

Pembrokeshire Coast National Park

Replacement Local Development Plan (end date-2031)

Replacement Preferred Strategy

Draft Initial Sustainability Appraisal Report

PEMBROKESHIRE COAST NATIONAL PARK AUTHORITY

May 2017

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1 Summary and key outcomes

Context

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

Health Impact Assessment Screening

1.2 HIA screening, conducted as part of the Local Development Plan (Replacement Plan) production process, can identify specific impacts on, or implications for, certain people's health and well-being as a result of the Local Development Plan (Replacement Plan) policies. The following outlines the work done by the Authority to date, taking account of available guidance¹.

1.3 The detailed appraisal of policy options (Appendix B), which tests each option against a number of Sustainability Appraisal Objectives has been formulated over multiple National Park Officer meetings. The appraisal includes Sustainability Objectives such as:

- Objective 2. Locate developments so as to minimise the demand for travel, especially by private car;
- Objective 8. Maximise the contribution of the limited opportunities for development to sustaining local communities;
- Objective 9. Encourage access for all to the National Park, reflecting the social mix of society;
- Objective 10. Maintain the cultural distinctiveness of communities;
- Objective 13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population.

1.4 The assessment of the Local Development Plan policy options has therefore included potential health impacts at a broad strategic level. No significant health impacts or implications, that would require further assessment, have been identified as a result of this process to date.

1.5 This Sustainability Appraisal will form part of the Preferred Strategy consultation, which will include bodies such as the Hywel Dda University Health Board and Pembrokeshire Association of Voluntary Services and 'Key Stakeholders' and those bodies identified within the 'Seldom Heard' consultation group².

1.6 Should a specific issue be raised as a result of engaging with key stakeholders and the public, further Desktop or Rapid HIA on that issue can be conducted to inform the Deposit Plan preparation.

1.7 The Equality Impact Assessment will also provide an opportunity to identify any health related issues that require addressing.

Sustainability Objectives

1.8 For the purposes of the Sustainability Appraisal of the Pembrokeshire Coast National Park

¹ Public Health Wales, Cardiff University, Wales Health Impact Assessment Support Unit 'Health Impact Assessment: A Practical Guide'.

² Pembrokeshire Coast National Park Local Development Plan – Replacement Plan (2015-2031): Delivery Agreement July 2016, Appendix 4 Consultation Groups.

Replacement Local Development Plan Preferred Strategy, in accordance with guidance from the Welsh Government 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.

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

What would happen in the absence of the Local Development Plan?

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

Appraisal of Replacement Local Development Plan Vision, Objectives, Policy Options and Detailed Policies

- 1.11 This Initial Sustainability Appraisal has been carried out on a replacement preferred strategy and not an entirely new preferred strategy. As a result the appraisal work herein builds on the work already carried out for the current adopted plan. Assessment of the vision, objectives, policies and policy options has been revisited and refreshed and some new policy options have been considered for inclusion as either new policies or components of detailed policies.
- 1.12 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.
- 1.13 The policy options for the Replacement Local Development Plan Preferred Strategy were assessed for impacts against the Sustainability Objectives and recommendations upon which options to take forward wholly or as components of detailed policies were made. In most cases these have been incorporated into the plan, with some exceptions see section 5.
- 1.14 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.
- 1.15 Sustainability Appraisal has been part of the process for creating the Local Development Plan from the start (2007). Many of the components of the plan remain largely unchanged in the replacement Preferred Strategy and these components have already been subject to a full Sustainability Appraisal process. As a result there are very few recommendations arising from the Sustainability Appraisal process for the Replacement Local Development Plan thus far.

What will be the cumulative impacts of the Plan's proposals?

- 1.16 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?

- 1.17 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.

- 1.18

How are Policies chosen for the Plan?

1.19 Where a choice of policy options were considered for the first Local Development Plan the most sustainable policy option was chosen. For this replacement Local Development Plan where there is a choice the optimum policy position is chosen taking account of the findings of the sustainability appraisal and assessing the policy against the soundness tests. This may mean that in some instances the most sustainable policy option is not chosen. The Alternative Options and Appraisal Background Paper provides more advice on this.

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2 Appraisal Method

2.1 Sustainability Appraisal is a statutory requirement for Local Development Plans under Section 62(6) of the Planning and Compulsory Purchase Act 2004. The purpose of Sustainability Appraisal is to assess the social and economic effects of the component policies, proposals and strategy elements of the Local Development Plan to ensure that decisions accord with the principles of sustainable development.

2.2 Accordance with the sustainable development principle is defined in the Well-being of Future Generations Act (Wales) 2015:

“In this Act, any reference to a public body doing something “in accordance with the sustainable development principle” means that the 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” (Section 5:Sustainable Development Principle (1)).

2.3 The Welsh Government define sustainable development in Wales through the Well-being of Future Generations (Wales) Act 2015 as:

“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” (a more comprehensive description of the Act, its goals and how the Sustainability Objectives contribute to them can be found in Section 5 of the Sustainability Appraisal Scoping Report (June 2016).

2.1 For the purposes of land use planning, the Planning (Wales) Act 2015 performs a function as part of carrying out sustainable development in accordance with the Well-being of Future Generations Act (Wales) 2015:

“...for the purpose of ensuring that the development and use of land contribute to improving the economic, social, environmental and cultural well-being of Wales” (Part 2 Sustainable Development, 2(2)).

2.2 Guidance provided by the Welsh Government on the Preparation of Local Development Plans indicates that a Sustainability Appraisal must integrate the requirements of the Strategic Environmental Assessment Regulations. The requirements of EU Directive 2001/42/EC (also known as the SEA Directive) have been transposed into Welsh Law through The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004. Strategic Environmental Assessment requires the formal assessment of certain plans and programmes that are likely to have significant effects on the environment; this includes Local Development Plans.

2.3 Sustainability Appraisal is an iterative process; this means that assessment will be carried out at the earliest opportunity on emerging strategy and policy to ensure that the development of the replacement Local Development Plan is informed by the process throughout. The Local Development Plan Manual (Second Edition, 2015) states that “Sustainability appraisal and Strategic Environmental Assessment will play an important part in demonstrating that the LDP is sound by ensuring that it reflects sustainable development objectives. It will contribute to the reasoned justification of policies”.

Components of the Sustainability Appraisal

2.4 The stages to Sustainability Appraisal are as follows:

- i. Scoping - setting the context and objectives, establishing the baseline and deciding on the scope;
 - ii. Assess the Local Development Plan (Preferred Strategy) strategic options against the Sustainability Objectives and produce Sustainability Appraisal Report;
 - iii. Assess the Deposit Local Development Plan policies against the Sustainability Objectives and produce Sustainability Appraisal Report;
 - iv. Produce a Sustainability Statement stating how the findings of the Sustainability Appraisal have been taken into account in the final Plan
- 2.4 The scoping stage was completed in June 2016. The completed scoping report can be obtained from the offices of the Pembrokeshire Coast National Park Authority, or from its web site, www.pembrokeshirecoast.org.uk. The key findings of the scoping process, the sustainability issues and the Sustainability Objectives against which the Management Plan and Local Development Plan were appraised, are included in this report.
- 2.5 The second stage was carried out between Jun 2016 and January 2017 during the process of reviewing the objectives, policy options and detailed policies (see paragraph 1.17) for the Replacement Local Development Plan Preferred Strategy. This report documents that process and presents the findings.
- 2.6 A full timetable for the Local Development Plan processes can be found in the Delivery Agreement.
- 2.7 The Sustainability Appraisal is being undertaken internally by officers of the National Park Authority as part of the Plan making process.
- 2.8 The policy options were appraised against each of the Sustainability Objectives using the matrix tables shown in appendix B. Options were presented as sets of mutually exclusive alternatives or single options. From this an overall assessment of the each policy option was derived, and a recommendation made as to which options should be carried forward, which discarded, and which should be amended to avoid negative impacts, or increase their beneficial effects.
- 2.9 The policies in the Replacement Local Development Plan Preferred have in large part been developed from the preferred policy options considered in this report. Each of the policies has been assessed against the 15 Sustainability Appraisal Objectives, the detailed assessment matrices for the policies can be found in Appendix A.
- 2.10 The Strategic Environmental Assessment directive requires that authorities '*which, by reason of their specific environmental responsibilities, are likely to be concerned by the environmental effects of implementing plans and programmes*' be consulted on the scoping process of the assessment. European Union member states are required to identify such authorities as designated consultation bodies. In Wales the designated consultation bodies are the Natural Resources Wales and CADW.
- 2.11 The designated consultation bodies, and the public were consulted on the scoping report for the Sustainability Appraisal between 16th March 2016 and 18th May 2016. The reports of these consultations and the final scoping report can be viewed on the Pembrokeshire Coast National Park Authority [web site](#)³.
- 2.12 The Strategic Environmental Assessment directive requires that the designated consultation bodies and the public be consulted on the environmental report. This report of the Sustainability Appraisal is that Environmental Report. Consultation on the report of the Sustainability Appraisal

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<http://www.pembrokeshirecoast.org.uk/Files/files/Dev%20Plans/LDP2/SA/Final%20Sustainability%20Appraisal%20Scoping%20Report.pdf>

of the Pembrokeshire Coast National Park Replacement Local Development Plan Preferred strategy will take place at the same time as the consultation on the draft Replacement Local Development Plan Preferred Strategy. Eight will be allowed for the consultation.

- 2.13 The principle difficulty in carrying out the Sustainability Appraisal has been the lack of information and understanding of many of the issues of interest, combined with large volumes of information and data for others. The problems associated with lack of information are clear, but too much information is also a problem for Sustainability Appraisal as the time and resources are not available to find, process and evaluate the information to ensure that the best information is included in the appraisal.
- 2.14 The problem of lack of relevant information is further aggravated in National Parks as the geography at which much information and data are published does not match or nest within the National Park. This means that information used in the Sustainability Appraisal often refers to the Local Authority area of which the National Park is a part, even though it may not always be appropriate to assume that the two areas are equivalent with regard to the data or information in question.
- 2.15 The lack of quality information on all issues for the National Park area carries with it two key risks for the Sustainability Appraisal:
- i. it will not be possible to confidently predict the impacts of the Plans in all cases, and may not be possible to accurately monitor the effects of implementing the Plans;
 - ii. what is measured, or easily measurable, will define what is important in the Sustainability Appraisal. In other words, issues for which no good evidence exists become less important, or even fail to feature, in the Sustainability Appraisal, even when the majority of stakeholders would agree they are real and important.
- 2.16 The Pembrokeshire Coast National Park Authority has attempted to deal with the second risk by consulting external organisations and officers of the Authority in order to identify sustainability issues, as well as identifying issues emerging from the baseline information gathered. The first risk is more difficult to deal with as it will require changes in the geographies at which data and information are disseminated, which may not always be possible due to risk of disclosure of personal and sensitive information, or because the data may not be statistically valid for small areas; or will require new data gathering systems and projects, which are likely to involve substantial resources.

3 Background

- 3.1 Sustainability Appraisal is mandatory for Local Development Plans under the Planning and Compulsory Purchase Act, 2004. The purpose of Sustainability Appraisal is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of Local Development Plans
- 3.2 European Union Directive 2001/42/EC on "the Environmental Assessment of Plans and Programmes" requires that a Strategic Environmental Assessment (SEA) be carried out for land use plans and programmes likely to have a significant effect on the environment. The Pembrokeshire Coast National Park Local Development Plan is such a plan and is therefore subject to Strategic Environmental Assessment.
- 3.3 This report documents the Sustainability Appraisal and its incorporated Strategic Environmental Assessment.
- 3.4 The Local Development Plan is subject to National Park purposes:
- 'to conserve and enhance the natural beauty wildlife, and cultural heritage of the National Parks.'*
- 'to promote opportunities for the understanding and enjoyment of the special qualities [of the Parks] by the public.'*
- 3.5 These are underpinned by the Sandford Principle which asserts the primacy of the first purpose over the second in cases of obvious conflict. Reflecting that National Parks are cultural landscapes with a resident population, the Authority also has a duty in taking forward the park purposes to: *'foster the economic and social well-being of local communities, within the National Park....'*. This duty should be fulfilled in the pursuit of National Park purposes.
- 3.6 The Replacement Local Development Plan Preferred Strategy contains a vision for the National Park in 2031 (the end of the Plan period) and Objectives for key outcomes during the life of the Local Development Plan. The vision and objectives are derived from the common vision and objectives developed for the Management Plan and the original Local Development Plan Preferred Strategy. The vision contained in the Deposit Local Development Plan for the National park in 2031 is:

Development continues to respect and where possible enhance the special qualities. This means that the Park's population will not be able to increase significantly. The limited opportunities for development that can be made available are wherever possible made available for development that contributes most to sustaining local communities where compatible with the statutory National Park purposes.

Tenby, Newport, Saundersfoot, St Davids and many of the National Park's more rural communities have accommodated additional growth in housing in order to facilitate the delivery of affordable housing for the communities of the National Park. Employment development has been focussed 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.

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

In common with the rest of the United Kingdom, the Park has been adapting to the changing climate. Development is more sustainable in design. There is, in new development, a distinctive but subtle vernacular building style that combines the best

of the old with the best of the new. Renewable energy generation schemes are more popular. Development has been directed away from areas that are or will be prone to inundate or flood.

The Park benefits from being an unbeatable socially inclusive year-round visitor destination concentrating on its strengths: low impact marine and coastal recreation, access to wildlife-rich countryside, and peace and quiet.

3.7 The objectives for the Local Development Plan are:

Special Qualities

Historic Environment

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

Biodiversity and Geodiversity

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

Landscape and Seascape

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

Welsh Language and Culture

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

Major development, the potential for growth

Scale and Location of Growth

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

Minerals

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

Waste

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

Ministry of Defence

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

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.

Renewable Energy

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

Soil, Air and Water Quality

- To safeguard and enhance the soil, air and water quality of the National Park.

Sustainable Design

- 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.

Coastal Management

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

Flooding

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

Visitor economy, employment and rural diversification

Employment

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

Enjoyment

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

Affordable housing and housing growth

Housing

- To provide for housing to facilitate the delivery of affordable housing needs without compromising National Park purposes.

Community facilities

Community Facilities

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

Retail

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

Transport

- To improve and promote accessibility by appropriate means and at appropriate times for the people who live, work, rest and play in the National Park whilst reducing the need to travel by private car.

Utilities

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

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

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

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

Strategic Environmental Assessment Directive issue	Sustainability Objective(s)#
Biodiversity	1; 6; 11; 14
Population*	2; 6; 8; 10; 13; 15
Human health	2; 4; 6; 9; 12; 13; 15
Fauna	1; 6; 11; 14
Flora	1; 6; 11; 14
Soil	1
Water	1; 12; 15
Air	2; 7
Climatic factors	2; 6; 7
Material assets*	3; 6; 13; 15
Cultural heritage (including architectural & archaeological heritage)	1; 3; 8; 10
Landscape	1; 3; 11; 12; 14; 15

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

4 Sustainability context, baseline & objectives

Other relevant policies, plans and programmes

4.1 The key Plans that will affect the context and implementation of the Pembrokeshire Coast Local Development Plan are the National Park Management Plan, Wales Spatial Plan and the Development Plans of neighbouring Local Authorities⁴. The significant elements of the Local Development Plan's interaction with these Plans and the way the implications of these interactions are taken into account is discussed in some detail in this section. There are many other Policies, Plans and Programmes that have informed the development of the Plans, or parts thereof, these are documented in Appendix C.

The Wales Spatial Plan

4.2 The preferred policy options and resulting policies for the Pembrokeshire Coast National Park Replacement Local Development Plan Preferred Strategy adopt the key settlement hierarchy set out in the Wales Spatial Plan Pembrokeshire Haven Key Settlement Framework 2021.

4.3 The Sustainability Appraisal of the Wales Spatial Plan⁵ identifies a number of overall mitigation measures to ensure that any negative impacts of the Key Settlement Hierarchy are minimised or avoided, and the potential benefits are maximised in the Pembrokeshire - Havens Wales Spatial Plan area. These are:

- i. Ensure brownfield land use is maximised;
- ii. Ensure service and employment centres are well served by public transport and non-motorised transport networks;
- iii. Consider development of an incentive scheme for public transport users;
- iv. Encourage higher density, mixed use development and co-location of housing and employment wherever possible;
- v. Consider development of design guidance to ensure developments reflect local character and distinctiveness;
- vi. Ensure commitment to meet BREEAM 'very good' or 'excellent' standards (to ensure energy efficiency through design and operation; reuse of existing façades, structures, materials; provision of waste recycling facilities, etc.);
- vii. Ensure that sustainable construction techniques are employed in all new development;
- viii. Ensure that new development is sited to minimise exacerbation of flood risk, particularly from run-off;
- ix. Promote the use of Sustainable Urban Drainage Systems where appropriate.

4.4 There are further, more detailed, mitigation measures, considered under specific topic areas (economy; housing; environment; transport; town centre redevelopment; energy; and tourism). For the most part these are contained within the overall measures listed above, though some

⁴ Pembrokeshire, Carmarthenshire & Ceredigion.

⁵ Support for the SA/SEA of the Wales Spatial Plan Update. Swansea Bay, Pembrokeshire and South East Wales Area Actions. May 2007. Final Report Volume 1: Main report. Produced by ATKINS for the Welsh Government.

extend the scope of these measures:

- i. Measures relating to transport infrastructure consider access to tourism/ recreation destinations as well as to developments.
- ii. Design and siting of development takes into account the impact on the whole landscape, not just the character of the built environment, and a comprehensive landscape character assessment be used to underpin landscape conservation & management.
- iii. Habitat creation (e.g. tree planting and green roofs) is considered as part of a sustainable design approach

4.5 Additionally from the more detailed measures emerges another overall mitigation measure:

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

4.6 The following paragraphs review how the policies in the Pembrokeshire Coast National Park Local Development Plan may implement the mitigation measures for the Key Settlement Hierarchy adopted from the Wales Spatial Plan.

Ensure brownfield land use is maximised

4.7 Policy options to protect the landscape and townscapes of the National Park are likely to result in preferential development of brownfield sites (largely by reducing the potential for development on greenfield sites). The criteria for identifying potential development sites consider whether there are sufficient brownfield opportunities in the vicinity such that it is unnecessary to develop a green field site. However, the buoyant property markets in the National Park, at least until 2008 mean that many redevelopment opportunities in the National Park have already been developed, or have Planning Permission.

4.8 Other policies in the Local Development Plan focus development towards brownfield sites. Policy 37 restricts development of self-catering visitor accommodation to brownfield sites in centres in certain circumstances; retail policies (49 and 50) promote regeneration of existing retail centres (rather than development of new out of centre retail facilities).

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

4.9 Policy 52 seeks to improve the quality of public transport services and provide alternatives to the private car in developments. Policy 53 prevents development which would result in increased volumes of traffic in congested areas. The settlement framework of the Local Development Plan aims to direct development to the most accessible locations and where services are available to minimise the need to travel.

Consider development of an incentive scheme for public transport users

4.10 Policy 52 allows facilities to improve the quality of public transport services.

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

4.11 Policy 42 allocates sites for a combination of employment, housing and community facility uses. Policy 44 requires a minimum density of 30 dwellings per hectare on housing developments in identified centres where this is compatible with the character of the centre.

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

- 4.12 The definition of Sustainable Design in policy 29 includes reference to place and local distinctiveness.
- 4.13 Policy 14 requires that important traditional features are retained or incorporated in developments
- 4.14 National Park purposes (policy 1) and policy 8 on the National Park's special qualities will further ensure that developments reflect local character and distinctiveness.

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

- 4.15 Resource efficiency requirements for buildings, as of 31st July 2014, are now covered by Welsh Part L of the Buildings Regulations. These requirements cover both domestic and non-domestic buildings (where BREEAM only covered non-domestic) and are subject to review to improve efficiency requirements in the future.

Ensure that sustainable construction techniques are employed in all new development

- 4.16 Policy 29 requires resource efficiency and waste minimisation in construction.

Habitat creation in design of developments

- 4.17 Policy 29 requires development to be well designed in terms of biodiversity and the environment.
- 4.18 Policy 8 aims to ensure that the Park's ecosystems are restored and enhanced, and the pattern and diversity of the landscape is protected and enhanced.

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

- 4.19 Policy 34 directs development away from areas at risk of flooding, either now or as predicted for the future
- 4.20 Policy 32 requires Sustainable Drainage Systems on developments.

Promote the use of SUDS where appropriate.

- 4.21 Policy 32 requires Sustainable Drainage Systems on developments.

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

- 4.22 Policy 8 requires that ecosystems are protected and enhanced, connectivity is maintained or created.
- 4.23 Policy 29 includes biodiversity in its definition of good design
- 4.24 Policies 10 and 11 protect sites of local conservation interest, and species and habitats more widely

Neighbouring Authorities' Development and Well-being Plans

- 4.25 The Pembrokeshire Coast National Park Replacement Local Development Plan will interact significantly with the emerging Well-being Plan for Pembrokeshire and the Development Plan for that area of Pembrokeshire not within the National Park. Pembrokeshire County Council provides all key local authority services, other than planning, for the National Park. A number of settlements straddle the Park border and are therefore planned for by both Authorities. Additionally the most urbanised area of the National Park (the area of Tenby and Saundersfoot) also has locally significant settlements in close proximity outside the boundary.
- 4.26 Therefore it is the case that when planning for an appropriate scale of growth and allocating sites for development, the outcome in many places will be the result of a combination of the Development Plan for the National Park and that for the area of Pembrokeshire outside the National Park. Circumstances might arise where each authority plans for an appropriate level of growth in a settlement, but together their plans result in an unacceptable level of growth across the whole settlement, or between neighbouring settlements on either side of the boundary. In order to address this issue, when assessing the suitability of potential development sites (particularly with reference to Sustainability Appraisal and Habitats Regulations Assessment) the location and scale of neighbouring Authorities' development allocations⁶, and the cumulative growth that may occur, has to be considered.
- 4.27 Another key interaction between the Plans for the National Park and the area of Pembrokeshire outside the National Park is the way they complement each other in terms of what they provide for the people of Pembrokeshire. The area outside the National Park tends to provide more new housing, employment and retail opportunities; whilst the National Park provides a greater proportion of the recreational opportunities for the people of Pembrokeshire than might be predicted purely on the basis of relative population. This situation reflects the Protected Landscape status of the National Park and the dual purposes of the National Park of conservation and enjoyment. The Wales Spatial Plan update refers to continuing the approaches set out in the respective Unitary Development Plans for the area, where there is a continued emphasis on the urban corridor in Pembrokeshire. Similarly, the coastal and rural nature of the Park means that it has much to offer in recreation terms and will attract people from all over the county.
- 4.28 The down side of this complementarity is that is likely to lead to increased travelling. Some people will travel to employment related to recreation in the Park from homes outside the Park, whilst others will travel from homes in the Park to work outside. The main driver for travel though is likely to be people travelling to the Park for recreation, and this will grow as the population of the area outside the Park grows relative to that inside. Given that the National Park is an attractive place to visit, people from other parts of Pembrokeshire, and beyond, will want to, and should be able to, visit it. Therefore, this travel is inevitable and even desirable. In order for it to also be sustainable it is important that visitors use more sustainable modes of transport such as buses or cycling to get to and around the National Park. The Plans contain policies to encourage this behaviour, and discourage the currently preferred mode of transport, the private car.

⁶ As set out in their Local Development Plans

Social, environmental and economic baseline

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

Data limitations

- 4.32 Collection of baseline data for Sustainability Appraisal is subject to three difficulties:
- i. The data for an issue of interest may not be available or not have been collected.
 - ii. Timeliness of data - the only data available for an issue may be unacceptably out of date. Alternatively current data may be available, but there are no historic datasets to identify trends.
 - iii. The geography at which the data is collected or published - the finest geographical resolution for which data on most issues is published is local authority or ward. Few datasets are published for National Park areas. Even the finest resolution data generally available (data for Census Output Areas) does not cover areas that conform to the National Park boundary. Data geographies also change over time (e.g. the finest resolution of data published for the 1991 and 2011 Censuses). Therefore it is often necessary to use interpolation or other estimation techniques to derive data for the National Park area, or use data that describes a wider area.
- 4.33 Furthermore, most of the data used in the baseline has been collected by external bodies, and for purposes that may not be related to sustainability or environmental assessments.
- 4.34 The limitations of the data will have implications for the conclusions that can be drawn from the baseline and monitoring the Plan and Appraisal. These conclusions should therefore also refer to qualitative information and expert judgement and experience.

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

- 4.35 Guidelines for Sustainability Appraisal and the Strategic Environmental Assessment Directive require that the appraisal includes a forecast of the likely sustainability outcomes in the absence of the Plan – the 'business as usual' scenario. Understanding the likely future evolution of the area in the absence of the Plan is important for determining the impact of the Plan. Also, if the Plan outcomes were forecast to be no better, or worse, than the business as usual scenario, this would provide a clear indicator that the Plan needed significant improvement.
- 4.36 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.
- 4.37 The sustainability effects of this interpretation are forecast in the table below in the context of the Sustainability Objectives. The Sustainability Objectives have been chosen as a context for this exercise because: they provide the context against which the likely effects of the Plan have

been assessed; and they provide the proposed framework for sustainability monitoring.

	Sustainability Objective	Forecast in the absence of the Plan
		Adopted Local Development Plan (end date 2021)
1.	Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well-being.	<p>The Adopted Local Development Plan sets out policies for the protection of landscape, biodiversity, the development of rural enterprise dwellings, conversion of buildings, farm diversification and One Planet Development.</p> <p>This restricts development generally in the countryside save providing certain opportunities for development.</p> <p>When the plan ends national planning policy would continue to restrict development in the countryside and therefore the opportunities for farmers and land owners to use their land for purposes other than farming. National Planning Policy also provides the Framework for One Planet Development, and would allow these developments to continue to come forward.</p> <p>Also by applying just the provisions of national planning policy for conversion would provide for different types of development being permitted. Again this would be a small change in the contribution it would make.</p> <p>Landscape quality and biodiversity are likely to decline more than if the Plan was not in place. This is likely because the landscape and biodiversity policies of the plan provide additional policy guidance which is amplified through the preparation of supplementary planning guidance.</p>
2.	Locate developments so as to minimise the demand for travel, especially by private car.	<p>Trends in car travel show a steady increase for Great Britain as a whole and Pembrokeshire. National policy and other external factors, such as oil prices, may curtail or reverse this trend, but car use has continued to grow in recent years in spite of rising fuel prices.</p> <p>The spatial strategy of the Adopted Local Development Plan and national policy seek to concentrate development in main settlements, with an aim to reduce car travel.</p> <p>When the plan ends if speculative development is permitted in the absence of a key settlement strategy then, car use is likely to continue to increase more than it would in the absence of such a strategy.</p>
3.	Conserve and enhance landscapes, townscapes and seascapes, and all their components (including the built environment and archaeology) with reference to the special qualities of the National Park	<p>Please see comment in terms of landscape against raised in relation to objective 1. In terms of townscapes, additional guidance is provided on Conservation Areas and development within them as supplementary planning guidance to the Plan.</p> <p>In terms of the development itself lack of the additional guidance could well mean that development is more likely to damage than protect or enhance.</p>
4.	Increase the number of residents and visitors taking part	An issue primarily for the Management Plan. But in land use planning terms there are policies for the protection of open space, protection of the environment and traffic management to encourage the use of alternative forms of transport.

	Sustainability Objective	Forecast in the absence of the Plan
		Adopted Local Development Plan (end date 2021)
	in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	A loss of plan strategy and policy is likely to see some erosion of that protection and encouragement and would therefore be less likely to provide opportunities to contribute here.
5.	Increase the number of visitors using the National Park outside the peak visitor season.	<p>The Adopted Plan encourages increasing the number of visitors outside the Peak season through permitting additional tourist attractions, additional serviced accommodation, seeking to retain hotels and guest houses, encouraging some self-catering and limited upgrading for tents and caravans.</p> <p>The range of policies which provide more detail than national planning policy would help provide a landuse framework for increasing numbers out of peak season. The absence of these policies would not seem to help with this objective as proposals would have to be judged on their individual merit without any clear strategy direction to increase visitor numbers outside peak season.</p>
6.	Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	The Adopted Local Development Plan includes a policy identifying circumstances where the sustainable defence of the coast is allowed and it covers issues such as acknowledging natural process and visual impact. This policy would continue in the Replacement Plan for a further 10 years. Whether in the presence or absence of a Development Plan TAN 15 will provide detailed guidance.
7.	Reduce factors contributing to climate change.	<p>The main sources of Carbon Dioxide in the National Park domestic and commercial combustion, industrial combustion and road transport.</p> <p>See comment on objective 2 regarding travel.</p> <p>Policy 29 promotes sustainable design principles in all new development. Relying on National Policy and building regulations alone may result in a less integrated sustainable design approach for new development in the National Park.</p>
8.	Maximise the contribution of the limited opportunities for development to sustaining local communities.	<p>The Adopted Local Development Plan provides for employment generation locally, the protection and enhancement of community facilities, the protection of employment sites and local hotels as employers in the local area, the protection of recreational open spaces, keeping the town centre and local shopping areas vibrant and focuses affordable housing provision to meet identified needs. Where policies allocate land for these developments or there are proposals for their protection unless circumstances indicate otherwise then this does assist in their prioritisation.</p> <p>In the absence of these policies what opportunities for development there are more likely to serve 'external interests', (for example more expensive housing or the reuse of a pub as a second home), better than they do the local communities.</p>

	Sustainability Objective	Forecast in the absence of the Plan
		Adopted Local Development Plan (end date 2021)
9.	Encourage access for all to the National Park, reflecting the social mix of society.	The Policies for community facilities, affordable housing etc. listed under Objective 8 (above) help to progress this objective beyond the statutory requirements. Progress in the absence of these policies would be much reduced in the absence of the Plan.
10.	Maintain the cultural distinctiveness of communities.	Policies of the Local Development cover issues in relation to Welsh language, protection of the historic environment, the provision of affordable housing. Land use planning can only have a limited impact. In the absence on the Plan there would still be the protection of the historic environment through the various designations. There may be some decline in the absence of the Plan but this is difficult to quantify.
11.	The adverse effects of minerals exploitation in the National Park decline from the present level and the potential biodiversity and landscape gains of former minerals sites are realised.	<p>The current Local Development Plan and national policy only allows minerals development in National Parks in exceptional circumstances.</p> <p>Without the Plan there is detailed guidance within national planning policy which could be relied upon.</p>
12.	Reduce the negative impacts of waste.	<p>Land use planning can only deal with the consequences of demand arising and how they are dealt with in land use planning terms. Within that context the Local Development Plan the National Park is not proposed for the disposal of waste to land, or the disposal of hazardous waste, the disposal of inert waste. The Park allows for recycling and civic amenity sites and composting which would contribute to this objective.</p> <p>In the absence of this Plan and clear strategy for the disposal of waste generally in the area then this co-ordinated approach would not be as effective and the Authority would have more difficulty in dealing with speculative applications.</p>
13.	Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	The Adopted Development Plan contains a policy to protect against the loss of community facilities and retail units, so as long as that Plan remains influential, loss of facilities should be avoided.
14.	Maintain and enhance biodiversity both within and outside	See response to objective 1.

	Sustainability Objective	Forecast in the absence of the Plan
		Adopted Local Development Plan (end date 2021)
	designated sites	
15.	Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	<p>The Adopted Local Development Plan sets out policies on the protection of waterways the undeveloped coast, environmental designations and sustainable building design. Allocations are made in consultation with Natural Resources Wales and Dwr Cymru/Welsh Water.</p> <p>In the absence of a Plan these issues would be covered by National Planning Policy and Buildings Regulations. The main risk for the absence of a plan would be that Authority would have to deal with speculative applications where the potential for adverse impact increases through ad hoc decision making in the absence of a clear strategy.</p>

Sustainability Issues

4.38 The following resources were used to identify Sustainability Issues:

- The Policies, Plans and Programmes relevant to the Local Development Plan;
- The baseline information gathered;
- The experience of officers in the National Park Authority of issues faced when working on behalf of the Authority;
- The Monitoring of the Local Development Plan and Sustainability Appraisal over the last 5 years.

4.39 The issues identified through the above process are summarised in the table below. Many of the issues are the same as those identified during the preparation of the adopted Local Development Plan but have been checked and updated with current data where it has become available. No new issues have been identified through the monitoring process; copies of the Local Development Plan Annual Monitoring Report are available from Pembrokeshire Coast National Park Authority's [website](#)⁷.

Number	Issue	Description
1	Effects of Climate Change	It is likely that climate change will have significant effects on the National Park, though the nature and scale of those effects is uncertain. The report Wales: Changing Climate, Challenging Choices prepared for the National Assembly for Wales, predicts for 2080 average temperature increases for Wales of up to 2.9°C; an increase in annual precipitation of up to 9%; and a rise in sea level of up to 79cm, accompanied by more frequent and violent storms. Climate change is

⁷ Local Development Plan Annual Monitoring Reports:
<http://www.pembrokeshirecoast.org.uk/default.asp?PID=536>

Number	Issue	Description
		likely to impact on economic activity (e.g. changes to farming, impact on coastal activity), biodiversity (e.g. movement of species & habitats), health (e.g. heat stress, disease) and the historic environment (e.g. flooding and storm damage).
2	Impact of recreation and tourism, and associated development	<p>Great importance should be attached to the role of the National Park for tourism and recreational activities. They are beneficial to the local economy, and to the nation in terms of health and well-being. However, in some instance, there can be negative impacts of these activities including traffic congestion, disturbance from activities such as jet skiing, and increased demands on the public service infrastructure. Tourism is sometimes a driver for inappropriate development proposals in the National Park. Where there are negative impacts of tourism activity, these impacts can be felt by the environment and the resident population, and can diminish the quality of the tourism experience itself. It is also recognised that the tourism industry can also contribute positively to both the environment and resident population.</p> <p>While the impact of tourist and recreational users is not as great in the Pembrokeshire Coast National Park as in some other National Parks, there are times and places at which the large amounts of tourism activity are a problem. The South West Wales Coastal Recreation Audit (2004) identifies 24 hotspots (sites where very high numbers of people present; and/or there are negative impacts on nature conservation designations; and/or there is conflict between different groups of users) in the National Park.</p>
3	Limited landscape capacity to accommodate development	<p>Both Mr P.J. MacDonald in his Inspector's Report on the Pembrokeshire Coast National Park Local Plan (paragraph 4.14) and Mr J.R. Collyer in his Inspector's Report on the Joint Unitary Development Plan for Pembrokeshire (paragraph 4.8.1) highlight the limited capacity of the National Park landscape to accommodate new development, the special status of the National Park, and the importance and appropriateness of policies to restrict development in the National Park. This limited capacity for development is likely to constrain the options available to meet other sustainability objectives and objectives for the Local Development Plan.</p>
4	Dependence on private cars	Pembrokeshire is a rural area so it is inevitable that a large proportion of journeys need to be made by road

Number	Issue	Description
		<p>in private transport. The National Atmospheric Emissions Inventory data for oxides of Nitrogen and Carbon Monoxide emissions show a strong correlation between emissions and the location of main roads suggesting that road transport causes pollution both locally and globally.</p> <p>Responses to the 2011/12 Pembrokeshire Visitor Survey indicate that around 98% of Pembrokeshire's visitors travel by private car. The presence of large numbers of cars, whether in car parks or on roads has a negative impact on air quality, landscape, biodiversity, and also the recreational experience. Offering limited alternatives to travel by private car can contribute to social exclusion of residents and visitors.</p>
5	The physical environment	<p>Air quality in the National Park is generally high though there are pollution hotspots related to road traffic. River quality is generally good, though a number of the National Park's rivers, including the Gwaun and Solva, and its coastal waters are classed as at risk or probably at risk (from diffuse and/or point source pollution; physical alteration; and/or alien species) by the Natural Resource Wales under the Water Framework Directive. Fly tipping, and roadside and seaborne litter are the most significant waste issues for the National Park.</p>
6	Reconciling energy development with landscape considerations	<p>The Milford Haven waterway has an established energy industry, with further developments under construction or planned. Though mostly outside the National Park, this development has significant impact on the landscape of the Park due to its scale and visibility, and that of the associated shipping activity. Pembrokeshire has high potential for renewable energy development, both on shore and offshore using wind, tide and wave energy sources, solar and biomass. However, these developments can have serious landscape impacts either as a result of the generating facility directly or support facilities.</p>
7	Role of agriculture (and other land based businesses)	<p>Agriculture and related activities (such as forestry) have been instrumental in shaping the National Park landscape and can continue to maintain and enhance that landscape and its associated biological and cultural diversity. Agriculture in Pembrokeshire is generally intensive which is often damaging, particularly to biodiversity and archaeological sites. The steady decline of businesses in the Agriculture and Forestry sectors suggest that current economic conditions are difficult for farming and forestry, making it harder for these businesses to contribute to</p>

Number	Issue	Description
		enhancing landscape and biodiversity, and have a sustaining role in the culture and communities of the National Park.
8	The future of the built environment	The distinctiveness of the built environment of the National Park is reflected in the number of listed buildings, ancient monuments and conservation areas. However, the built environment faces a number of pressures: the availability of suitable materials and skills to restore and maintain traditional buildings; inappropriate development affecting the setting of historic buildings and the character of settlements; and adequate protection of the built environment outside conservation areas. It is important that new building and redevelopment are aesthetically appropriate and meet the highest standards for sustainability in design and construction
9	The use of the marine environment	<p>Coastal wildlife, coastal scenery and clean seas are key to the National Park's recreational attraction. Its coast is a major conservation asset and corridor for species movements. The boundaries of the Pembrokeshire Marine, Cardigan Bay, and Carmarthen Bay and</p> <p>Estuaries Special Areas of Conservation overlap around 75% of the National Park coastline. The National Park extends to Mean Low Water Mark but this is a maritime Park, and the factors which affect its maritime aspect are material considerations in the pursuit of National Park purposes and duty.</p> <p>Principal factors affecting the marine environment around Pembrokeshire are shipping activity around Milford Haven, commercial fishing, and recreational uses including inappropriate use of powered craft.</p>
10	Domestic and commercial resource use	This issue covers energy and water use, and the generation of waste, in domestic and commercial activities. It also covers resource exploitation activity such as quarrying. Use of resources is inevitable for economic and social development and the general well-being of the population. However, unsustainable and inefficient resource use impacts on the physical environment in terms of pollution, strain on ecosystems and landscape degradation.
11	Important archaeological &	The National Park has 285 Scheduled Monuments, and over 7500 sites in the Historic Environment Record. There are over 1200 listed

Number	Issue	Description
	historic resources	buildings and 13 designated Conservation Areas. Nine Historic Landscape areas are wholly or partly within the National Park, and there are 14 Historic Parks & Gardens in the National Park.
12	Important biological resources	There are 13 Special Areas of Conservation and 5 Special Protection Areas all or partly within the National Park, 60 Sites of Special Scientific Interest, 7 National Nature Reserves, one Local Nature Reserve and one Marine Conservation Zone.
13	Important geological resources	There are 52 Geological Conservation Review sites (sites of National or International importance) in the National Park. There is also an ongoing programme to identify Regionally Important Geological Sites (approximately 65 in the National Park).
14	Important landscape resources	Designation as a National Park is primarily due to the importance of the landscape. National Parks in the UK are classified by the International Union for the Conservation of Nature as Category 5: Protected Landscapes. These are defined as an 'area of land, with coast and sea as appropriate, where the interaction of people and nature over time has produced an area of distinct character with significant aesthetic, ecological and/or cultural value, and often with high biological diversity. Safeguarding the integrity of this traditional interaction is vital to the protection, maintenance and evolution of such an area.' ⁸
15	Affordable Housing	House prices and rents in the National Park are significantly higher than the rest of Pembrokeshire, the lower quartile sale price for houses in the National Park in 2014 was over seven times the median wage. This makes access to appropriate housing difficult for new households forming in the National Park, or existing households whose current accommodation is no longer suitable.
16	Quality of employment opportunities	Though there does not appear to be a shortage of employment opportunities in Pembrokeshire the jobs available are often low paid (over 25% of full time workers earned less than £18,000 per year in 2015, and over 25% of all workers earn less than £12,000 a year) and seasonal (winter benefit claimant rates are almost double those for summer).

⁸ IUCN (1994) Guidelines for Protected Area Management Categories. Cambridge: IUCN

Number	Issue	Description
17	Access to services	Closure of local services and the distance of travel to some services mean that access to essential services can be difficult in some parts of the National Park. This is aggravated by the relatively high number of households (16.4% at the 2011 Census, -2.9% on the 2001 Census) that do not own a car. This is an issue that requires more thorough analysis to ensure that certain sectors of the population are not excluded, and that people are not forced into increased use of private cars to access essential services.
18	Second and holiday homes	At the 2011 Census the National Park had one of the highest rates (27.7% ⁹) of second/holiday home use of its general housing stock in England and Wales. This is likely to impact negatively on the affordability of housing, and support for local facilities. Holiday homes also a significant element of the tourism economy of the National Park.
19	Military use of the National Park	There are a number of Ministry of Defence sites in the National Park, and there are problems associated with these in terms of disturbance, development and the restriction of access. Conversely the military presence has protected large areas from intensive agriculture and has therefore had positive effects in terms of biodiversity and the archaeological resource. The military also provide employment opportunities in the National Park.
20	Accessibility of the National Park as a recreational resource for all sectors of society	in the 2011/12 Pembrokeshire Visitors Survey found that most respondents were of white ethnicity and that three quarters were in the ABC1 socio-economic grouping (i.e. "white middle class"). ¹ For the National Park to meet its goals for inclusivity, opportunities to use the park for recreation need to be available to all sectors of society. Serviced and self-catering accommodation needs to be available to people on a range of incomes. This inclusivity would be threatened by policies that would shift Pembrokeshire's tourism product towards the high end of the market.
21	The national role of the National Park in improving health and well-being	National Parks provide the settings in which activities that promote good health and wellbeing can take place. These include 'active' benefits such as walking or cycling and 'passive' benefits such as those gained through 'tranquillity', inspirational scenery and encounters with nature National Parks support the good quality environments that are essential to maintaining clean air, water and land without which human health would suffer.
22	Cultural Distinctiveness	The percentage of welsh speakers in the Park increased between 1991 and 2001, but has since decreased between the 2001 and 2011 censuses. Whilst some communities within (or partially within) the National Park have experienced small increases

⁹ Based on Census 2011 "Households with no usual resident"

Number	Issue	Description
		<p>in the number of Welsh speakers many have experienced decreases between 2001 and 2011.(See Local Development Plan Background Paper on Welsh Language for a full community by community break down).</p> <p>With the exception of changes in the use of the Welsh language between Censuses, elements of cultural distinctiveness are difficult to define and measure, which creates a challenge to attempts to identify and nurture the distinctive elements of National Park communities.</p>
23	Demand for minerals	<p>There is demand for quarried minerals, in part fuelled by poor rates of recycling and reuse of mineral resources, and this National Park is a rich mineral resource. Current working quarries are reaching the end of their lives. Though National Planning Policy would advise against mineral extraction within National Parks except in exceptional circumstances, since 2000 the National Park Authority has received six applications to extend quarrying activity at existing site or carry out exploratory work for new resources. As of December 2013 there are currently 5 active quarry sites in Pembrokeshire Coast National Park (see Page C91 of Appendix B “Baseline information”).</p>
24	<p>The national role of the National Park in establishing awareness, appreciation and understanding of its special qualities</p>	<p>The second purpose of National Parks to promote understanding the special qualities of the National Parks – and influencing attitudes and behaviour – is essential to effective conservation of the Park. The goal is to impart the values, and develop the skills and understanding take part in informed decisions about how things can be done more sustainably. These educational outcomes are likely to reveal themselves in subtle changes in behaviour, occurring over significant periods of time. Therefore assessing the impact of the opportunities offered by the National Park in achieving these goals is likely to be difficult.</p>

Sustainability Objectives

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

Objective Number	Sustainability Objective
1	Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well-being.
2	Locate developments so as to minimise the demand for travel, especially by private car.
3	Conserve and enhance landscapes, townscapes and seascapes, and all their components (including the built environment and archaeology) with reference to the special qualities of the National Park
4	Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.
5	Increase the number of visitors using the National Park outside the peak visitor season.
6	Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.
7	Reduce factors contributing to climate change.
8	Maximise the contribution of the limited opportunities for development to sustaining local communities.
9	Encourage access for all to the National Park, reflecting the social mix of society.
10	Maintain the cultural distinctiveness of communities.
11	The adverse effects of minerals exploitation in the National Park decline from the present level and the potential biodiversity and landscape gains of former minerals sites are realised.
12	Reduce the negative impacts of waste.
13	Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population
14	Maintain and enhance biodiversity both within and outside designated sites
15	Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.

5 Sustainability Appraisal of the Plans' Vision and Objectives

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

Vision

- 5.1 The Local Development Plan contains a vision for the National Park describing the land use elements of the National Park Management Plan Vision. It:
- has a 15 year horizon
 - is particular to this National Park
 - takes account of the Welsh Government's agenda and policy and regional, partner and neighbouring authorities' strategies and plans.
 - reflects national and international trends
- 5.2 The vision and the summary of its appraisal is included below. The full appraisal matrix is included in appendix A.

The Vision for the Pembrokeshire Coast National Park as included in the Replacement Local Development Plan Preferred Strategy

- 5.3 Development continues to respect and where possible enhance the special qualities. This means that the Park's population will not be able to increase significantly. The limited opportunities for development that can be made available are wherever possible made available for development that contributes most to sustaining local communities where compatible with the statutory National Park purposes.
- 5.4 Tenby, Newport, Saundersfoot, St Davids and many of the National Park's more rural communities have accommodated additional growth in housing in order to facilitate the delivery of affordable housing for the communities of the National Park. Employment development has been focussed on 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.
- 5.5 New development has been predominantly directed to communities linked by a convenient, low-impact and affordable public transport network. Significantly, improved cycle and public rights of way networks provide a clean and easily accessible means of transport for our communities as well as support for increased recreational activity.
- 5.6 In common with the rest of the United Kingdom, the Park has been adapting to the changing climate. Development is more sustainable in design. There is, in new development, a distinctive but subtle vernacular building style that combines the best of the old with the best of the new. Renewable energy generation schemes are more popular. Development has been directed away from areas that are or will be prone to inundate or flood.
- 5.7 The Park benefits from being an unbeatable socially inclusive year-round visitor destination concentrating on its strengths: low impact marine and coastal recreation, access to wildlife-rich countryside, and peace and quiet.

Summary of the Sustainability Appraisal of the Vision

- 5.8 The vision for landuse planning is for a National Park that has retained and enhanced its special qualities. The goal for development is that it is both sustainable and is that most needed

by the Park's communities. These communities are themselves sustained and retain their distinctive cultures. In the context of sustaining a National Park the vision represents a completely appropriate set of aspirations. The Local Development Plan review process has resulted in only minor changes to the wording; overall its context and direction remain the same as the vision for the current Adopted Local Development Plan.

Recommendation: No change to the vision

Compatibility of Plan objectives and Sustainability Objectives

5.9 The Objectives for the Replacement Local Development Plan Preferred Strategy were assessed for their compatibility with the Sustainability Objectives. Unlike the Sustainability Appraisal of the policies, which assesses whether the Plan will contribute (or not) to meeting the Sustainability Objective, this assessment also allows the reverse consideration, i.e. will pursuing the Sustainability Objective help in pursuing the Plan Objective.

5.10 The compatibility analysis is summarised in the following table. Below is a key for the compatibility analysis.

+	LDP Objective and Sustainability Objective are compatible
0	There is no substantial relationship between the LDP Objective and the Sustainability Objective
-	LDP Objective and Sustainability Objective are incompatible.
?	Compatibility is significantly uncertain.

Combinations of the above symbols have been used where there are minor potential compatibility effects.

5.11 Generally the plan Objectives are found to be compatible with the Sustainability Objectives, the few exceptions usually reflect an uncertainty on how the objective might be expressed in particular circumstances. Some question marks as to the compatibility of objectives also arise from the fact that pursuing one Plan or Sustainability Objective, without heed to the others could result in success in one to the detriment of another. For instance goals for increasing visitors and physical recreation in the Park may result in harm to biodiversity if visitor numbers and disturbance are allowed to become too great.

<p>"Sustainability Objective</p> <p>+ Objectives compatible 0 No substantive relationship or effects between objectives - Objectives incompatible ? Relationship between objectives is uncertain</p> <p>Plan Objective"</p>	<p>1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well-being.</p>	<p>2. Locate developments so as to minimise the demand for travel, especially by private car.</p>	<p>3. Conserve and enhance landscapes, townscapes and seascapes, and all their components (including the built environment and archaeology) with reference to the special qualities of the National Park.</p>	<p>4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.</p>	<p>5. Increase the number of visitors using the National Park outside the peak visitor season.</p>	<p>6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.</p>	<p>7. Reduce factors contributing to climate change.</p>	<p>8. Maximise the contribution of the limited opportunities for development to sustaining local communities.</p>	<p>9. Encourage access for all to the National Park, reflecting the social mix of society.</p>	<p>10. Maintain the cultural distinctiveness of communities.</p>	<p>11. The adverse effects of minerals exploitation in the National Park decline from the present level and the potential biodiversity and landscape gains of former minerals sites are realised.</p>	<p>12. Reduce the negative impacts of waste.</p>	<p>13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population.</p>	<p>14. Maintain and enhance biodiversity both within and outside designated sites.</p>	<p>15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.</p>
<p>To 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)</p>	+	0	+	+	0?+	?	0?	0	0	0	+	+	0	0?+	0?+
<p>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.)</p>	+	+	+	?	+/-	+	+	+	0	0	+	+	0	+	+
<p>To conserve and enhance the special landscape and seascape character of the National Park. (Policy 8 and Policy 15.)</p>	+	+	+	?	+	+	0	?	0	+	+	+	0	+	+
<p>To conserve and enhance the cultural richness of the National Park. (Policy 8 and Policy 12.)</p>	+	0	+	0	0	+	0	+	+	+	0	0	0	0	0
<p>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</p>	0/+	+	0	0	0	0	+	+	0	+	0	0	+	0	0

<p>"Sustainability Objective</p> <p>+ Objectives compatible 0 No substantive relationship or effects between objectives - Objectives incompatible ? Relationship between objectives is uncertain</p> <p>Plan Objective"</p>	<p>1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well-being.</p>	<p>2. Locate developments so as to minimise the demand for travel, especially by private car.</p>	<p>3. Conserve and enhance landscapes, townscapes and seascapes, and all their components (including the built environment and archaeology) with reference to the special qualities of the National Park.</p>	<p>4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.</p>	<p>5. Increase the number of visitors using the National Park outside the peak visitor season.</p>	<p>6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.</p>	<p>7. Reduce factors contributing to climate change.</p>	<p>8. Maximise the contribution of the limited opportunities for development to sustaining local communities.</p>	<p>9. Encourage access for all to the National Park, reflecting the social mix of society.</p>	<p>10. Maintain the cultural distinctiveness of communities.</p>	<p>11. The adverse effects of minerals exploitation in the National Park decline from the present level and the potential biodiversity and landscape gains of former minerals sites are realised.</p>	<p>12. Reduce the negative impacts of waste.</p>	<p>13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population.</p>	<p>14. Maintain and enhance biodiversity both within and outside designated sites.</p>	<p>15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.</p>
Policy 48)															
No new mineral workings or extensions to existing mineral workings will be allowed within the National Park other than in exceptional circumstances. (Policy 21 to Policy 26)	0	0	+	0	0	0	0	0	0	0	+	+	0	+	+
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)	0	0	+	0	0	0	+	0	0	0	0	+	0	+	+
No intensification of use or extension of Ministry of Defence sites will be allowed save in exceptional circumstances.	+?-	+?-	+	0	0	0	+	0	+	+	?	?	0	+	+
To minimise the creation of new sources of pollution and contamination and to address issues relating to the instability of land within the National Park. (Policy 9)	+	+	+	+	0	0	+	+	0	0	+	+	0	+	+
To improve energy conservation and efficiency and to contribute to national targets for renewable energy. (Policy 33)	+	0	+	0	0	0	+	+	0	0	0	+	0	+	+

<p>"Sustainability Objective</p> <p>+ Objectives compatible 0 No substantive relationship or effects between objectives - Objectives incompatible ? Relationship between objectives is uncertain</p> <p>Plan Objective"</p>	<p>1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well-being.</p>	<p>2. Locate developments so as to minimise the demand for travel, especially by private car.</p>	<p>3. Conserve and enhance landscapes, townscapes and seascapes, and all their components (including the built environment and archaeology) with reference to the special qualities of the National Park.</p>	<p>4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.</p>	<p>5. Increase the number of visitors using the National Park outside the peak visitor season.</p>	<p>6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.</p>	<p>7. Reduce factors contributing to climate change.</p>	<p>8. Maximise the contribution of the limited opportunities for development to sustaining local communities.</p>	<p>9. Encourage access for all to the National Park, reflecting the social mix of society.</p>	<p>10. Maintain the cultural distinctiveness of communities.</p>	<p>11. The adverse effects of minerals exploitation in the National Park decline from the present level and the potential biodiversity and landscape gains of former minerals sites are realised.</p>	<p>12. Reduce the negative impacts of waste.</p>	<p>13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population.</p>	<p>14. Maintain and enhance biodiversity both within and outside designated sites.</p>	<p>15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.</p>
<p>To safeguard and enhance the soil, air and water quality of the National Park.</p>	+	0	+	0	0	+	+	0	0	0	+	+	0	+	+
<p>The design of all development in the National Park reflects its special landscape and townscape qualities and local distinctiveness and meets the highest standards for resource use including minimising waste, and takes account of the impact of a changing climate. (Policy 9, Policy 29, Policy 30, Policy 31, and Policy 32)</p>	+	0	+	+	0	+	+	?	+?	+?	+	+	0	+	+
<p>To ensure development does not take place in locations where it may be at risk from flooding or where it would increase the risk of flooding in another location. (Policy 34)</p>	+?	0	0	0	0	+	0	?	0	0	0	0	+	0	+
<p>Help to create and maintain a diverse, viable and sustainable local economy benefiting all sections of the community. (Policy 42 and Policy 43)</p>	+	+	?	0	0	0	+/-	+	+	+	?	?	+	0	0
<p>To attract a sustainable number of people at all times of the year to enjoy the special qualities of the National Park. (Policy 35)</p>	+	+/-	+	+	+	0	?	+	+	?	0	0	+	+	+

<p>"Sustainability Objective</p> <p>+ Objectives compatible</p> <p>0 No substantive relationship or effects between objectives</p> <p>- Objectives incompatible</p> <p>? Relationship between objectives is uncertain</p> <p>Plan Objective"</p>	<p>1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well-being.</p>	<p>2. Locate developments so as to minimise the demand for travel, especially by private car.</p>	<p>3. Conserve and enhance landscapes, townscapes and seascapes, and all their components (including the built environment and archaeology) with reference to the special qualities of the National Park.</p>	<p>4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.</p>	<p>5. Increase the number of visitors using the National Park outside the peak visitor season.</p>	<p>6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.</p>	<p>7. Reduce factors contributing to climate change.</p>	<p>8. Maximise the contribution of the limited opportunities for development to sustaining local communities.</p>	<p>9. Encourage access for all to the National Park, reflecting the social mix of society.</p>	<p>10. Maintain the cultural distinctiveness of communities.</p>	<p>11. The adverse effects of minerals exploitation in the National Park decline from the present level and the potential biodiversity and landscape gains of former minerals sites are realised.</p>	<p>12. Reduce the negative impacts of waste.</p>	<p>13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population.</p>	<p>14. Maintain and enhance biodiversity both within and outside designated sites.</p>	<p>15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.</p>
<p>To provide for housing to facilitate delivery of affordable housing needs of the National Park without compromising National Park purposes. (Policy 44, Policy 45, Policy 46 and Policy 47)</p>	?	+	+	0	0	0	?	+	0	+	0	0	+	0	0
<p>To encourage the retention and provision of a network of community facilities which reflect the needs of both National Park residents and visitors. (Policy 48)</p>	0	+	0	+	0	0	+	+	+	+	0	0	+	0	0
<p>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)</p>	0	+	+	+	+	0	+	+	+	+?	0	0	+	0	0
<p>To improve and promote accessibility by appropriate means and at appropriate times for the people who live, work, rest and play in the National Park whilst reducing the need to travel by private car. (Policy 2, Policy 3, Policy 4, Policy 5, Policy 6, Policy 7, Policy 52, Policy 53 and Policy 54)</p>	0	+	+	+	+	0	+	+	+	+	0	0	+	+	0
<p>To ensure adequate provision of utilities for local communities and that this provision is compatible with the National Park designation and protection of its resources.</p>	+	0	+	0	0	0	0	+	0	0	0	0	+	+	+

Appraisal of Local Development Plan policies and policy options

- 5.12 A summary of the Sustainability Appraisal of the Pembrokeshire Coast National Park Replacement Local Development Plan Preferred Strategy Policies is provided in the tables that follow in this section. These tables also include the policy options that were considered when developing the policies. Detailed Sustainability Appraisal of the Policy Options and Policies can be found in Appendices B and A respectively.
- 5.13 As mentioned above, some policies in the Local Development Plan have been all or in part formulated from a set of alternative Policy Options. In these cases the Sustainability Appraisal of alternative options relevant to the Replacement Local Development Plan Preferred Strategy considered in relation to each Policy is included in Appendix B.
- 5.14 Of particular note are the strategic Policies in the Plan relating to National Park purposes (Policy 1); the scale and location of growth (Policy 20) and Spatial Strategy (Policies 2 to 7); Visitor Economy (Policy 35) and housing (Policies 44 & 45).
- 5.15 No alternatives were considered for Policy 1 as any alternative would represent, to some extent, and deviation from the National Park Purposes and Duty, which are set by legislation. Therefore any alternative option would not represent a realistic approach.
- 5.16 Policies 2 to 7 and Policy 20 emerged from two sets of alternative strategic options:
- to adopt the Wales Spatial Plan Approach (Option 1) or to continue the Joint Unitary Development Plan approach (Option 2) to defining a settlement hierarchy; and
 - to continue the National Park Authority's current approach of providing for development to meet the needs of the local population where it is compatible with the National Park designation (Option 1) or to seek to achieve Welsh Government projections for the area on a pro-rata basis with other Planning Authorities in the South West Wales area (Option 2).
- 5.17 The Sustainability Appraisal concluded that Option 1 for policies 2-7 and 20 respectively aligned best with Sustainability Appraisal Objectives. The full appraisal of these options can be found in appendix B
- 5.18 Policy 7 was further informed by alternative options for infilling and rounding off and the conversion of buildings in the countryside with new options introduced during the Local Development Plan Review Process. These aspects of the policy were considered important to the LDP review process due to difficulties experienced with the issues of affordable housing and accessibility.

Infilling and rounding off

- Sensitive infilling and rounding off prioritising affordable housing and considering character and accessibility (Option 1)
- Infilling and rounding off with no accessibility requirements except no affordable housing in inaccessible areas, with only housing contributions sought (no units) (Option 2)
- Infilling and rounding off for affordable housing only (Option 3)
- Infilling and rounding off for market housing in accessible locations with a requirement for offsite affordable housing contributions (Option 4)

Conversion of buildings in the Countryside

- Conversion of buildings where contributing to character for a range of uses including affordable housing, where there is accessibility to mains towns and villages (Option 1)
- Conversion of appropriate buildings for a range of uses, with a priority for affordable housing.

- No unacceptable impact on character, accessibility is an important consideration (Option 2)
- Conversion of buildings for residential use only, including affordable housing, where opportunities for employment or self-catering accommodation have been explored (Option 3)
- Conversion of buildings for a variety of uses, off site contributions sought for market housing. No affordable housing can be permitted in inaccessible areas (Option 4)
- Permit a variety of conversion uses, affordable housing contributions required on conversions to market housing (Option 5)

5.19 The Sustainability Appraisal concluded that Option 1 was the most sustainable option for infilling and round off, and Option 2 for conversion of buildings in the countryside.

5.20 Policy 35 d) was developed from three options:

- Option 1: Proposals for visitor attractions and recreational and leisure development will be permitted in the Local Service and Tourism Centre and the Local Centres. Proposals for visitor attractions in Rural Centres will need to demonstrate a need to be outside the Local Service and Tourism Centre and Local Centres. Proposals to locate visitor attractions in the countryside will need to demonstrate why a countryside location is essential. Countryside proposals should make use of existing buildings whenever possible.
- Option 2: Proposals for visitors attractions and recreational and leisure development will be permitted within Centres. Proposals for attractions outside settlements will need to demonstrate why a countryside location is essential. Countryside proposals should make use of existing buildings whenever possible.
- Option 3: Permitting visitor attractions, recreational and leisure activities in or adjacent to Centres. Proposals in the countryside will need to demonstrate why a 'Rural Centre' or 'Countryside' location is essential. Countryside proposals should make use of existing buildings whenever possible.

5.21 The Sustainability Appraisal concluded that Option 1 was the most sustainable option.

5.22 The housing policies (44 & 45) emerged from alternative policy options to negotiate 50% affordable housing in developments of 2 or more units and where housing need is greater than supply in individual centres seek to allocate land for 100% affordable housing on small sites of 10 units or less (Option 1) or to continue with the Joint Unitary Development Plan approach and negotiate 20% affordable housing on sites of 3 or more units (Option 2); or seek to negotiate affordable housing to meet identified need on housing developments in the housing sub-market areas and Centres based on the results of a viability appraisal (Option 3).

5.23 The Sustainability Appraisal concluded that in the context of the limited capacity for development in the National Park, and the demand for affordable housing Option 1 was best aligned with the Sustainability Objectives.

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

++	There is a generally consistent strong positive association between the policy option and the Sustainability Objectives.
+	There is a weak or inconsistent, but generally positive association between the policy option and the Sustainability Objectives.
0	There is not a significant association between the policy option and the Sustainability Objectives, or the association is neutral (the combination +/- is used where it is believed a policy will have both positive and negative effects with regard to a particular Sustainability Objective).

-	There is a weak or inconsistent, but generally negative association between the policy option and the Sustainability Objectives.
--	There is a generally consistent strong negative association between the policy option and the Sustainability Objectives.
?	The association between the policy option and the Sustainability Objectives is uncertain, may be used in association with other symbols to indicate a degree of uncertainty in the conclusion

★ - indicates the option(s) preferred in the Sustainability Appraisal.

✳ - indicates the option(s) chosen for the Preferred Strategy

Spatial Strategy

<p>Policy 2: TENBY LOCAL SERVICE AND TOURISM CENTRE (TIER 2) (Strategy Policy) Tenby is designated a 'Local Service and Tourism Centre' where the land use priorities will be:</p> <ul style="list-style-type: none"> a) to aim to provide for and or permit housing, to facilitate the delivery of the affordable housing needs of the local area b) to permit proposals for small scale employment development to meet the needs of the town. c) to protect and enhance the town's facilities and town shopping centre which serve the needs of the local area d) to protect and enhance the harbour area. e) to ensure developments permitted contribute to the protection and enhancement of the town's special qualities f) to permit proposals that assist in delivering improved traffic management in the town. 		
Policy options appraised for the Replacement Local Development Plan Preferred Strategy		Summary of Appraisal
★✳ Option 1: Adopt and complement the Wales Spatial Plan approach for the Pembrokeshire Haven area when defining a settlement hierarchy.	+	Minerals and waste policies of the Plans should ensure a more sustainable approach to minerals extraction and waste disposal are agreed. Some negative impacts for these factors seem unavoidable. Maintaining cultural distinctiveness appears to be addressed better here.
Option 2: Continue with the current Joint Unitary Development Plan approach.	+/-	Minerals and waste policies of the Plans should ensure a more sustainable approach to minerals extraction and waste disposal are agreed. Some negative impacts for these factors seem unavoidable. This option is not as sustainable because growth can be directed to less accessible locations.

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

Policy 3: NEWPORT LOCAL CENTRE (TIER 3) (Strategy Policy)		
Newport is designated a 'Local Centre' where the land use priorities will be:		
<ul style="list-style-type: none"> a) to provide for and or permit housing, to facilitate the delivery of the affordable housing needs of the local area b) to permit proposals for small scale employment development to meet the needs of the local area 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 qualities e) to permit proposals that assist in delivering improved traffic management in the town 		
Policy options appraised for the Replacement Local Development Plan Preferred Strategy		Summary of Appraisal
★●Option 1: Adopt and complement the Wales Spatial Plan approach for the Pembrokeshire Haven area when defining a settlement hierarchy.	+	Minerals and waste policies of the Plans should ensure a more sustainable approach to minerals extraction and waste disposal are agreed. Some negative impacts for these factors seem unavoidable. Maintaining cultural distinctiveness appears to be addressed better here.
Option 2: Continue with the current Joint Unitary Development Plan approach.	+/-	Minerals and waste policies of the Plans should ensure a more sustainable approach to minerals extraction and waste disposal are agreed. Some negative impacts for these factors seem unavoidable. This option is not as sustainable because growth can be directed to less accessible locations.
Overall sustainability Appraisal of Policy		
+	Through its focus on maintaining the character of the town and meeting the needs of its population the policy performs well in the context of the Sustainability Appraisal. The concerns over mineral use and waste generation reflect that any proposal that leads to development may have unsustainable elements that must be offset by the benefits.	
Recommendation: No change to the policy		

Policy 4: SAUNDERSFOOT LOCAL CENTRE (TIER 3) (Strategy Policy)	
Saundersfoot is designated a 'Local Centre' where the land use priorities will be:	
<ul style="list-style-type: none"> a) to provide for and or permit housing to facilitate the delivery of the affordable housing needs of the local area. b) to permit proposals for small scale employment opportunities to meet the needs of 	

<p>the local area.</p> <p>c) to protect and enhance the district shopping centre and community facilities to meet the needs of the local area.</p> <p>d) to ensure developments permitted contribute to the protection and enhancement of the village's special qualities.</p> <p>e) to permit proposals that assist in delivering improved traffic management in the Centre and accessibility to the railway station.</p> <p>f) to protect and enhance the harbour.</p>		
Policy options appraised for the Replacement Local Development Plan Preferred Strategy		Summary of Appraisal
<p>★✳️Option 1: Adopt and complement the Wales Spatial Plan approach for the Pembrokeshire Haven area when defining a settlement hierarchy.</p>	+	<p>Minerals and waste policies of the Plans should ensure a more sustainable approach to minerals extraction and waste disposal are agreed. Some negative impacts for these factors seem unavoidable. Maintaining cultural distinctiveness appears to be addressed better here.</p>
<p>Option 2: Continue with the current Joint Unitary Development Plan approach.</p>	+/-	<p>Minerals and waste policies of the Plans should ensure a more sustainable approach to minerals extraction and waste disposal are agreed. Some negative impacts for these factors seem unavoidable. This option is not as sustainable because growth can be directed to less accessible locations.</p>
Overall sustainability Appraisal of Policy		
+	<p>Through its focus on maintaining the character of the town and meeting the needs of its population the policy performs well in the context of the Sustainability Appraisal. The concerns over mineral use and waste generation reflect that any proposal that leads to development may have unsustainable elements that must be offset by the benefits.</p>	
<p>Recommendation: No change to the policy</p>		

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.
- b) to permit proposals for small scale employment development to meet the needs of the local area.
- 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 qualities.
- e) to permit proposals that assist in delivering improved traffic management in the City and wider peninsula.

Policy options appraised for the Replacement Local Development Plan Preferred Strategy		Summary of Appraisal
★✳️Option 1: Adopt and complement the Wales Spatial Plan approach for the Pembrokeshire Haven area when defining a settlement hierarchy.	+	Minerals and waste policies of the Plans should ensure a more sustainable approach to minerals extraction and waste disposal are agreed. Some negative impacts for these factors seem unavoidable. Maintaining cultural distinctiveness appears to be addressed better here.
Option 2: Continue with the current Joint Unitary Development Plan approach.	+/-	Minerals and waste policies of the Plans should ensure a more sustainable approach to minerals extraction and waste disposal are agreed. Some negative impacts for these factors seem unavoidable. This option is not as sustainable because growth can be directed to less accessible locations.
Overall sustainability Appraisal of Policy		
+	Through its focus on maintaining the character of the town and meeting the needs of its population the policy performs well in the context of the Sustainability Appraisal. The concerns over mineral use and waste generation reflect that any proposal that leads to development may have unsustainable elements that must be offset by the benefits.	
Recommendation: No change to the policy		

Policy 6: RURAL CENTRES (TIER 4) (Strategy Policy) In Rural Centres the land use priorities will be: <ul style="list-style-type: none"> a) to provide for and/or permit housing to facilitate the delivery of affordable housing needs for the local area. b) to permit small scale employment developments. c) to protect and enhance the Centre's range of facilities. 		
Policy options appraised for the Replacement Local Development Plan Preferred Strategy		Summary of Appraisal
★✳️Option 1: Adopt and complement the Wales Spatial Plan approach for the Pembrokeshire Haven area when defining a settlement hierarchy.	+	Minerals and waste policies of the Plans should ensure a more sustainable approach to minerals extraction and waste disposal are agreed. Some negative impacts for these factors seem unavoidable. Maintaining cultural distinctiveness appears to be addressed better here.
Option 2: Continue with the current Joint Unitary Development Plan approach.	+/-	Minerals and waste policies of the Plans should ensure a more sustainable approach to minerals extraction and waste disposal are agreed. Some negative impacts for these factors seem unavoidable. This option is not as sustainable because growth can be directed to less accessible locations.
Overall sustainability Appraisal of Policy		
+	Through its focus on maintaining the character of the town and meeting the needs of its population the policy performs well in the context of the Sustainability Appraisal. The concerns over mineral use and waste generation reflect that any proposal that leads to development may have unsustainable elements that must be offset by the benefits.	
Recommendation: No change to the policy		

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: <ul style="list-style-type: none"> a) it constitutes sensitive filling in of small gaps or minor extensions (i.e. rounding off) to isolated groups of dwellings is proposed. Off-site affordable housing contributions will be sought. 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 proposed. c) farm diversification including farm shops is proposed (see 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.
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<p>f) A new or extended community facility is proposed – see Policy 48.</p> <p>g) The proposal constitutes a One Planet Development – see Policy 47.</p> <p>h) New farm buildings are justified for agricultural purposes.</p> <p>i) Land is released at the edge of a Centre for a small employment site (See Policy 42) or an extension to an established business in the countryside is required or it is a new business aiming to join existing clusters.</p> <p>j) There is an exceptional land release adjoining Centres for affordable housing to meet an identified local need – see Policy 45.</p> <p>k) There is a need for an exceptional land release to relocate development affected by coastal change – see Policies 34b and 34c.</p>		
Policy options appraised for the Replacement Local Development Plan Preferred Strategy		Summary of Appraisal
a) Infilling and rounding off (exclusive options)		
<p>★●Option 1: it constitutes sensitive filling in of small gaps or minor extensions to isolated groups of dwellings is proposed. Priority will be given to meeting affordable housing needs. Release of land will depend on the character of the surroundings, the pattern of development in the area and the accessibility to the Centres identified in the hierarchy</p>	++	<p>Accepting that certain impacts are unavoidable, this option (the current policy position) is the most compatible with the sustainability objectives of the 4 options as it is likely to deliver the most benefits by;</p> <ul style="list-style-type: none"> • reducing the need to travel • Securing affordable housing • And helping to sustain community facilities by locating infill development in accessible locations
<p>Option 2: Infill and rounding off for housing. There are no accessibility requirements. Affordable housing is not permitted in inaccessible locations. Off site affordable housing contributions are sought on market housing.</p>	-	<p>Having no restrictions on accessibility is likely to increase reliance on the private car. There are also potential detrimental effects to the special qualities of the National Park through the loss of communities and cultural distinctiveness.</p>
<p>Option 3: Infill and rounding off for affordable housing only.</p>	-	<p>Whilst the potential benefits to rural communities within the National Park are clear, locating development in inaccessible locations is not sustainable in the long term.</p>
<p>Option 4: Development will include the opportunity for infill and rounding off for market housing in accessible locations. Off site affordable housing contributions will be required on such proposals.</p>	+	<p>This option is largely compatible with the SA Objectives as it places a requirement for homes built in infill and rounding off opportunities to be in accessible locations, reducing their environmental impacts and making them more socially inclusive for both residents and visitors.</p>
d) Conversion of buildings in the countryside (exclusive options)		
<p>Option 1: Allow conversion of buildings in the 'Countryside' where contributing to the character of the area to housing including affordable housing, farm shops, employment related uses where there is accessibility to the main towns and villages.</p> <p>Also allow self-catering if in the Tenby Tourism Growth area.</p>	+	<p>There may be some boundary issues with the Tenby TGA. It is defined as a radius of 6 miles around Tenby, resulting in a (possibly intentional) fuzzy area Not allowing self-catering outside Tenby TGA may preclude such a use where full residential use is inappropriate in any case.</p>
<p>★Option 2: it constitutes the conversion of appropriate buildings to a range of uses with affordable housing being</p>	+	<p>This option is the most compatible with the SA Objectives. Aside from the potential landscape/townscape benefits of conversion</p>

<p>given priority in residential conversions. 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. Accessibility to the Centres will be an important consideration.</p>		<p>the option also prioritises affordable housing (which constitutes the greatest need, and includes accessibility as a key consideration, (which addresses the SA Objectives on climate change and community facilities) whilst allowing for a range of uses for converted buildings.</p>
<p>Option 3: Retain the existing Joint Unitary Development Plan option which only allows residential development including affordable housing provision where opportunities to secure employment related activities including self-catering accommodation have been explored.</p>	-	<p>This option will make it difficult to secure affordable housing.</p> <p>Lack of reference to landscape character means that conversions could be potentially detrimental to NP special qualities. This would however be considered as part of a suite of generic policy considerations.</p>
<p>Option 4: Conversion of buildings for a variety of uses (housing, holiday let, employment). Off site affordable housing contributions will be sought on market housing developments. No affordable housing can be permitted in inaccessible locations.</p>	-	<p>This option will make it difficult to secure affordable housing in more remote locations. There are no accessibility requirements for non-affordable housing developments.</p>
<p>Option 5: In recognition of the positive contribution of that buildings in the countryside can make to the character of the National Park landscape conversion of buildings to a variety of uses is also permitted. Affordable housing contributions are required on market dwelling conversions.</p>	-	<p>This option is more compatible with the SA Objectives than option 4 as it makes a requirement for affordable housing contributions, which may help to sustain local communities.</p>
<p>Overall sustainability Appraisal of Policy</p>		
+	<p>Generally this is a policy to restrict rather than facilitate development and as such can be viewed as sustainable in the context of protecting the countryside from development and avoiding development in locations away from facilities and services. However, with the exception of low impact developments (clause g), development that is allowed under this policy is likely to be less sustainable than development in rural or larger centres. The wording of the opening statement and clause d with regard to buildings unsuitable for conversion needs to be reviewed.</p>	
<p>Recommendation: No changes to the policy.</p>		

Special Qualities

Policy 8: SPECIAL QUALITIES (Strategy Policy)

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

The priorities will be to ensure that:

- a. The sense of remoteness and tranquillity is not lost and is wherever possible improved – see Policy 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 enhanced – see also Policy 14
- e. Development restores or wherever possible enhances the National Park's ecosystems. The protection of links between sites or the creation of links where sites have become isolated is of particular importance – see Policy 10 and Policy 11.
- f. Development conserves and wherever possible enhances Geological Conservation Review 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.

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

Policy options appraised for the Replacement Local Development Plan Preferred Strategy		Summary of Appraisal
Policy 8 – b) Green wedges		
Option 1: To continue with the green wedges identified within the Joint Unitary Development Plan.	n/a	Option not considered further: This option would not accord with the review of green wedges set out at paragraph 2.6.12 of Planning Policy Wales and is not appraised.
★❁Option 2: Review the need for, and the extent of green wedges within the Local Development Plan.	+	Green wedges should be based on a sound assessment, the outcome of which cannot be known until the review takes place. It is clear that, notwithstanding this, there is little relationship between this option and many of the sustainability objectives. Green wedges do have the potential to conserve landscapes, biodiversity, and to retain agriculture or forestry, but may limit genuine opportunities for new development if needlessly designated.

Overall sustainability Appraisal of Policy	
+	The Policy will yield strong sustainability benefits with regard to environmental concerns. There will also be strong benefits in social terms particularly in terms of quality of life and cultural identity.
Recommendation: No changes to the policy	
Note: Option 1 was carried out as part of the first Local Development Plan process. As part of Local Development Plan revision, the existing green wedges that were designated as a result, including those discarded in the assessment, have been re-assessed for inclusion within the replacement Local Development Plan.	

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:	
<ul style="list-style-type: none"> a. where the lighting proposed relates to its purpose; and, b. where there is not a significant adverse affect on the character of the area, local residents, vehicle users, pedestrians and the visibility of the night sky. 	
Wherever possible opportunities to mitigate potential cumulative impacts on the night sky should be explored.	
Policy options appraised for the Replacement Local Development Plan Preferred Strategy	Summary of Appraisal
Overall sustainability Appraisal of Policy	
+	The policy will have benefits to the landscape, sense of isolation in the Park and benefits for biodiversity.
Recommendation: No changes to the policy.	

Policy 10: Local Sites of Nature Conservation 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.	
Policy options appraised for the Replacement Local Development Plan Preferred Strategy	Summary of Appraisal
Overall sustainability Appraisal of Policy	
++	The Policy is likely to deliver significant sustainability gains, particularly with regard to biodiversity. However, the sustainability of this policy will depend to a large extent on how the relative importance of the conservation site and the development is judged, and how effectively alternative sites for development are sought.
Recommendation: No changes to the policy.	

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.	
Policy options appraised for the Replacement Local Development Plan Preferred Strategy	Summary of Appraisal
Overall sustainability Appraisal of Policy	
++	Overall the policy performs well against the SA Objectives particularly 1 and 14, which concern biodiversity directly. Further benefits are likely through the ecosystem services that would maintained for agriculture, tourism and climate change. In addition the wild life and habitats of the National Park are an intrinsic part of its landscape.
Recommendation: No changes to the policy.	

Policy 12: Welsh Language	
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.	
Policy options appraised for the Replacement Local Development Plan Preferred Strategy	Summary of Appraisal
Overall sustainability Appraisal of Policy	
+?	The policy is compatible with the relevant SA Objectives and may have minor beneficial effects.
Recommendation: No changes to the policy.	

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.	
Policy options appraised for the Replacement Local Development Plan Preferred Strategy	Summary of Appraisal

Overall sustainability Appraisal of Policy	
+	The policy is likely to prove positive with regard to Sustainability Objectives relating to the landscape and townscapes of the park.
Recommendation: No change to the policy.	

Policy 15: Conservation of the Pembrokeshire Coast National Park	
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:	
<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/or c) failing to harmonise with, or enhance the landform, landscape and seascape character of the National Park; and/or d) losing or failing to incorporate important traditional features. 	
In assessing the impact upon the National Park, matters of detail and cumulative impact will be given special consideration. Landscape Character Areas and Seascape Character Areas are shown on the Proposals Map (to be shown at Deposit stage)	
Policy options appraised for the Replacement Local Development Plan Preferred Strategy	Summary of Appraisal
Overall sustainability Appraisal of Policy	
+	Overall the policy performs well against the SA Objectives.
Recommendation: No changes to the policy.	

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.	
Policy options appraised for the Replacement Local Development Plan Preferred Strategy	Summary of Appraisal
Overall sustainability Appraisal of Policy	
+	Protects the undeveloped coast from development and maintains the character of coastal settlements.
Recommendation: No changes to the policy.	

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.	
Policy options appraised for the Replacement Local Development Plan Preferred Strategy	Summary of Appraisal
Overall sustainability Appraisal of Policy	
+	Will maintain the distinctiveness of harbour communities and help maintain vitality.
Recommendation: No changes to the policy.	

Major Development, the Potential for Growth

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) the access to the hazardous installations.	
Policy options appraised for the Replacement Local Development Plan Preferred Strategy	Summary of Appraisal
Overall sustainability Appraisal of Policy	
0	The policy is not relevant to the sustainability framework developed for the Local Development Plan. However, it is necessary for public protection.
Recommendation: No changes to the policy.	

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).
- c) Provide for and or permit housing, to facilitate the delivery of affordable housing needs. In addition priority will be given to the delivery of affordable housing needs over other uses in certain circumstances (see Policy 7, Policy 37, Policy 43, Policy 44 and 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 (Policy38A)
- 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.

Policy options appraised for the Replacement Local Development Plan Preferred Strategy		Summary of Appraisal
<p>★✳️Option 1: To provide for or permit housing to facilitate the delivery of affordable housing needs development where this is compatible with the National Park designation.</p>	+/-	<p>Development will result in some negative impact. Agricultural land loss would be tested against national planning policy. The minerals waste and transport sections look at ways of negating negative impact. The Scale and Location of Growth section looks at directing development to the most sustainable location. Limiting opportunities and not providing for all will raise social inclusion issues.</p>
<p>Option 2: To seek to achieve Welsh Government projections for the area.</p>	-	<p>Development will result in some negative impact. Agricultural land loss would be tested against national planning policy. The minerals waste and transport sections look at ways of negating negative impact. The Scale and Location of Growth section looks at directing development to the most sustainable location. This approach is more likely to have adverse impacts on the National Park landscape, culture, biodiversity and its attraction as a tourist destination depending on the level of growth that must be provided for.</p>
<p>Overall sustainability Appraisal of Policy</p>		
+	<p>It is inevitable that some negative impacts will arise from development particularly through increased use of resources and increased travel (with</p>	

	<p>associated greenhouse gas emissions). On the whole the policy aims to work within the requirements National Park designation and respect environmental limits. There is good potential for benefits to communities within the National Park as the Policy aims to meet employment and housing needs but do so at a scale that helps to maintain community distinctiveness. However, the policy lacks a direct mention of how community facilities will be maintain or enhanced alongside this although this is addressed through Policy 48 Community Facilities & Infrastructure Requirements. In addition how development is located is not included in this policy but is covered by National Policy alongside other policies of the Plan.</p>
<p>Recommendation: No changes to the policy.</p>	

<p>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).</p> <p>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:</p> <p>a) without prejudicing the proposed development; and b) by completing the extraction within a reasonable timescale; and c) without unacceptable environmental impacts.</p>	
Policy options appraised for the Replacement Local Development Plan Preferred Strategy	Summary of Appraisal
Overall sustainability Appraisal of Policy	
+	<p>The policy is a requirement of National planning policy which requires the safeguarding of certain key mineral resources. Extracting minerals from land that will be developed anyway can be regarded as a sustainable approach, effectively getting two uses from the same piece of land where extraction would be environmentally acceptable and economically and technically feasible.</p>
<p>Recommendation: No changes to the policy.</p>	

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 supply from the proposed source rather than from an existing site or sites with planning permission or from secondary or recycled aggregates either within or outside of the National Park; and
- e) the scale of the development is appropriate for the locality; and
- f) the development will not irretrievably damage the local landscape and local environment; and
- g) the development will not harm the amenities of the local area and local communities in particular with regard to access, traffic generated, noise, vibration, dust and safety nor adversely affect existing surface and groundwater resources; and
- h) any material transported by public highway can be accommodated within the local road network; and
- i) there is provision for a beneficial after-use, restoration, landscaping and post closure management of the site, including where possible details of progressive restoration of the site.

Policy options appraised for the Replacement Local Development Plan Preferred Strategy	Summary of Appraisal
Overall sustainability Appraisal of Policy	
+	Overall this policy performs well against the SA Objectives particularly objectives concerned with landscape and townscape.
Recommendation: No changes to the policy.	

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) is closely located in relation to the proposed construction or development site; and
- c) there are clear environmental benefits from meeting supply from the proposed source rather than from an existing site or sites with planning permission or from secondary or recycled aggregates either within or outside of the National Park; and
- d) the scale of the development is appropriate for the locality and to serve the local market; and
- e) the development will not have an unacceptably adverse impact or damage the local landscape and local environment; and
- f) the development will not harm the amenities of the local area and local communities in particular with regard to access, traffic generated, noise, vibration, dust and safety nor adversely affect existing surface and groundwater resources; and
- g) The local road network has the capacity to accommodate the traffic arising from the development; and

h) 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.	
Policy options appraised for the Replacement Local Development Plan Preferred Strategy	Summary of Appraisal
Overall sustainability Appraisal of Policy	
+	Due to the criterion to avoid environmental damage, the requirement that any sites opened under this policy are less damaging than existing sites or alternative sources, and the requirement for beneficial after-use, the policy is likely to be positive in sustainability terms.
Recommendation: No change to the policy.	

Policy 25: Recycled, Secondary and Waste Materials	
The use of recycled, secondary and waste materials, including demolition and construction waste arising from local sources will be supported provided:	
<ul style="list-style-type: none"> 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. 	
Policy options appraised for the Replacement Local Development Plan Preferred Strategy	Summary of Appraisal
Overall sustainability Appraisal of Policy	
+	The policy facilitates recycling and as such performs well against the SA objectives. Criteria in the policy will prevent unwanted negative impacts, particularly on nearby communities and the immediate environment.
Recommendation: No changes to the policy.	

Policy 26: Inactive Minerals Sites		
Where the Authority is satisfied that the winning and working of minerals or the depositing of mineral waste has ceased permanently it will investigate the appropriateness of serving a Prohibition Order on the owner(s).		
Policy options appraised for the Replacement Local Development Plan Preferred Strategy		Summary of Appraisal
Overall sustainability Appraisal of Policy		
+	Though this policy does not impact on many of the Sustainability Objectives, for those to which it is relevant it is positive, mainly through ensuring that the landscape and biodiversity value of former quarries is maintained.	
Recommendation: No change to the policy		

Policy 27: Local Waste Management Facilities		
Local waste management and recycling facilities which predominantly serve the National Park area will be permitted provided		
<ul style="list-style-type: none"> a) the site would be conveniently located in relation to the needs of the National Park community; or b) they are located at existing waste management sites or B2 industrial units; and c) the proposal makes provision for adequate screening so as to minimise any adverse effects; and d) the development is sufficiently distanced from neighbouring properties so as not to constitute a potential health or safety hazard; and e) the development will not cause demonstrable harm to the amenities of the local area and local communities in particular with regard to access, traffic generated, noise, vibration, dust, litter, odour nor adversely affect existing surface and groundwater resources. 		
Policy options appraised for the Replacement Local Development Plan Preferred Strategy		Summary of Appraisal
Option 1: The National Park accommodates regional waste facilities.		This option would not accord with national waste strategy or planning policy and guidance. It is therefore not appraised.
★●Option 2: Should the National Park Accommodate local community waste facilities?	+	Local waste facilities within the National Park would help to reduce the negative impacts of waste, and would have less of an impact on landscape and townscape and accord with national planning policy and waste strategy.
Overall sustainability Appraisal of Policy		
+	Local waste facilities within the National Park would help to reduce the negative impacts of waste, and would have less of an impact on landscape and townscape.	
Recommendation: No changes to the policy.		

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

Policy options appraised for the Replacement Local Development Plan Preferred Strategy		Summary of Appraisal
Overall sustainability Appraisal of Policy		
++	Composting at a local scale is likely to represent a sustainable way of dealing with suitable waste.	
Recommendation: No changes to the policy.		

Climate Change, Sustainable Design, Flooding, Sustainable Energy

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 distinctiveness (see Policy 8)
- b) Environment and biodiversity (see Policy 8)
- c) Community cohesion and health (see Policy 30)
- d) Accessibility (see Policy 52)
- e) Energy use
- f) Energy generation (see Policy 33)
- g) Materials and resources (see Policy 31)
- h) Water and drainage (see Policy 32)
- i) Waste (see Policy 31)
- j) Resilience to climate change

Policy options appraised for the Replacement Local Development Plan Preferred Strategy		Summary of Appraisal
Option 1 In all new buildings (excluding householder applications and extensions) a minimum CO2 emission reduction figure of 25% below current building regulation baseline will be required	++	Will help reduce the factors contributing to climate change although the additional 25% reduction may be onerous in many development schemes. There is uncertainty over the economic viability of increased build and sale costs being offset by reduced running costs for the completed building. The additional requirement may therefore be counterproductive. There is no national policy context for specific requirements by development type

		that are over and above national standards.
Option 2: Require all new dwellings and other new buildings to achieve BREEAM/EcoHomes “Excellent” rating	++	Will help reduce the factors contributing to climate change although the additional requirements may be onerous in many small scale development schemes. There is uncertainty over the economic viability of increased build and sale costs being offset by reduced running costs for the completed building. The additional requirement may therefore be counterproductive. There is no national policy context for specific requirements by development type that are over and above national standards.
★Option 3: Set energy and resource standards for particular types of development	++	Potential for a very positive contribution to meeting SA objectives although no national policy context for specific requirements by development type, that are over and above national standards.
✱Option 4: Leave Building Regulations to deal with energy and other resource standards, intervening only in the case of stricter energy targets for larger scale schemes	+	A positive contribution to meeting SA objectives, but potentially lower than in the more proactive alternative options. This option would comply with national policy where larger scale schemes relate to additional requirement for strategic sites.
Option 5 (new): Leave the WG standards to prevail plus add specific requirements for the more strategic development sites in the National Park and a minimum of solar thermal panels within all new buildings where there is a need to provide hot water for users.	++	The WG standards refer to Building Regulations for carbon reduction and energy efficiency. This option would allow for additional requirements on strategic sites. The requirement for solar panels may be unreasonable in some proposals.
Further options considered but not included in the draft policy		
★Option 1: Where appropriate require energy efficiency improvements in the original building as well as in the extension, etc. for which permission has been sought.	+	Would give gains relating to energy use and carbon footprint, but could also compromise the ability of households and public buildings to meet changes in their needs. Such a policy approach for households has proved unworkable in the current Local Development Plan. There is no national planning policy context for the implementation of such a policy for households or commercial buildings.
✱Option 2: Distribute energy awareness literature to applicants for extensions and other householder development.	+	This approach could also usefully address water use and drainage. However, we should also consider the monetary and environmental costs of producing literature unless there is already suitable 3rd party literature available. Such considerations need to be included from the outset of the design stage and so the application stage may be too late to influence significantly. Would putting such literature in with energy and water bills be more effective - offer an opportunity to save, rather than spend, money.

Overall sustainability Appraisal of Policy	
+	Overall this policy is likely to contribute positively to the SA Objectives, particularly those that focus on the management of natural resources and the causes and consequences of climate change.
Recommendation: No changes to the policy.	

Policy 30: Amenity Development will only be permitted where it does not have an unacceptable impact on amenity, particularly where: <ul style="list-style-type: none"> a) the development is for a use inappropriate for where people live or visit; and/or b) the development is of a scale incompatible with its surroundings; and/or c) the development leads to an increase in traffic or noise or odour which has a significant adverse impact; and/or d) the development is visually intrusive. 	
Policy options appraised for the Replacement Local Development Plan Preferred Strategy	Summary of Appraisal
Overall sustainability Appraisal of Policy	
+	The policy is appropriate in sustainability terms, particularly in the context of the first of the two National Park purposes.
Recommendation: No changes to the policy.	

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.	
Policy options appraised for the Replacement Local Development Plan Preferred Strategy	Summary of Appraisal
Overall sustainability Appraisal of Policy	
+	Generally steps to minimise waste and deal with it locally are likely to deliver sustainability gains, however the effect of dealing with waste locally could be simply to spread the negative effects more thinly if local waste management is not controlled as effectively as a larger scale facility would be.
Recommendation: No changes to the policy.	

Policy 32: Surface Water Drainage	
Development will be required to incorporate sustainable drainage systems for the disposal of surface waters on site.	
Policy options appraised for the Replacement Local Development Plan Preferred Strategy	Summary of Appraisal
Overall sustainability Appraisal of Policy	
+	The policy will have positive sustainability outcomes by helping prevent flooding and pollution.
Recommendation: No changes to the policy.	

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 offshore 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.	
Policy options appraised for the Replacement Local Development Plan Preferred Strategy	Summary of Appraisal
★✳️Option 1: A policy which sets out the manner which small scale, medium scale and larger scale proposals will be considered in light of the findings of the Renewable Energy Assessment. The policy also sets out parameters on how onshore connections will be considered.	+
Option 2: Encourage on site renewable energy development at an appropriate scale where community schemes have already been explored.	+
Option 3: Encourage small scale community based renewable energy development, but retain tight control over the location and design of larger scale development	+
	Renewable energy schemes are likely to contribute positively to a more sustainable society. In a National Park the impact of any renewable energy scheme on the landscape and other Special Qualities of the National Park must be a consideration, and therefore this policy makes less likely the larger scale developments that might generate significant amounts of renewable energy but cause more significant detrimental impacts.
	Whilst some renewable energy development may impact negatively on biodiversity and landscape, appropriate increased renewable energy would contribute to the reduction of factors contributing to climate change. The requirement to explore community based schemes in the first instance may prove unworkable.
	Whilst some renewable energy development may impact negatively on biodiversity and landscape, appropriate increased renewable energy would contribute to the reduction of factors contributing to climate change. Community based schemes by their nature

		are generally larger in scale than individual schemes and so there may be limited opportunities to encourage this within the National Park.
Option 4: To contribute to the development of alternative energy sources through the marine environment	+	Marine renewable energy can contribute to the sustainability objective on the contribution to climate change; the potential for effects on the marine environment should form part of this option.
Overall sustainability Appraisal of Policy		
+	Renewable energy schemes are likely to contribute positively to a more sustainable society. In a National Park the impact of any renewable energy scheme on the landscape and other Special Qualities of the National Park must be a consideration, and therefore this policy makes less likely the larger scale developments that might generate significant amounts of renewable energy but cause more significant detrimental impacts.	
Recommendation: No changes to the policy.		

Policy 34: FLOODING & COASTAL INUNDATION (Strategy Policy)	
In planning for the future development of the National Park;	
<p>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 Maps or Welsh Government's Development Advice Maps or Shoreline Management Plan 2 unless there are sound social or economic justifications in accordance with the advice set out in Technical Advice Note 15 (see Policy 34A, 34B and 34C).</p> <p>b) sustainable defence of the coast will be permitted to protect existing communities or assets where practicable and where they do not jeopardise the longer term and natural evolution of the coast.</p>	
Policy options appraised for the Replacement Local Development Plan Preferred Strategy	Summary of Appraisal
Overall sustainability Appraisal of Policy	
+	<p>Over the long term the aim of the policy is to ensure the National Park is managed to ensure that development is directed away from areas of flooding and coastal inundation and where practicable sustainably defend the coast. By its nature there are likely to be mixed outcomes in sustainability terms.</p> <p>This policy has developed from options that have been assessed as broadly sustainable though there is a great deal of uncertainty in this area particularly with regard to the rate and extent of sea level rise.</p>
Recommendation: No changes to the policy	

Policy 34A DEVELOPMENT IN THE COASTAL CHANGE MANAGEMENT AREA (New Policy)	
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 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	
Policy options appraised for the Replacement Local Development Plan Preferred Strategy	Summary of Appraisal
Overall sustainability Appraisal of Policy	
+	The policy aims to direct development away from areas at risk of flooding and ensure that existing flood risk is not increased. In doing so the policy will help to ensure that coastal communities within the National Park are more resilient to the effects to climate change.
Recommendation: No changes to the policy.	

Policy 34B RELOCATION OF EXISTING PERMANENT DWELLINGS AFFECTED BY COASTAL CHANGE (New Policy)	
Proposals for the relocation of existing permanent dwellings in the countryside affected by coastal change will be permitted, provided that:	
<ul style="list-style-type: none"> 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; and f) The existing site is cleared and made safe; g) The proposal complies with all other relevant policies of the Local Development Plan. 	
Policy options appraised for the Replacement Local Development Plan Preferred Strategy	Summary of Appraisal
Overall sustainability Appraisal of Policy	
+	By allowing the relocation of existing homes that are at risk from flooding or coastal erosion the policy will help to sustain coastal communities within the National Park. There is also good potential for biodiversity gain from this policy.
Recommendation: No changes to the policy.	

Policy 34C RELOCATION AND REPLACEMENT OF DEVELOPMENT (OTHER THAN RESIDENTIAL) AFFECTED BY COASTAL CHANGE (New Policy)

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
- d) The existing site is either cleared and made safe or put to a temporary use beneficial to the local community; and
- e) The proposal complies with all other relevant policies of the Local Development Plan.

Policy options appraised for the Replacement Local Development Plan Preferred Strategy	Summary of Appraisal
Overall sustainability Appraisal of Policy	
+	By allowing the relocation of existing business and community facilities that are at risk from flooding or coastal erosion the policy will help to sustain coastal communities within the National Park.
<p>Recommendation: The Sustainability Appraisal suggested that there could be a positive effect against Sustainability Appraisal Objective 3 (landscape/townscape) if the policy included a criterion like e) from Policy 34B. This criterion has been added as c). Not further changes to the policy are suggested.</p>	

Visitor Economy

Policy 35: VISITOR ECONOMY (Strategy Policy)

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 appraisal for Policy 38A)
- b) Permitting new hotels and guest houses within Centres or through the conversion of appropriate existing buildings 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 'Rural Centre' or 'Countryside' location is essential. Countryside proposals should make use of existing buildings whenever possible.
- f) Directing shore based facilities to the developed stretches of coast where compatible with adjacent uses. (See appraisal for Policy 17)

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

This appraisal concerns criterion d) of Policy 35, see appraisals for policies 17, 36, 37 and 38A*

Policy options appraised for the Replacement Local Development Plan Preferred Strategy	Summary of Appraisal	
Options for 35a)		
<p>★Option 1: Not allowing any additional camping, caravanning or chalet pitches in the National Park.</p> <p>Allowing upgrading of tent pitches to touring caravan pitches provided that one third of total pitches remains for tents.</p> <p>To allow the conversion of static and touring caravan or tent pitches to other forms of self-catering accommodation where the site lies within a settlement and the proposal forms part of a rationalisation scheme that would result in environmental benefits in terms of layout, design and materials used.</p>	+	<p>Likely to realise landscape benefits in terms of more appropriately designed and sited structures, likely to offer better opportunities for year round tourism.</p>
<p>✱Option 2: Allowing limited caravan, camping and chalet development, including site extensions and change</p>	+/-	<p>The policy option provides for less protection of the landscape and is likely to increase climatic factors such as waste and energy</p>

from camping to touring and static caravan pitches, in defined locations.		use. However, it provides for more community and employment benefits than option 1, as a trade-off.
Options for 35c)		
Option 1: Outside the Tenby Tourism Growth Area do not permit any further self-catering accommodation in the National Park.	+	Limits self-catering to a certain areas of the Park without taking into account community priorities.
Option 2: Do not permit any further self-catering accommodation in the National Park.	-	Limits self-catering but fails to prioritise use of sites for affordable housing which is a priority to sustain communities.
Option 3: Allow self-catering in conversions in the countryside and on brownfield sites in defined centres.	+/-	This policy would maximise opportunities for self-catering development but with no regard for affordable housing which is a priority to sustain communities.
Option 4: Allow self-catering accommodation on brownfield sites in the Plan's Centres and in conversions in the countryside except where an affordable housing need has been identified. In these instances affordable housing provision will be given priority.	++	Gives priority to affordable housing whilst allowing more self-catering provision
Option 5: Allow self-catering in conversions in the countryside.	0	The benefits of self-catering development communities are limited to the countryside. Affordable housing need is not considered.
★✳️Option 6: Allow self-catering only on brownfield sites in Centres or through conversion proposals in the countryside where the site or buildings is not appropriate for market or affordable housing provision.	++	Maximises opportunities for affordable housing provision whilst allowing for self-catering developments benefitting communities, the environment and economy.
Options for 35d)		
★Option 1: Proposals for visitor attractions and recreational and leisure development will be permitted in the Local Service and Tourism Centre and the Local Centres. Proposals for visitor attractions in Rural Centres will need to demonstrate a need to be outside the Local Service and Tourism Centre and Local Centres. Proposals to locate visitor attractions in the countryside will need to demonstrate why a countryside location is essential. Countryside proposals should make use of existing buildings whenever possible.	++	The policy may help to provide and sustain employment opportunities in the National Park and aims to direct proposals to the largest settlements which are able to absorb larger scale developments. Developments in other locations will need to justify the location.
Option 2: Proposals for visitors attractions and recreational and leisure development will be permitted within Centres. Proposals for attractions outside settlements will need to demonstrate why a countryside location is essential. Countryside proposals should make use of existing buildings	+?	The policy may help to provide and sustain employment opportunities in the National Park, but to a wider range of locations than option 1, thereby increasing potential for the need to travel and have greater impact on the National Park landscape. Countryside locations have to be justified.

whenever possible.		
<p>✱Option 3: Permitting visitor attractions, recreational and leisure activities in or adjacent to Centres. Proposals in the countryside will need to demonstrate why a 'Rural Centre' or 'Countryside' location is essential. Countryside proposals should make use of existing buildings whenever possible.</p>		<p>The policy may help to provide and sustain employment opportunities in the National Park, but to a wider range of locations than options 1 and 2, thereby increasing potential for the need to travel and have even greater impact on the National Park landscape. Countryside locations have to be justified.</p>
Overall sustainability Appraisal of Policy		
		<p>The policy may help to provide and sustain employment opportunities in the National Park. However, in the long term allowing tourist attractions in less accessible locations is unlikely sustainable.</p>
Recommendation: No changes to the policy.		

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Policy 36: Hotels and Guest Houses

New hotels and guest houses will be permitted within Centres or through the conversion of appropriate existing buildings in the countryside. 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.**

Policy options appraised for the Replacement Local Development Plan Preferred Strategy		Summary of Appraisal
Option 1: Protect against loss of all hotels and guest houses	+	Whilst this option is generally compatible with the SA Objectives in its aims it could ultimately result in the loss of serviced accommodation.
Option 2: Protect against loss of hotels and guesthouses unless it is proven that their continued use would be unviable or that peak demand can continue to be met in the locality.	+	Option least likely to result in the loss of serviced accommodation, with attendant negative effects.
Option 3: Protect against the loss of hotels and guesthouses in the Tenby Tourism Growth area.	-	More likely to result in loss of serviced accommodation, with more attendant effects than option 2.
Option 4: Allow conversion of hotels and guesthouses.	--	Could result in extensive loss of serviced accommodation with negative effects on settlement character and employment.
★✳️Option 5: Allow for the provision of and protect against loss of all hotels and guest houses unless it is proven that their continued use would be unviable or that peak demand can continue to be met in the locality.	+	Policy performs well against the relevant SA Objectives, no changes suggested.
Overall sustainability Appraisal of Policy		
+	Policy performs well against the relevant SA Objectives, no changes suggested.	
Recommendation: No changes to the policy.		

Policy 37: Self-Catering Development

Proposals for self-catering development will only be permitted on a brownfield site in a Centre 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.

Policy options appraised for the Replacement Local Development Plan Preferred Strategy

Summary of Appraisal

Overall sustainability Appraisal of Policy

+

The policy will help to sustain communities in the National Park by prioritising affordable housing. There may also be minor benefits for landscape/townscape through the use of brownfield land.

Recommendation: No changes to the policy.

Policy 38A: Caravan, Camping and Chalet Development (New)

New Caravan, Camping and Chalet sites and changes within existing sites will be considered in defined landscape character areas away from the coast and Preseli Hills and not inter-visible with them.

Extensions to existing sites will be considered where the extension is in a well-screened location.

Extensions to existing sites with no increase in pitch numbers to achieve clear environmental improvement in relation to landscaping and layout will be permitted in defined Landscape Character Areas where existing sites have highly prominent parts, often visible from the coast and inshore waters, and where extensions into allow pitches to be transferred to more discreet locations.

Proposals coming forward as set out above must ensure:

- 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.
- 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 facilities will need to 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.

Policy options appraised for the Replacement Local Development Plan Preferred Strategy		Summary of Appraisal
Overall sustainability Appraisal of Policy		
+	The policy provides a sensible trade-off between the protection of the landscape and the need to support the local tourism economy. It likely represents the most sustainable approach towards securing both.	
Recommendation: No changes to the policy.		

Policy options appraised for the Replacement Local Development Plan Preferred Strategy		Summary of Appraisal
Overall sustainability Appraisal of Policy		
+	The policy is unlikely to have a major impact on the Sustainability Objectives other than reducing the need for site users to travel.	
Recommendation: No changes to the policy.		

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 in the countryside or giving favourable consideration of new businesses in the countryside aiming to join existing clusters.
- 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 affordable market/housing provision will be given priority. (See Policy 43)
- e) Protecting and enhancing the harbours at Tenby, Saundersfoot, Solva and Porthgain. (See Policy 18)

***This appraisal concerns criterion c) and d), see appraisals for referenced policies for other criteria.**

Policy options appraised for the Replacement Local Development Plan Preferred Strategy		Summary of Appraisal
★✳️Option 1: Direct small-scale employment proposals to appropriate locations within or adjacent to Centres or buildings suitable for conversion in the countryside.	+	This option aims to provide employment in the most accessible places in the National Park at a scale that will be easily absorbed into the townscape to minimise the potential for negative landscape impacts.
Option 2: Direct small and medium-scale employment proposals to appropriate locations within or adjacent to Centres or buildings suitable for conversion in the countryside.	-	Whilst this option will provide for employment opportunities in the National Park in, the scale of development has greater potential for impacts to special qualities such as the landscape and community diversity. The option would provide employment in accessible locations and could potentially reduce the need to travel for some people. However, the scale would likely generate more trips from outside of centres.
Option 3: Direct small, medium and large-scale employment proposals to appropriate locations within or adjacent to Centres or buildings suitable for conversion in the countryside.	--	See appraisal for option 2, same effects but to a greater degree due to a further increase in the scale of development.
Overall sustainability Appraisal of Policy		
+	Overall this policy performs well against the SA criteria particularly those concerned with economy and communities through job creation.	
Recommendation: No changes to the policy.		

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).

Policy options appraised for the Replacement Local Development Plan Preferred Strategy	Summary of Appraisal

Overall sustainability Appraisal of Policy

+

Allows development land to be used more flexibly to meet the needs of communities. Likely to result in development on brown- rather than green-field sites.

Recommendation: No changes to the policy.

Policy 43A: Agricultural 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 ; and
- 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.

Policy options appraised for the Replacement Local Development Plan Preferred Strategy	Summary of Appraisal

Overall sustainability Appraisal of Policy

+

Overall this policy is largely compatible with the SA objectives.

Recommendation: No changes to the policy.

Affordable Housing and Housing

Policies 44 & 45: HOUSING & AFFORDABLE HOUSING (Strategy Policies)

Based on the level of anticipated affordable housing need, balanced against deliverability and landscape capacity provision is made for between an estimated 900 to 1000 housing units between 2015 and 2031(including a contingency).

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.

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.
- 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 2 or fewer affordable dwellings or where the provision of an affordable dwelling on site is not possible
 - infill and rounding off opportunities in the countryside (Policy 7)
 - Conversion opportunities in the countryside (Policy 7)
- c) Allow the exceptional release of land within or adjoining Centres for affordable housing to meet an identified local need.

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 XXX affordable housing units.

Policy options appraised for the Replacement Local Development Plan Preferred Strategy	Summary of Appraisal
Option 1: A policy based on the latest Welsh Government National Park Household Projections.	<div style="background-color: yellow; width: 100px; height: 100px; margin: 0 auto; display: flex; align-items: center; justify-content: center;">-</div> <p>A strategy that provides only affordable housing would seem to be compatible with the SA objectives related to social inclusion and community cohesion. However, the likelihood of progressing those objectives is significantly reduced over the other options as this strategy would rely on exception</p>

		<p>sites.</p> <p>The option also relies entirely on National Policy, which allows for development in inaccessible locations. Although the chances for this to happen are low, for the reasons stated above, the other options considered are inclusive of accessibility and on the whole are more likely to progress the SA Objectives.</p>
<p>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:</p> <ul style="list-style-type: none"> ▪ distribution of housing development in accordance with the Plan's spatial strategy ▪ the deliverability of sites ▪ the National Park's landscape capacity to absorb additional housing development 	++	<p>As option 3 but is likely to provide for less affordable housing due greater emphasis on deliverability.</p>
<p>Option 3: With an estimated supply of 1,300 housing units or less seek to negotiate 50% affordable housing in developments of 2 or more units in housing developments. Where housing need is greater than supply in individual centres seek to allocate land for 100% affordable housing on small sites of 10 units or less. Also allow the exceptional release of land in these locations for affordable housing. There will also be opportunities in countryside locations through filling in gaps or rounding off – see Scale and Location of Growth Policy Options.</p>	++	<p>Some negative impacts of housing development are inevitable these include waste, carbon emissions and minerals use. Other policies within the LDP will help to mitigate these as much as possible.</p> <p>This policy option directs housing development to where it is needed and prioritises affordable housing over market housing. This will enable people live locally, reducing their need to travel and help to maintain communities and their cultural distinctiveness in the National Park.</p>
<p>Option 4: Continue with the Joint Unitary Development Plan approach and seek to negotiate 20% on sites of 3 or more units. Also allow the exceptional release of land in these locations for affordable housing within or adjacent to settlements.</p>	+	<p>As option 3 but to a lesser degree as this policy allows for less affordable housing.</p>
Overall sustainability Appraisal of Policy		
+	<p>The policy proposes development which is likely to have a negative effect with regard to some elements of sustainability. However this can be justified by the social gains associated with aiming for a proportion of affordable housing and requiring market housing to cross subsidise this provision. Some of the negative effects are further mitigated by the requirements of the sustainable design policy, and careful selection of sites to avoid sites likely to have a significant impact on the special qualities of the National Park.</p>	
Recommendation: No changes to the policy.		

Policy 46: Gypsy Sites

Proposals for Gypsy and Traveller sites will be permitted where:

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

Policy options appraised for the Replacement Local Development Plan Preferred Strategy		Summary of Appraisal
Overall sustainability Appraisal of Policy		
+	The policy aims to integrate Gypsy and Traveller sites into existing communities in the National Park, ensure that residents have access to the services and facilities they need and minimise the impacts to landscape and character.	
Recommendation: No changes to the policy.		

Policy 47: One Planet Development

In addition to satisfying the requirements of national planning policy One Planet Development will be permitted where:

- a) the proposal will make a positive social and/or economic contribution with public benefit; and
- b) the development is of a scale no greater than is necessary to meet the needs of the overall project; and
- c) opportunities to reuse buildings which are available in the proposal's area of operation have been investigated and shown to be impracticable; and
- d) the development is well integrated into the landscape and does not have adverse visual effects.

Policy options appraised for the Replacement Local Development Plan Preferred Strategy	Summary of Appraisal
<p>Option 1: Continue with the low impact policy contained in the Joint Unitary Development Plan:</p> <p>Low impact development in the countryside that makes a positive contribution will be permitted where:</p> <ul style="list-style-type: none"> a) the proposal will make a positive environmental, social and/or economic contribution with public benefit; and b) all activities and structures on site have low impact in terms of the environment and use of resources; and c) opportunities to reuse buildings which are available in the proposal's area of operation have been investigated and shown to be impracticable; and d) the development is well integrated into the landscape and does not have adverse visual effects; and e) the proposal requires a countryside location and is tied directly to the land on which it is located, and involves agriculture, forestry or horticulture; and f) the proposal will provide sufficient livelihood for and substantially meet the needs of residents on the site; and g) the number of adult residents should be directly related to the functional requirements of the enterprise; and h) in the event of the development involving members of more than one family, the proposal will be managed and controlled by a trust, cooperative or other similar mechanism in which the occupiers have an Interest. 	<p>Appropriate low impact developments will be inherently sustainable and yield biodiversity and landscape benefits</p> <p style="text-align: center;">+</p>
<p>2: One Planet Development will be permitted where:</p> <ul style="list-style-type: none"> a) the proposal will make a positive 	<p>Appropriate low impact developments will be inherently sustainable and yield biodiversity and landscape benefits</p> <p style="text-align: center;">+</p>

<p>social and/or economic contribution with public benefit; and</p> <p>b) the development is of a scale no greater than is necessary to meet the needs of the overall project; and</p> <p>c) opportunities to reuse buildings which are available in the proposal's area of operation have been investigated and shown to be impracticable; and</p> <p>d) the development is well integrated into the landscape and does not have adverse visual effects.</p>		
Overall sustainability Appraisal of Policy		
+	Appropriate One Planet developments will be inherently sustainable and yield biodiversity and landscape benefits.	
Recommendation: No changes to the policy.		

Community Facilities, Retailing, Transport

<p>Policy 48: COMMUNITY FACILITIES & INFRASTRUCTURE REQUIREMENTS (Strategy Policy) The provision and protection of community facilities, infrastructure and services will be achieved as follows:</p> <p>a) With new and extended facilities these will be permitted where they are well located to meet the community's needs and they are convenient to public transport, shops and other services where this is required to serve the needs of the user.</p> <p>b) Development which would adversely affect the operation of a community facility, or results in its loss will not be permitted except where a suitable replacement or enhanced facility is to be made available or where it can be shown the facility is no longer required or is not commercially viable. When considering a new use for a redundant community facility an employment use or affordable housing will be prioritised (see also Policies 42, 43 and 45).</p> <p>c) Planning permission will be granted for proposals that have made suitable arrangements for the improvement or provision of infrastructure, services and community facilities made necessary by the development. Arrangements for provision or improvement to the required standard will be secured by planning conditions attached to a planning permission or in some case planning obligations. The Authority will seek to obtain benefits to contribute to dealing with the most acute areas of need for National Park communities.</p>		
<p>Policy options appraised for the Replacement Local Development Plan Preferred Strategy</p>		<p>Summary of Appraisal</p>
<p>Option 1: The provision and protection of community facilities will be achieved as follows:</p> <p>a) With new and extended facilities these will be permitted where they are well located to meet the community's needs and they are convenient to public transport, shops and other services where this is required to serve the</p>	++	<p>Overall the policy performs well against the SA Objectives particularly 8, 9, 10 and 13, which cover the social and cultural needs of communities in the National Park, as it aims to provide for these needs. Additionally, by aiming to provide facilities in accessible locations, there may also be benefits for the environment and climate change through reduced car use.</p>

<p>needs of the user.</p> <p>b) Development which would adversely affect the operation of a community facility, or results in its loss will not be permitted except where a suitable replacement or enhanced facility is to be made available or where it can be shown the facility is no longer required or is not commercially viable. When considering a new use for a redundant community facility an employment use or affordable housing will be prioritised (see also Policies 42, 43 and 45).</p> <p>c) Planning permission will be granted for proposals that have made suitable arrangements for the improvement or provision of infrastructure, services and community facilities made necessary by the development. Arrangements for provision or improvement to the required standard will be secured by planning conditions attached to a planning permission or in some case planning obligations.</p>		
<p>Option 2: As per option 1 but seeks 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.</p>	++	<p>Overall the policy performs well against the SA Objectives particularly 8, 9, 10 and 13, which cover the social and cultural needs of communities in the National Park, as it aims to provide for these needs. Additionally, by aiming to provide facilities in accessible locations, there may also be benefits for the environment and climate change through reduced car use.</p>
Overall sustainability Appraisal of Policy		
++	<p>Overall the policy performs well against the SA Objectives particularly 8, 9, 10 and 13, which cover the social and cultural needs of communities in the National Park, as it aims to provide for these needs. Additionally, by aiming to provide facilities in accessible locations, there may also be benefits for the environment and climate change through reduced car use.</p>	
<p>Recommendation: Both options are sustainable. The second option allows for prioritisation for areas of acute need where issues arise in terms of the viability of projects.</p>		

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. Specific areas within Tenby will be identified where non retail uses will not be allowed to dominate. The amenity of neighbouring properties will be an important consideration where A3 uses are proposed (see Policy 30).

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

Policy options appraised for the Replacement Local Development Plan Preferred Strategy	Summary of Appraisal	
Options for extents of retail areas		
Option 1: To draw extensive centre boundaries	-	Extensive boundaries have little relationship with many of the sustainability objectives. It would have the potential to undermine the commercial core of centres, may dilute the character of centres and create additional travel.
Option 2: To draw restricted town and district centre boundaries	+	A compact boundary, which focuses new investment within a centre, can help to maintain the townscape, and character and has positive outcomes for sustainability in terms of meeting the needs of the local community.
Options for Centre boundaries		
Option 1: To draw extensive centre boundaries	--	Extensive boundaries have little relationship with many of the sustainability objectives. It would have the potential to undermine the commercial core of centres, may dilute the character of centres and create additional travel.
★✳️Option 2: To draw restricted town and district centre boundaries	+	A compact boundary, which focuses new investment within a centre, can help to maintain the townscape, and character and has positive outcomes for sustainability in terms of meeting the needs of the local community.
Options for retail frontages in Tenby		
Option 1: Retain a primary retail frontage within Tenby town centre.	+	This option is more likely to retain a range of shopping opportunities within the centre, attracting visitors and residents, reducing the need to travel elsewhere for shopping needs.
Option 2: Remove primary retail frontages from Tenby town centre	-	Whilst non retail uses can bring investment and refurbishment to centres, this does not outweigh the impact of reduced shopping opportunities within the centres if they are currently displaying a healthy, vibrant and

		diverse core offer and appear to be functioning well with low vacancy rates.
Option 3: Introduce primary retail frontages with identified centres of the National Park.	+	This option would help to maintain a range of shopping facilities at shopping centres, reducing the need to journey to competing centres. It may also however create an unnecessary level of control that, in times of economic hardship, may lead to long term vacancy rates increasing within smaller Centres, reducing their appeal for residents and visitors. There does not appear to be a trend of increasing non retail uses to the detriment of the retail character, vitality or viability of centres
Overall sustainability Appraisal of Policy		
+	<p>Planning Policy Wales paragraph 10.2.1 requires that development plans establish the existing hierarchy of centres. Once this hierarchy is established, it will enable a set of policies which enable development to take place in appropriate centres and at appropriate scales. This is fully in support of Welsh Government objectives for retailing and town centres. It will encourage vibrant and viable centres.</p> <p>A compact boundary, which focuses new investment within a centre, can help to maintain the townscape, and character, and has positive outcomes for sustainability in terms of meeting the needs of the local community.</p> <p>Retail provision in the smaller centres would make a significant contribution to sustaining, and maintaining distinctive, local communities, and reducing the need to travel for everyday shopping needs.</p>	
Recommendation: No changes to the policy		

Policy 50: Town, District and Local Shopping Centres

Within the town shopping centre of Tenby, and the district shopping centres of Saundersfoot, St Davids and Newport, and other smaller shopping centres changes of use, redevelopment or development of new buildings will be permitted where:

- a) if in a town or district shopping centre the proposal falls within Class A1, A2, A3, B1, C1, D1 or D2 of the use classes order or is a sui generis use normally found in such shopping centres;
- b) if in a smaller centre the proposal is for retail and commercial uses (A1, A2 and A3 uses) and community facilities; and
- c) if it is located within a primary frontage the proposal would not create a concentration of non-retail uses; and
- d) the scale, siting and design is appropriate and would contribute to the character and appearance of the area; and
- e) proposals for A3 uses would not cause unacceptable disturbance to the occupiers of nearby property or adversely affect amenity (see Policy 30).

Policy options appraised for the Replacement Local Development Plan Preferred Strategy		Summary of Appraisal
Overall sustainability Appraisal of Policy		
+	The policy represents a sustainable way of delivering shopping opportunities in the National Park, which should help maintain the centres in terms of viability and character.	
Recommendation: No changes to the policy.		

Policy 51: Garden Centres	
Garden centres will be permitted where:	
<ul style="list-style-type: none"> a) the proposal is located within or adjacent to a Centre; and b) the proposal would not undermine the vitality and viability of retail facilities in any nearby Centre; and c) the scale and nature of any buildings proposed for retail use and the size, design, materials and siting of any new building or extension blend with existing building(s). 	
Policy options appraised for the Replacement Local Development Plan Preferred Strategy	Summary of Appraisal
Overall sustainability Appraisal of Policy	
+/-	Examining this policy against the sustainability framework suggests there may be minor negative impacts upon sustainability; however there are equally positive impacts in terms of the potential boost to local rural economies. Many of the objectives are not relevant.
Recommendation: The policy is likely to minimise the negative effects of garden centres and should not change.	

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:	
<ul style="list-style-type: none"> a) Permitting proposals that assist in delivering improved traffic and parking management. b) Permitting facilities to improve public transport by helping to link between travel modes or providing facilities for passengers. c) Ensuring new development is well designed by providing appropriate access for vehicles, cyclists and pedestrians. d) Not permitting proposals that cause significant concerns about potential transport impacts which cannot be satisfactorily mitigated (Policy 53). 	
Policy options appraised for the Replacement Local Development Plan Preferred Strategy	Summary of Appraisal
Overall sustainability Appraisal of Policy	
+	The policy scores well in sustainability terms as it aims to reduce congestion and improve access to sustainable transport.
Recommendation: No changes to the policy.	

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 the proposal would undermine the vitality and viability of a Centre.
- f) the proposal would undermine the vitality and viability of a Centre.

A Transport Assessment 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.

Policy options appraised for the Replacement Local Development Plan Preferred Strategy		Summary of Appraisal
Overall sustainability Appraisal of Policy		
+	This policy aims to mitigate the environmental and social impacts of traffic for minor positive effects against the SA framework.	
Recommendation: No changes to the policy.		

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.

Policy options appraised for the Replacement Local Development Plan Preferred Strategy		Summary of Appraisal
Overall sustainability Appraisal of Policy		
++	The policy is likely to prove sustainable as it aims to extend opportunities for cycling as an alternative to the private car, and support National Park communities.	
Recommendation: No changes to the policy.		

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.	
Policy options appraised for the Replacement Local Development Plan Preferred Strategy	Summary of Appraisal
Overall sustainability Appraisal of Policy	
+	Will help protect the landscape.
Recommendation: No changes to policy.	

Policy 56: Telecommunications	
Telecommunications development will be permitted provided that:	
<ul style="list-style-type: none"> 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.	
Policy options appraised for the Replacement Local Development Plan Preferred Strategy	Summary of Appraisal
Overall sustainability Appraisal of Policy	
+	Aims to protect the landscape from the negative impacts of telecommunications development.
Recommendation: No changes to the policy.	

Assessing the cumulative impacts of Plan policies

- 5.25 It is a requirement of Sustainability Appraisal and the Strategic Environmental Assessment Directive that the impacts of Plan policies are assessed in combination with other policies (as opposed to in isolation). These combination effects are of two types:
- cumulative effects - effects that arise due to the addition of the effects of a number of objectives;
 - synergistic effects - those that arise from an interaction of the effects of objectives, and can be thought of as effects that are greater than the sum of the parts.
- 5.26 In some cases an in combination assessment is implicit in the assessment of individual policies, for instance, the policy for housing is considered in the context of the policy for Sustainable Design and the spatial policies of the Plan. Assessing the combined impact of every combination of policies is not a practical option.
- 5.27 In order to get a better idea of the cumulative impact of Local Development Plan policies on each of the Sustainability Objectives the summary assessment of each policy against each Sustainability Objective was brought into the table below. From this it is possible to read the impact of the Plan as a whole on each Sustainability Objective. A predominance of negative assessments against a Sustainability Objective would suggest that the plan as a whole will have a negative impact on that objective. This approach is not without its flaws, the main one is the implication that a negative effect from one policy can be offset by a positive effect from another. This may be the case, the positive effect could mitigate against the negative effect, or result in gains that more than make up for the losses due to the negative effect. However it could also be the case that a serious negative effect of one policy will not be offset by the positive effects of others. For this reason a commentary follows the table indicating whether or not the positive effects are likely to offset negative effects where these are foreseen.

Sustainability Appraisal key:

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

Impacts by Sustainability Objective of each Replacement Local Development Plan policy

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

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

14. (Maintain and enhance biodiversity ...)	0	++	+	0	?	+	+	++?	0	+	+	0	0	0	0	-	0	0	0	++	+/-	0	0	+	0	0	0	0	0	0
15. (Promote sustainable use of ... inland and coastal waters.)	0	0/+	+	0	0	+	+	0	0	+	+	0	0	0	-	0	0	0	0	0	?	+	?	+	0	0	0	-	0	

Sustainability Objective	Policy	53	54	55	56																																	
1. (Economically viable agriculture and forestry sectors ...)		0	0	0	0																																	
2. (Locate developments so as to minimise the demand for travel, especially by private car.)		0	++	0	0																																	
3. (Conserve and enhance landscapes, townscapes and seascapes ...)		+	+	+	+																																	
4. (Increase the numbers ... taking part in physical forms of recreation ...)		0	++	0	0																																	
5. (Increase the number of visitors using the National Park outside the peak visitor season.)		0	0	0	0																																	
6. (Manage the effects of climate change ...)		+	0	0	0																																	
7. (Reduce factors contributing to climate change.)		0	+	0	0																																	
8. (Maximise the contribution of ... development to sustaining local communities.)		0	0	0	0																																	
9. (Encourage access for all to the National Park ...)		0	+	0	0																																	
10. (Maintain the cultural distinctiveness of communities.)		0	0	0	0																																	
11. (The adverse effects of minerals exploitation in the National Park decline ...)		0	-	0	0																																	
12. (Reduce the negative impacts of waste.)		0	0	0	0																																	
13. Community facilities		0	+	0	0																																	

... meet the needs of the National Park population																										
14. (Maintain and enhance biodiversity ...)	+	0	0	0																						
15. (Promote sustainable use of ... inland and coastal waters.)	0	0	0	0																						

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

Sustainability Objective 2

- 5.29 A number of policies are likely to, or have the potential to, result in increased car use. Policies 6 and 7 regarding development in Rural Centres and the countryside respectively have the potential to increase car use, though the effects of policies 6 and 7 are restricted given the limited amount of development likely to be proposed in these locations and given that Rural Centres are chosen because they contain some services where day to day needs could be met. Policy 51 has the potential to increase car use as customers typically travel to garden centres by car as their purchases are likely to be bulky, however the requirement that new garden centres are adjacent to settlements should minimise the effects of this. Policy 35 may also increase car use, particularly by visitors, as it allows for countryside locations but only where a countryside location is needed.
- 5.30 The Replacement Local Development Plan Preferred Strategy focuses on housing and affordable housing, and it is expected that the bulk of the development arising from the plan will be housing. Policies 44/45 direct housing development appropriately to the settlements in the settlement hierarchy, which should help to minimise the impacts of the above policies. The sustainable transport policies of the plan will also help to ensure that alternatives to the car for travel will be in place, and result in reductions in car use in other areas and activities to offset any increases caused by the policies that might increase car use.
- 5.31 In order to reduce car use development should be restricted to the Centres where a range of services can be accessed without the need for car travel. The problems with regard to this Sustainability Objective stem mainly from providing for certain forms of development in countryside locations.

Sustainability Objective 7

- 5.32 Policies 6, 7 and 35 have the potential to undermine efforts to reduce factors contributing to climate change due to their potential impact on car use. As stated above the sustainable transport policies of the Plan will help mitigate and offset these effects, and the sustainable design policy (29) will provide other reductions in climate change contributors. Policy 33 may have a negative impact due to the likelihood of it restricting large scale renewable energy schemes. The requirements of policy 29, particularly with regard to renewable energy/low carbon schemes on developments will to some extent mitigate for this by demanding measures to reduce factors leading to climate change where possible. However, it is probably the case that the statutory requirement to protect the landscape of the National Park will prevent the realisation of the full potential renewable energy yield of the area of the National Park

Sustainability Objective 11

- 5.33 There are policies in the Plan (2-6, 20 and 44) to facilitate or direct development. Such development will require mineral resources and therefore these policies could result in increased minerals activity. These minerals could be sourced from less sensitive areas outside the National Park, but that it is likely to result in increased transport distances, which would make the activity less sustainable in that respect than sourcing minerals locally. There are policies in the plan to ensure that such minerals extraction that goes on has as little impact as possible, and further policies that promote minerals recycling and more efficient use of minerals on construction sites. However, it is likely that development will have negative impacts with regard to this Sustainability Objective though these are likely to be acceptable in the context of the social gains likely to arise from the development proposed in the Local Development Plan.

Sustainability Objective 12

- 5.34 The policies in the Plan to facilitate and direct development should result in development and in turn this is likely to generate waste during construction and during the lifetime of the development. The amount of waste generated during construction should be minimised by the requirements of policy 29 (sustainable design). The requirements of policy 29 and policies 27, 28 and 31 should minimise the waste generated and ensure it is managed in the most sustainable way.

Sustainability Appraisal of Candidate Site Submissions

- 5.35 A total of 147 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 80 were found to be compatible with the Sustainability Appraisal Objectives, with a further 5 found to be compatible with suitable mitigation measures. 59 were found to be incompatible with the Sustainability Appraisal Objectives. 3 of the sites submitted will require more detail in order to make an adequate assessment.

6. Monitoring

Monitoring the sustainability impacts of the Plans

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

6.2 Sustainability Appraisal monitoring should be undertaken for the following reasons¹⁰:

- i. To identify whether the predictions of sustainability effects were accurate.
- ii. To identify whether the plan is contributing to the achievement of integrated objectives and targets (including SEA requirements).
- iii. To identify whether mitigation measures are performing as well as expected.
- iv. To identify whether any adverse effects are within acceptable limits or whether remedial action is required ; and
- v. To fill gaps in existing SEA baseline information where relevant and manageable.

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

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

Table 65

Objectives	Potential indicators
Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well-being.	Employment rates in the agriculture; forestry and fishing sector Number of farms in agri-environment schemes (including those in the Authority's management agreements) Conservation status of farmland habitats
Locate developments so as to minimise the demand for travel, especially by private car.	Department for Transport statistics for car use by local authority DECC emission rates for cars by local authority Pembrokeshire County Council public transport figures
Conserve and enhance landscapes, townscapes and seascapes, and all their	Mapped landscape quality indicators Condition of listed buildings and Scheduled

¹⁰ Welsh Government (2015) Local Development Plan Manual

Objectives	Potential indicators
components (including the built environment and archaeology) with reference to the special qualities of the National Park	Ancient Monuments Amount of greenfield and open space lost to development (ha) which is not allocated in the plan.
Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	The activities undertaken by visitors revealed by tourism surveys. Creation or improvement of new cycling and walking opportunities.
Increase the number of visitors using the National Park outside the peak visitor season.	Information from businesses PCNPA car park surveys/ ticket data Application of LDP policy on camping, caravanning and self-catering accommodation.
Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	Amount and nature of development in areas at current or future risk of flooding
Reduce factors contributing to climate change.	Modelled emissions of greenhouse gases Indicators relating to car travel Renewable energy development
Maximise the contribution of the limited opportunities for development to sustaining local communities.	Percentage of new housing that is affordable.
Encourage access for all to the National Park, reflecting the social mix of society.	The social mix of visitors revealed by tourism surveys. Delivery of affordable housing
Maintain the cultural distinctiveness of communities.	Use of Welsh language Condition of listed buildings Delivery of affordable housing
The adverse effects of minerals exploitation in the National Park decline from the present level and the potential biodiversity and landscape gains of former minerals sites are realised.	Number of new/ extensions to minerals sites Number of minerals sites closing/ reducing activity Nature of after-use on closed sites
Reduce the negative impacts of waste.	Waste and recycling rates for Pembrokeshire Incidence of fly tipping
Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	Applications approved for new or improvement to existing community facilities in the National Park Mapped community facilities
Maintain and enhance biodiversity both within and outside designated sites	Conservation status of protected sites, and key habitats and species (likely to be largely qualitative). Application of LDP policy on biodiversity Monitoring of mitigation methods prescribed for developments effecting protected species
Promote sustainable use of, and maintain and enhance the quality of, inland and	Natural Resources Wales river and coastal water quality measurements.

Objectives	Potential indicators
coastal waters.	Performance against Water Framework Directive objectives for the surface, ground and coastal waters in or downstream of the National Park.

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