 West of Glasfryn Road (Part of HA737) SA.docx	Site maps\candidate_site_002.pdf	
St Davids	003	Land East of Glasfryn Road), St Davids	Housing	4393	Site Assessments\Site 003 Land East of Glasfryn Road.docx Candidate Site Sustainability Appraisals\003	Site maps\candidate_site_003.pdf	

Location (Community Council)	Site Number	Address	Proposed Use	Representor Number	Candidate Site Assessment	Candidate Site Map	Compatible
					Land East of Glasfryn Road SA.docx		
St Davids	004	Land West of Millard Park), St Davids	Housing	4393	Site Assessments\Site 004 Land West of Millard Park.docx Candidate Site Sustainability Appraisals\004 Land West of Millard Park SA.docx	Site maps\candidate site 004.pdf	
St Davids	021	Glasfryn Road field nos. 8877, 8463, 9372), St Davids	Housing	4406	Site Assessments\Site 021 Glasfryn Road Field Nos 8877, 8463 and 9372.docx Candidate Site Sustainability Appraisals\021 Glasfryn Road Field Nos 8877, 8463 and 9372 SA.docx	Site maps\candidate site 021.pdf Site maps\amended maps\candidate site 021A.pdf	
St Davids	080	Land East of Maes Elfed, St	Housing	4461	Site Assessments\Site	Site maps\candidate site 080.pdf	

Location (Community Council)	Site Number	Address	Proposed Use	Representor Number	Candidate Site Assessment	Candidate Site Map	Compatible
		Davids			e 080 Land East of Maes Elfed (Partial area).docx Candidate Site Sustainability Appraisals\080 Land East of Maes Elfed (partial area) SA.docx		
St Davids	081	Land East of Maes Elfed, St Davids	Housing	4461	Site Assessments\Site 081 Land East of Maes Elfed.docx Candidate Site Sustainability Appraisals\081 Land East of Maes Elfed SA.docx	Site maps\candidate_site_081.pdf	
St Davids	097	Land adjacent Ysgol Bro Dewi and East of Wyncliffe Cottage), St Davids	Housing	4405	Site Assessments\Site 097 Land adjacent Ysgol Bro Dewi Primary School and East of Wyncliffe.docx	Site maps\candidate_site_097.pdf	

Location (Community Council)	Site Number	Address	Proposed Use	Representor Number	Candidate Site Assessment	Candidate Site Map	Compatible
					Candidate Site Sustainability Appraisals\097 Land adjacent Ysgol Bro Dewi Primary School and East of Wyncliffe SA.docx		
St Davids	099	Land West of Glasfryn Road), St Davids	Housing	4405	Site Assessments\Site 099 Land West of Glasfryn Road.docx Candidate Site Sustainability Appraisals\099 Land West of Glasfryn Road SA.docx	Site maps\candidate site 099.pdf Site maps\amended maps\candidate site 099A.pdf	
St Davids	142	Adjacent Ysgol Bro Dewi), St Davids	Housing	LDP	Site Assessments\Site 142 Land adjacent Ysgol Bro Dewi Primary School.docx Candidate Site Sustainability	Site maps\candidate site 142.pdf	Affordable housing exception site

Location (Community Council)	Site Number	Address	Proposed Use	Representor Number	Candidate Site Assessment	Candidate Site Map	Compatible
					Appraisals\142 Land adjacent Ysgol Bro Dewi Primary School SA.docx		
St Davids	152	Land South of LDP Allocation HA737 Glasfryn Road	Housing	LDP	Site Assessments\Site 152 Land South of LDP Allocation HA737 Glasfryn Road.docx Candidate Site Sustainability Appraisals\152 Land South of LDP Allocation HA737 Glasfryn Road SA.docx	Site maps\candidate_site_152.pdf	Not an allocation
St Ishmaels	034	Land off Trewarren Road adjacent School, St Ishmaels	Housing	4443	Site Assessments\Site 034 Land off Trewarren Road adjacent school.docx Candidate Site Sustainability Appraisals\034 Land off	Site maps\candidate_site_034.pdf	

Location (Community Council)	Site Number	Address	Proposed Use	Representor Number	Candidate Site Assessment	Candidate Site Map	Compatible
					Trewarren Road adjacent school SA.docx		
St Ishmaels	055	Land off Trewarren Road (East of School) and Lindsway Road, St Ishmaels	Housing	3352	Site Assessments\Site 055 Land off Trewarren road (East of School) and Lindsway.docx Candidate Site Sustainability Appraisals\055 Land off Trewarren road (East of School) and Lindsway Road SA.docx	Site maps\candidate site 055.pdf Site maps\amended maps\candidate site 055A.pdf	
St Ishmaels	058	Land rear of Cross Cottage, St Ishmaels	Housing (1 unit)	4454	Site Assessments\Site 058 Land to the rear of Cross Cottage.docx Candidate Site Sustainability Appraisals\058 Land to the rear of Cross Cottage SA.docx	Site maps\candidate site 058.pdf	Below the allocation threshold

Location (Community Council)	Site Number	Address	Proposed Use	Representor Number	Candidate Site Assessment	Candidate Site Map	Compatible
St Mary Out Liberty	145	Rear of Cross Park, New Hedges	Housing	LDP	Site Assessments\Site 145 Cross Park.docx Candidate Site Sustainability Appraisals\145 Cross Park SA.docx	Site maps\candidate site 145.pdf	
Tenby	001	Francis Yard, Tenby	Housing	4428	Site Assessments\Site 001 Francis Yard.docx Candidate Site Sustainability Appraisals\001 Francis Yard SA.docx	Site maps\candidate site 001.pdf	
Tenby	005	Butts Field to Waterwynch Lane, Tenby	Retail/car parks/marina/attractions	4217	Site Assessments\Site 005 Waterwynch.docx Candidate Site Sustainability Appraisals\005 Waterwynch SA.docx	Site maps\candidate site 005.pdf	

Location (Community Council)	Site Number	Address	Proposed Use	Representor Number	Candidate Site Assessment	Candidate Site Map	Compatible
Tenby	056	West of Narberth Road, Tenby	Housing	4440	Site Assessments\Site 056 W of Narberth Road.docx Candidate Site Sustainability Appraisals\056 W Narberth Road SA.docx	Site maps\candidate_site_056.pdf	
Tenby	079	East of Old Narberth Road, Tenby	Housing	4460	Site Assessments\Site 079 E of Old Narberth Road.docx Candidate Site Sustainability Appraisals\079 E Narberth Rd SA.docx	Site maps\candidate_site_079.pdf	
Tenby	112	Bryn Hir, Tenby	Housing	4398	Site Assessments\Site 112 Bryn Hir.docx Candidate Site Sustainability Appraisals\112 Bryn Hir SA.docx	Site maps\candidate_site_112.pdf	

Location (Community Council)	Site Number	Address	Proposed Use	Representor Number	Candidate Site Assessment	Candidate Site Map	Compatible
Tenby	113	Butts Field Car Park, Tenby	Mixed Use (Unspecified)	4398	Site Assessments\Site 113 Butts Field.docx Candidate Site Sustainability Appraisals\113 Butts Field SA.docx	Site maps\candidate site 113.pdf	
Tenby	120	Upper Cwm Park, Tenby	Housing	4479	Site Assessments\Site 120 Upper Cwm Park.docx Candidate Site Sustainability Appraisals\120 Upper Cwm Park SA.docx	Site maps\candidate site 120.pdf	
Tenby	146	Rectory Car Park	Housing	LDP		Site maps\candidate site 146.pdf	
Tenby	147	Reservoir Site	Housing	LDP	Site Assessments\Site 147 Tenby Reservoir.docx Candidate Site Sustainability Appraisals\147 Reservoir	Site maps\candidate site 147.pdf	

Location (Community Council)	Site Number	Address	Proposed Use	Representor Number	Candidate Site Assessment	Candidate Site Map	Compatible
					SA.docx		
Tenby	148	Sergeant's Lane	Mixed commercial/residential	LDP	Site Assessments\Site 148 Sergeants Lane.docx Candidate Site Sustainability Appraisals\148 Sergeants Lane SA.docx	Site maps\candidate site 148.pdf	Not an allocation
The Havens	006	Land at Walton Road, Broad Haven	Housing	3278	Site Assessments\Site 006 Walton Road.docx Candidate Site Sustainability Appraisals\006 Land at Walton Road SA.docx	Site maps\candidate site 006.pdf	Below Allocation Threshold
The Havens	018	Land opposite Heddfan, Little Haven	Housing	4436	Site Assessments\Site 018 Opposite Heddfan.docx Candidate Site Sustainability Appraisals\018 Opp Heddfan SA.docx	Site maps\candidate site 018.pdf	

Location (Community Council)	Site Number	Address	Proposed Use	Representor Number	Candidate Site Assessment	Candidate Site Map	Compatible
The Havens	023	Inglenook Cottage, Walton West	Housing	4440	Site Assessments\Site 023 Inglenook Cottage.docx Candidate Site Sustainability Appraisals\023 Inglenook SA.docx	Site maps\candidate site 023.pdf	
The Havens	027	Penberry, Little Haven	Single House	3251	Site Assessments\Site 027 Penberry.docx Candidate Site Sustainability Appraisals\027 Penberry SA.docx	Site maps\candidate site 027.pdf	
The Havens	039	South-East of Site 041, Broad Haven	Housing/ Affordable Housing	3372	Site Assessments\Site 039 SE of MA776.docx Candidate Site Sustainability Appraisals\039 SE of MA776	Site maps\candidate site 039.pdf	

Location (Community Council)	Site Number	Address	Proposed Use	Representor Number	Candidate Site Assessment	Candidate Site Map	Compatible
					SA.docx		
The Havens	040	Off Marine Road, Broad Haven	Mixed use/ Housing/ Affordable Housing	3372	Site Assessments\Site 040 Off Marine Road.docx Candidate Site Sustainability Appraisals\040 off Marine Rd SA.docx	Site maps\candidate site 040.pdf	
The Havens	041	North-East of Marine Road, Broad Haven	Housing/ Affordable Housing	3372	Site Assessments\Site 041 NE Marine Road.docx Candidate Site Sustainability Appraisals\041 NE Marine Rd SA.docx	Site maps\candidate site 041.pdf	
The Havens	073	East of Walton Road, Broad Haven	Housing	4456	Site Assessments\Site 073 E Walton Road.docx Candidate Site Sustainability Appraisals\073 E Walton Road SA.docx	Site maps\candidate site 073.pdf	

Location (Community Council)	Site Number	Address	Proposed Use	Representor Number	Candidate Site Assessment	Candidate Site Map	Compatible
The Havens	084	North of Walton Hill, Little Haven	Housing/ Affordable Housing	4463	Site Assessments\Site 084 N Walton Hill.docx Candidate Site Sustainability Appraisals\084 N Walton Hill SA.docx	Site maps\candidate site 084.pdf	
The Havens	094	Walton West Farm	Housing	4469	Site Assessments\Site 094 Walton West Farm.docx Candidate Site Sustainability Appraisals\094 Walton West Farm SA.docx	Site maps\candidate site 094.pdf	
The Havens	098	Yard, Walton West, Little Haven	Housing	4469	Site Assessments\Site 098 Yard.docx Candidate Site Sustainability Appraisals\098 Yard SA.docx	Site maps\candidate site 098.pdf	