

Sustainability Appraisal of the Pembrokeshire Coast National Park Replacement Local Development Plan Preferred Strategy May 2017

Appendix B: Detailed Options Appraisal

DRAFT

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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

Sustainability Appraisal of the Pembrokeshire Coast National Park Replacement Local Development Plan Preferred Strategy May 2017

Appendix B: Detailed Options Appraisal

Spatial Strategy

DRAFT

Policy 2: TENBY LOCAL SERVICE AND TOURISM CENTRE (TIER 2); Policy 3: NEWPORT LOCAL CENTRE (TIER 3); Policy 4: SAUNDERSFOOT LOCAL CENTRE (TIER 3); Policy 5: ST DAVIDS LOCAL CENTRE (TIER 3); Policy 6: RURAL CENTRES (TIER 4); Policy 7: COUNTRYSIDE (TIER 5)				
Option exclusivity: 1 or 2		Option 1: Adopt and complement the Wales Spatial Plan approach for the Pembrokeshire Haven area when defining a settlement hierarchy.		Option 2: Continue with the current Joint Unitary Development Plan approach.
SA Objective	Summary	Commentary	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well-being.	+/-	Placing some pressure on using agricultural land but may lead to financial contributions to the farming community.	+/-	Places some pressure on using agricultural land but may lead to financial contributions to the farming community.
2. Locate developments so as to minimise the demand for travel, especially by private car	+	The locations chosen are likely to be more accessible.	-	Some locations for development would not be as accessible as the first option.
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	+	Working within environmental capacity.	+	Working within environmental capacity.
4. Increase the number of residents and visitors taking part in physical	0	Protection of the National Park is likely to ensure no decrease but unlikely to secure an increase.	0	Protection of the National Park is likely to ensure no decrease but unlikely to secure an increase.

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.	0	Protection of the National Park is likely to ensure no decrease but unlikely to secure an increase.	0	Protection of the National Park is likely to ensure no decrease but unlikely to secure an increase.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	+	See 2 above and working with environmental capacity.	+/-	See 2 above and working within environmental capacity.
7. Reduce factors contributing to climate change.	+	See above	+/-	See above.
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	++	This strategy is more focused on delivering prioritised needs.	+	Some prioritising taking place.
9. Encourage access for all to the National Park, reflecting the social mix of society.	+/-	Greater emphasis on delivery of affordable housing but this may be at 'the expense' of meeting demands for all.	+/-	See across but to a lesser extent.
10. Maintain the cultural distinctiveness of communities.	++	The strategy is quite tailored to the uniqueness of individual centres.	+	The strategy is supportive of allowing development commensurate with the character of the villages and towns but not quite as tailored as that first option.
11. The adverse effects of minerals exploitation	-	Any development is likely to demand minerals, and it is not unlikely that at least	-	Any development is likely to demand minerals, and it is not unlikely that at least some of these will originate in

in the National Park decline from the present level and the potential biodiversity and landscape gains of former minerals sites are realised.		some of these will originate in the National Park.		the National Park.
12. Reduce the negative impacts of waste.	-	Waste will be generated as a consequence of any new development.	-	Waste will be generated as a consequence of any new development.
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	+	Directs development towards locations with extensive community facilities (by rural area/ National Park standards). As such it is likely to provide the 'critical mass' to maintain and possibly enhance these facilities.	+/-	The strategy could direct development to locations with no facilities and away from villages and towns. However it could support locations with an extremely limited number of facilities.
14. Maintain and enhance biodiversity both within and outside designated sites	+	Working within environmental capacity.	+	Working within environmental capacity.
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	+	Working within environmental capacity	+	Working within environmental capacity.
Overall assessment and suggested changes	+	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.	+/-	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.
Recommendation	This first option contributes more to the sustainability objectives.			

Policy 7: COUNTRYSIDE (TIER 5)

(a) Infilling and rounding off

Option exclusivity:	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		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.		Option 3: Infill and rounding off for affordable housing only.		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.	
SA Objective	Summary	Commentary	Summary	Commentary	Summary	Commentary	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well-being.	+	The policy option may help to provide affordable housing for farm workers or persons in related industries. However, the strict requirement for affordable housing reduces the financial return for developers and land owners and may discourage development. The option also	+/-	May help to secure the future of agriculture businesses by reducing restrictions on new homes for owners and families of owners. Conversely may also encourage market development in the countryside,	+/-	May help to provide affordable housing for farm workers or persons in related industries. However, the strict requirement for affordable housing reduces the financial return	+/-	The policy does not rule out the construction of affordable homes and requires contributions on market housing, which may help to provide affordable housing for

		specifically considers patterns of development and character of the surrounding area and may help to minimise landscape impacts. Conservation of the landscape is part of this SA Objective.		which may have short term benefits but does not help to sustain the local agricultural/forestry economy.		for developers and land owners.		farm workers or persons in related industries where opportunities arise in the community. However, requirement for affordable housing contributions on market housing reduces the financial return for developers and land owners.
2. Locate developments so as to minimise the demand for travel, especially by private car	+	This policy option stipulates that the release of land would be dependent on accessibility and may help reduce the need to travel.	-	With no accessibility requirements, on market housing, use of private car to travel between housing and employment is likely to be encouraged by this policy approach.	?	With no accessibility requirements use of private car to travel between housing and employment is likely to be encouraged by this policy approach. However, Affordable Housing can include	+	The policy only allows infilling and rounding off in accessible locations, which may help to reduce the need to travel by private car.

						occupancy controls so that they provide for example: accommodation for existing households needing separate accommodation in the area or people whose work provides essential services and who need to live closer to the local community. This can help reduce the need to travel.		
3. Conserve and enhance landscapes, townscapes and seascapes, and all their components (including the built environment and archaeology) with reference to the special	++	This policy option stipulates that the release of land would be dependent on character and aims to avoid developments that impact on townscape and landscape.	0	Design and landscape elements of housing development are controlled by other policies.	0	Design and landscape elements of housing development are controlled by other policies.	0	Design and landscape elements of housing development are controlled by other policies

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.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
5. Increase the number of visitors using the National Park outside the peak visitor season.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	0	Flood risk and protection of biodiversity policies will ensure that developments are not located so as to contribute to these potential effects of climate change.	0	Flood risk and protection of biodiversity policies will ensure that developments are not located so as to contribute to these potential effects of climate change.	0	Flood risk and protection of biodiversity policies will ensure that developments are not located so as to contribute to these potential effects of climate change.	0	Flood risk and protection of biodiversity policies will ensure that developments are not located so as to contribute to these potential effects of climate change.
7. Reduce factors	+/-	See SA Objective 2,	-	See SA	-	See SA	+	See SA

<p>contributing to climate change.</p>		<p>policy option stipulates accessibility to centres.</p> <p>Any new development is likely to increase greenhouse gas emissions.</p>		<p>Objective 2, potential for increased greenhouse gas emissions from private car use.</p> <p>Developments in remote locations have the potential to require more energy and resources to provide and maintain the necessary infrastructure.</p>		<p>Objective 2, potential for increased greenhouse gas emissions from private car use.</p> <p>Developments in remote locations have the potential to require more energy and resources to provide and maintain the necessary infrastructure.</p>		<p>Objective 2, potential for increased greenhouse gas emissions from private care use.</p> <p>Developments in remote locations have the potential to require more energy and resources to provide and maintain the necessary infrastructure.</p>
<p>8. Maximise the contribution of the limited opportunities for development to sustaining local communities.</p>	<p>++</p>	<p>In most Community Council areas the main need of the community is affordable housing. This option may help to sustain rural communities by providing affordable homes to enable families to remain within an area.</p>	<p>-</p>	<p>In most Community Council areas the main need of the community is affordable housing. This option is more likely to deliver holiday lets or market housing when the evidenced need is for affordable housing.</p>	<p>++</p>	<p>In most Community Council areas the main need of the community is affordable housing. This option may help to sustain rural communities by providing affordable homes to</p>	<p>+</p>	<p>The policy option does not rule out the provision of affordable housing and requires an affordable housing contribution on market housing. The option may help to provide</p>

						enable families to remain within an area.		affordable housing within those local communities in the National Park.
9. Encourage access for all to the National Park, reflecting the social mix of society.	++	This option requires that infill and rounding off be in accessible locations only.	-	By restricting affordable housing in the countryside, this option potentially restricts opportunities for some National Park communities to reflect the social mix of society.	-	By restricting market housing in the countryside, this option potentially restricts opportunities for some National Park communities to reflect the social mix of society.	+	This option requires that infill and rounding off be in accessible locations only and precludes market housing in inaccessible locations, which is likely to be more socially inclusive for both visitors and residents.
10. Maintain the cultural distinctiveness of communities.	+	This option, with regard to Sustainability Objective 8, will help ensure that the people making up the community have sufficient opportunity to remain within it. The incidence of infill	-	This option may favour holiday properties, second homes or market housing beyond the reach of local people and may encourage out-migration eroding	+	This option, with regard to Sustainability Objective 8, will help ensure that the people making up the community have sufficient	+	This option, with regard to Sustainability Objective 8, will help ensure that the people making up the community have sufficient

		development within any given community is likely to be small and the effect on the overall character small as a result helping to maintain local distinctiveness.		the local culture and potentially diluting the use of Welsh language. Potentially provides more opportunities for the cross subsidy for affordable housing provision within local communities.		opportunity to remain within it. The incidence of infill development within any given community is likely to be small and the effect on the overall character small as a result helping to maintain local distinctiveness		opportunity to remain within it. The incidence of infill development within any given community is likely to be small and the effect on the overall character small as a result helping to maintain local distinctiveness.
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.	-	Any development is likely to demand minerals, for small local developments in particular it is likely that some of these minerals will originate in the National Park.	-	Any development is likely to demand minerals, for small local developments in particular it is likely that some of these minerals will originate in the National Park.	-	Any development is likely to demand minerals, for small local developments in particular it is likely that some of these minerals will originate in the National Park.	-	Any development is likely to demand minerals, for small local developments in particular it is likely that some of these minerals will originate in the National Park.
12. Reduce the negative impacts	-	Waste will be generated as a	-	Waste will be generated as a	-	Waste will be generated as a	-	Waste will be generated as

of waste.		consequence of any new development.		consequence of any new development.		consequence of any new development.		a consequence of any new development.
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	+	This option requires that all infill be in accessible locations, prioritises affordable housing before all other uses of infill sites and may increase access to community facilities. In doing so helping to maintain their viability.	-	Second and holiday homes can reduce the population of communities to a point where the provision of certain services is no longer viable. Market housing in inaccessible locations will reduce accessibility to community facilities.	-	If services are to meet the needs of National Park communities they need to be accessible to those communities.	-	Affordable housing in inaccessible locations will reduce accessibility to community facilities.
14. Maintain and enhance biodiversity both within and outside designated sites	0	Other LDP policy will help to prevent unacceptable impacts to biodiversity.	0	Other LDP policy will help to prevent unacceptable impacts to biodiversity.	0	Other LDP policy will help to prevent unacceptable impacts to biodiversity. .	0	Other LDP policy will help to prevent unacceptable impacts to biodiversity. .
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.

<p>Overall assessment and suggested changes</p>	<p style="text-align: center;">++</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 style="text-align: center;">-</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 style="text-align: center;">-</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 style="text-align: center;">+</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>
<p>Recommendation</p>	<p>Option 1 is the most compatible with the SA objectives. No changes recommended.</p>							

Policy 7: COUNTRYSIDE (TIER 5)

d). Conversion of buildings in the countryside

Option exclusivity: 1, 2, 3, 4 or 5	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. Also allow self-catering if in the Tenby Tourism Growth area. ¹	Option 2(Current Policy 7d): it constitutes the conversion of appropriate buildings to a range of uses with affordable housing being 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.	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. ²	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.	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.					
SA Objective	Summary	Commentary	Summary	Commentary	Summary	Commentary	Summary	Commentary	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are	-	If buildings are not suitable for full residential use, their use within the farm	+	Gives greater scope for farms to utilise buildings than option 1.	++	Gives less scope than option 2 for farms to utilise buildings.	+/-	Gives good scope for farms to utilise buildings. This option	++	This option provides the best scope for farms to utilise buildings.

¹ This would allow a range of uses except in specific circumstances for self-catering. Residential uses can be demanding on the fabric of buildings. Limiting the distance from services should make reuse a more sustainable option.

² This would be more in keeping with Planning Policy Wales. This would be a less sustainable option in terms of accessibility and would not take account of the level of existing self-catering accommodation provision.

<p>contributing to conserving and enhancing landscape, biodiversity and community well-being.</p>		<p>business for self-catering holidays would not be permitted outside the Tenby TGA, restricting opportunities for non-diversification conversion schemes.</p>				<p>It is more difficult to change use to full residential and realise the value of buildings through sale, which is likely to result in more buildings being converted to holiday lets. This may be a more sustainable business option in the medium to long term.</p>		<p>also reduces the barriers to converting to full residential should said economic uses become unviable. However, the sale of these buildings is unlikely to represent a long term sustainable business option (farm will at some stage run out of buildings to sell).</p> <p>Option rules out opportunities to provide affordable housing for some rural enterprise workers.</p>		<p>Affordable housing contributions may help to provide affordable housing in the locality for rural enterprise workers, and contribute to community well-being. However, the sale of these buildings is unlikely to represent a long term sustainable business option (farm will at some stage run out of buildings to sell).</p>
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<p>2. Locate developments so as to minimise the demand for travel, especially by private car</p>	<p style="text-align: center;">+</p>	<p>The requirement for accessibility to towns and villages may reduce the need for travel by car, if the employment related use requires employees from the wider community.</p>	<p style="text-align: center;">+</p>	<p>Accessibility, via public transport, to centres is a key consideration.</p>	<p style="text-align: center;">-</p>	<p>Could encourage car travel to employment sites in remote places.</p>	<p style="text-align: center;">-</p>	<p>With no accessibility restrictions, this policy approach may encourage use of the private car by tourists, employees or residents.</p>	<p style="text-align: center;">-</p>	<p>With no accessibility restrictions, this policy approach may encourage use of the private car by tourists, employees or residents.</p>
<p>3. Conserve and enhance landscapes, townscapes and seascapes, and all their components (including the built environment and archaeology) with reference to the</p>	<p style="text-align: center;">++</p>	<p>Will help secure the future of valuable buildings in the countryside by allowing appropriate reuse, provided that conversions are appropriate in terms of scale, form and materials</p>	<p style="text-align: center;">++</p>	<p>Will help secure the future of valuable buildings in the countryside by allowing appropriate reuse, provided that conversions are appropriate in terms of scale, form and materials.</p>	<p style="text-align: center;">+</p>	<p>Will help secure the future of valuable buildings in the countryside by allowing reuse, though perhaps not as effectively as the other two options as the potential uses are more restricted,</p>	<p style="text-align: center;">++</p>	<p>Will help secure the future of valuable buildings in the countryside by allowing appropriate reuse, provided that conversions are appropriate in terms of scale, form and materials</p>	<p style="text-align: center;">++</p>	<p>Will help secure the future of valuable buildings in the countryside by allowing appropriate reuse, provided that conversions are appropriate in terms of scale, form and materials.</p>

special qualities of the National Park					and there is not consideration of the contribution to the character of the area.					
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	?	Dependent on location this policy approach may result in more tourism accommodation in places with walking/cycling opportunities, which would generally require access by car, being close by. Conversely, the policy approach could equally result in tourism accommodation with no	?	Dependent on location this policy approach may result in more tourism accommodation in places with walking/cycling opportunities, which would generally require access by car, being close by. Conversely, the policy approach could equally result in tourism accommodation with no opportunities nearby. Therefore the effect on this SA Objective is uncertain.	?	Dependent on location this policy approach may result in more tourism accommodation in places with walking/cycling opportunities, which would generally require access by car, being close by. Conversely, the policy approach could equally result in tourism accommodation with no	?	Dependent on location this policy approach may result in more tourism accommodation in places with walking/cycling opportunities, which would generally require access by car, being close by. Conversely, the policy approach could equally result in tourism accommodation with no	?	Dependent on location this policy approach may result in more tourism accommodation in places with walking/cycling opportunities, which would generally require access by car, being close by. Conversely, the policy approach could equally result in tourism accommodation with no

		opportunities nearby. Therefore the effect on this SA Objective is uncertain.				opportunities nearby. Therefore the effect on this SA Objective is uncertain.		opportunities nearby. Therefore the effect on this SA Objective is uncertain.		opportunities nearby. Therefore the effect on this SA Objective is uncertain.
5. Increase the number of visitors using the National Park outside the peak visitor season.	+	More availability of self-catering may encourage additional visitor numbers outside the peak visitor season but only in the Tenby Tourism Growth Area.	+	More availability of self-catering may encourage additional visitor numbers outside the peak visitor season.	+	More availability of self-catering may encourage additional visitor numbers outside the peak visitor season.	+	More availability of self-catering may encourage additional visitor numbers outside the peak visitor season.	+	More availability of self-catering may encourage additional visitor numbers outside the peak visitor season.
6. Manage the effects of climate change with particular reference to the risk of flooding;	0	Flood risk and protection of biodiversity policies will ensure that developments are not located so	0	Flood risk and protection of biodiversity policies will ensure that developments are not located so as to contribute to	0	Flood risk and protection of biodiversity policies will ensure that developments are not located so	0	Flood risk and protection of biodiversity policies will ensure that developments are not located so	0	Flood risk and protection of biodiversity policies will ensure that developments are not located so

the effect on biodiversity ; public health.		as to contribute to these potential effects of climate change.		these potential effects of climate change.		as to contribute to these potential effects of climate change.		as to contribute to these potential effects of climate change.		as to contribute to these potential effects of climate change.
7. Reduce factors contributing to climate change.	-/+	See note on car use. Self-catering accommodation represents an energy using building that is not housing a full time household (i.e. is extra housing to heat and light beyond the basic housing needs of the population) SPG covering sustainable development should help to	+	The purpose of the option is to reduce development in the countryside only facilitating it in defined circumstances, so generally development that is unsustainable in greenhouse gas terms is likely to be reduced.	-/+	See note on car use. Self-catering accommodation represents an energy using building that is not housing a full time household (i.e. is extra housing to heat and light beyond the basic housing needs of the population) See comments for option 1. It also is making use	-	See 2 above.	-	See 2 above.

		<p>ensure that buildings are as energy efficient as possible – possible use as ‘role models’. At least with a conversion the planning authority can impose conditions to make it energy efficient. It also is making use of an existing resource rather than new build. See comments under the options for Policy 29 about the dangers of modern energy requirements relating to traditional</p>			<p>of an existing resource rather than new build.</p>				
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		buildings. Importantly, these buildings have embodied energy and are culturally distinct, part of the overall landscape								
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	+/-	Allows for a range of uses including affordable housing. Full residential use could mean a house is used as a second home. Restricts the use that buildings can be put to but as the main restriction is	+/-	The lack of restriction on use means that buildings can be used to meet community needs. Conversely buildings can also be used for uses that do not reflect community need.	--	In most areas the main need of the community is for affordable housing. This option is the most difficult for securing that kind of use.	+/-	Allows for a range of uses but excludes a requirement for affordable housing in inaccessible locations. The conversion of buildings to full residential could mean a building is converted to a second home, this along with	+?	Allows for a range of uses. There is the potential for the provision of employment opportunities, and affordable housing, which could help to sustain local communities. Conversely, the conversion

		<p>on self-catering which is least likely to meet community needs this option could be viewed as positive with regard to this Sustainability Objective.</p>					<p>conversions to self-catering are least likely to meet community needs.</p> <p>Conversion to employment uses could provide employment opportunities in the local area but excluding contributions to affordable housing may also reduce the opportunities for local people to live and work in their communities.</p> <p>The effect on this SA Objective</p>		<p>of buildings to full residential (after a contribution is sought) or self-catering is not likely to help meet community needs, particularly if a market house becomes a second home.</p> <p>This option is more compatible with the SA Objective than Option 4 due to the requirement for affordable housing contributions.</p>
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								will be positive or negative depending on the end use of the converted building.		
9. Encourage access for all to the National Park, reflecting the social mix of society.	+	This option asks for the reuse to be in locations that will be accessible which would be more socially inclusive.	+	This includes accessibility as an important consideration.	-	This option does not ask for the buildings to be in an accessible location.	-	This option specifies that there will be no affordable housing permitted in inaccessible locations but places no other restrictions on uses. Specifying accessible locations would be more socially inclusive.	-	This option allows for a full range of uses and does not preclude affordable housing in inaccessible locations. Specifying accessible locations would be more socially inclusive.
10. Maintain the cultural distinctiveness of communities.	?	The effect on the SA Objective is uncertain. Particular uses such as holiday lets restrict	?	The effect on the SA Objective is uncertain. Particular uses such as holiday lets restrict how a building is used and who	-	This option favours holiday let reuse, shifting communities to a holiday	-/?	The effect of a change in building use on the SA Objective is uncertain. Particular	?	The effect of a change in building use on the SA Objective is uncertain. Particular

		how a building is used and who can use it.		can use it.		culture.		uses such as holiday lets restrict how a building is used and who can use it. In addition this option also rules out opportunities to provide affordable housing for rural enterprise workers, which may prevent people from continuing to live in their community.		uses such as holiday lets restrict how a building is used and who can use it.
11. The adverse effects of minerals exploitation in the National	0	Though converted buildings might otherwise have been a source of	0	Though converted buildings might otherwise have been a source of reclaimed building	0	Though converted buildings might otherwise have been a source of	0	Though converted buildings might otherwise have been a source of	0	Though converted buildings might otherwise have been a source of

Park decline from the present level and the potential biodiversity and landscape gains of former minerals sites are realised.		reclaimed building materials it is unlikely that the scale of this resource will make a difference to the demand for minerals from the National Park.		materials it is unlikely that the scale of this resource will make a difference to the demand for minerals from the National Park.		reclaimed building materials it is unlikely that the scale of this resource will make a difference to the demand for minerals from the National Park.		reclaimed building materials it is unlikely that the scale of this resource will make a difference to the demand for minerals from the National.		reclaimed building materials it is unlikely that the scale of this resource will make a difference to the demand for minerals from the National
12. Reduce the negative impacts of waste.	-	Waste will be generated. The sustainable design policy of the Plan to address.	-	Waste will be generated. The sustainable design policy of the Plan to address.	-	Waste will be generated. The sustainable design policy of the Plan to address.	-	Waste will be generated. The sustainable design policy of the Plan to address.	-	Waste will be generated. The sustainable design policy of the Plan to address.
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to	+	Community facilities are likely to be centre based. The protection of existing community facilities is considered by policy 48.	+	Community facilities are likely to be centre based. The protection of existing community facilities is considered by policy 48. Encourages	?	Community facilities are likely to be centre based. The protection of existing community facilities is considered by policy 48.	?	Community facilities are likely to be centre based. The protection of existing community facilities is considered by policy 48.	?	Community facilities are likely to be centre based. The protection of existing community facilities is considered by policy 48.

meet the needs of the National Park population		Encourages development in locations with greater accessibility to centres.		development in locations with greater accessibility to centres.		Option allows for building conversion in both accessible and inaccessible locations.		Option benefits those that need affordable but may reduce access to facilities for market housing and self-catering.		Option allows for building conversion in both accessible and inaccessible locations.
14. Maintain and enhance biodiversity both within and outside designated sites	+	Building conversion can lead to biodiversity enhancement.	+	Building conversion can lead to biodiversity enhancement.	+	Building conversion can lead to biodiversity enhancement.	+	Building conversion can lead to biodiversity enhancement.	+	Building conversion can lead to biodiversity enhancement.
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.

Overall assessment and suggested changes	+	There may be some boundary issues with the Tenby TGA. It is defined as a radius of 6 miles around Tenby, resulting in a fuzzy area. Not allowing self-catering outside Tenby TGA may preclude such a use where full residential use is inappropriate in any case.	+	This option is the most compatible with the SA Objectives. Aside from the potential landscape/townscape benefits of conversion 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.	-	This option will make it difficult to secure affordable housing. Lack of reference to landscape character means that conversions could be potentially detrimental to the Park's special qualities. This would however be considered as part of a suite of generic policy considerations.	-	This option will make it difficult to secure affordable housing in more remote locations. There are no accessibility requirements for non-affordable housing developments.	-	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.
Recommendation	The second option is the most sustainable option.									

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Appendix B: Detailed Options Appraisal

Section A: Special Qualities

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Policy 8: SPECIAL QUALITIES				
Option exclusivity: 1 or 2	Option 1: To continue with the green wedges identified within the Joint Unitary Development Plan. ³		Option 2: Review the need for, and the extent of green wedges within the Local Development Plan. ⁴	
SA Objective	Summary	Commentary	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well-being.	0	See overall assessment.	+ ?	Development justified for agricultural or forestry needs is permitted within green wedges. Green wedges can help to retain land for agriculture and forestry purposes
2. Locate developments so as to minimise the demand for travel, especially by private car	0		0	The policy is unlikely to prove relevant to this Sustainability Objective.
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	0		++?	If green wedges are an effective way of protecting the landscape from inappropriate development, then a review that defines appropriate green wedges (assuming landscape is the primary consideration in the review) will conserve and enhance the landscape around settlements.
4. Increase the number of residents and visitors	0		0	Green Wedges may include public footpaths, for which their recreational value would be safeguarded

³ Such an approach does not take account of Welsh Government requirement to review the need for and extent of green wedges as part of the development plan process.

⁴ A review of green wedges would provide a justification for the continued use of green wedges, their amendment, or abandonment. The National Park Authority will liaise with Pembrokeshire County Council where areas lie within the jurisdiction of both planning authorities.

taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.					from development.
5. Increase the number of visitors using the National Park outside the peak visitor season.	0			0	The policy is unlikely to prove relevant to this Sustainability Objective.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	0			0	Green Wedges can act as natural soakaways within a settlement's drainage network.
7. Reduce factors contributing to climate change.				0	Green wedges can include woodland which act as carbon sinks. These would be safeguarded from development.
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	0			-?	Green wedges, if retained within the development plan, could restrict the opportunities for development in support of sustainable communities.
9. Encourage access for all to the National Park, reflecting the social mix of society.	0			0	The policy is unlikely to prove relevant to this Sustainability Objective.
10. Maintain the cultural distinctiveness of communities.	0			0	Over prescription of green wedges may restrict development to the detriment of local communities. However, where appropriate, they can help to maintain the visual attractiveness as a defining factor of settlements and the quality of life for residents.

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.	0		0	The policy is unlikely to prove relevant to this Sustainability Objective.
12. Reduce the negative impacts of waste.	0		0	The policy is unlikely to prove relevant to this Sustainability Objective.
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	0		-?	Green wedges, if retained within the development plan, could restrict the opportunities for development for community facilities.
14. Maintain and enhance biodiversity both within and outside designated sites	0		+?	Green wedges can help to maintain wildlife.
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	0		0	The policy is unlikely to prove relevant to this Sustainability Objective.

<p>Overall assessment and suggested changes</p>		<p>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.</p>	<p>+?</p>	<p>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.</p>
<p>Recommendation</p>	<p>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.</p>			

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Appendix B: Detailed Options Appraisal

Section B: Major Development, the potential for Growth

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Paragraph 4. Ministry of Defence				
Option exclusivity: 1 or 2	Option 1: Allow limited operational development on the ranges subject to mitigation measures and only allow proposals for significant intensification or alteration of use or extensions to sites where they have been subject to the most rigorous examination and only permitted in exceptional circumstances (the major development test – see Scale and Location of Growth Section). ⁵		Option 2: Allow limited operational development on the ranges and proposals for significant intensification of use on the ranges subject to mitigation measures being put in place. Extension proposals to be subject to the major development test. ⁶	
SA Objective	Sum- mary	Commentary	Sum- mary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well-being.	+/-	Proposals may be sited on good quality agricultural farmland and not be suitable or the purchase of farmland could bring money into the farming community.	+/-	Proposals may be sited on good quality agricultural farmland and not be suitable or the purchase of farmland could bring money into the farming community.
2. Locate developments so as to minimise the demand for travel, especially by private car	-?	There may be trip generation but the appraisal process would need to consider the implications of traffic generation.	-?	A more lenient approach may result in greater trip generation.
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	+	A more rigorous examination is likely to ensure that this objective is achieved.	-	A more lenient approach could result in an adverse impact.

⁵ This is the approach set out in the Joint Unitary Development Plan.

⁶ This would be inconsistent with the major development test in national planning policy.

Park				
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	0	A more rigorous investigation of issues is likely to ensure there isn't a negative impact. It is unlikely to cause a positive impact.	-	A more lenient approach could result in an adverse impact.
5. Increase the number of visitors using the National Park outside the peak visitor season.	0	A more rigorous investigation of issues is likely to ensure there isn't a negative impact. It is unlikely to cause a positive impact.	-	A more lenient approach could result in an adverse impact.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	+	A more rigorous approach is likely to ensure this is achieved.	-	A more lenient approach could result in an adverse impact.
7. Reduce factors contributing to climate change.	+	A more rigorous approach is likely to ensure this is achieved.	-	A more lenient approach could result in an adverse impact.
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	0	Sites are remote from local communities.	0	Sites are remote from local communities.
9. Encourage access for all to the National Park, reflecting the social mix of society.	+	A more rigorous approach would ensure a proper assessment of impacts and the potential for increased access to MOD developments in any new proposal.	-	A more lenient approach may reduce access opportunities.
10. Maintain the cultural	+	A more rigorous approach would ensure a	-	A more lenient approach may cause damage.

distinctiveness of communities.		proper assessment of impacts.		
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.	-	Likely to use minerals in development.	-	Likely to use minerals in development.
12. Reduce the negative impacts of waste.	-	Any development is likely to use generate waste.	-	Any development is likely to generate waste.
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
14. Maintain and enhance biodiversity both within and outside designated sites	+	A more rigorous examination of the development would be undertaken and protection is more likely	-	A more lenient approach may cause damage.
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	+	A more rigorous examination of the development would be undertaken and protection is more likely.	-	A more lenient approach may cause damage.

Overall assessment and suggested changes	+	<p>Negative impacts in terms of the development itself are inevitable but these could seek to be addressed through the Sustainable Design policies and transport policies of the Plan.</p> <p>This option contributes more to the sustainability objectives.</p>	-	<p>Negative impacts in terms of the development itself are inevitable but these could seek to be addressed through the Sustainable Design policies and transport policies of the Plan.</p>
Recommendation	Option 1 is more likely to achieve the sustainability objectives.			

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Policy 20: SCALE OF GROWTH				
Option exclusivity: 1 or 2	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. ⁷		Option 2: To seek to achieve Welsh Government projections for the area. ⁸	
SA Objective	Summary	Commentary	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well-being.	0	National planning policy conserves the best and most versatile agricultural land (4.10). There is unlikely to be an impact.	0	See across.
2. Locate developments so as to minimise the demand for travel, especially by private car	-	A net increase in journeys by private car is likely.	--	A net increase in journeys by private car is likely; this could be more significant than under option 1 dependent on projections.
3. Conserve and enhance landscapes, townscapes and	++	Directly related to achieving this sustainability objective.	-	Potential to undermine when wholly reliant on projections.

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Population and Household projections: The overall household growth for the Park as derived from Welsh Government's 2008-based household projections indicate that a total of an estimated 818 new homes would be expected between 2015 and 2031. The Welsh Government has more recently published housing forecasts for local authority areas (2011 based) which show a growth in housing (if considered on a pro rata basis for the National Park) to be 622 dwellings for the same period, 2013 household projections produced show a decline in households in the National Park by 2031. The background to this decline is that the number of deaths in the National Parks is estimated to be more than the number of births and more people are expected to leave the area than move in. Affordable Housing Need: The Local Housing Market Assessment suggests there is a significant need for affordable housing in the National Park, an estimated annual requirement of 370 units for the period 2014 to 2019. Completion Rates: Building rates fluctuate significantly in Pembrokeshire and there has been a considerable drop in completions during the most recent recession. These build rates suggest that the development industry in Pembrokeshire is largely responsive to the overall housing market and economy. Development in Pembrokeshire is largely bespoke rather than speculative. The 2004 to 2014 annual completion rate was 57 residential units per annum.

⁸ See previous footnote. This could range from no growth to 818 dwellings over the Plan period depending on which projections are relied upon.

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.	0	Likely to ensure the National Park remains an attractive place to visit. Unlikely to lead to an increase in visitors.	-	May lead to a decrease if the Park becomes a less attractive place to visit. Also see SA Objective 3.
5. Increase the number of visitors using the National Park outside the peak visitor season.	0	See above.	-	See above.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	+/-	See SA Objective 2. Working with the National Park special qualities indicates that this approach aims to work within environmental limits and is less likely to exacerbate the effects of climate change.	--	See SA Objective 2, scale of growth proposed may place pressure on biodiversity and development leading to the risk of flooding that cannot be mitigated by other LDP policy.
7. Reduce factors contributing to climate change.	-	Working with the National Park's special qualities in mind will help to ensure that the National Park's natural carbon sinks are protected. Growth will still lead to increased energy use and waste and therefore increased carbon emissions some of which can be mitigated through sustainable design but a net increase in carbon emissions is inevitable.	--	See across, this option could to reduce the National Park's capacity to sequester carbon if significantly more growth was proposed.

8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	+	Policy option aims to meet the needs of local communities where compatible with National Park special qualities. However, the capacity to do so will be constrained by those qualities.	+/-	Does not recognise that the opportunities may need to be constrained to protect the National Park's special qualities.
9. Encourage access for all to the National Park, reflecting the social mix of society.	+/-	Focuses on affordable housing and may allow a greater social mix to live in the National Park. However, may not provide for the needs of communities in the National Park.	+/-	May deliver a wider range of housing types than option 1 but does not focus on specific identified needs.
10. Maintain the cultural distinctiveness of communities.	+/-	Providing for local people can enhance local distinctiveness where this is fundamental to the community. However, if new development resulted in for example additional second homes this could dilute whereas if they were safeguarded for affordable housing then this could potentially enhance.	+/-	Depends on whether the change can enhance or dilute. If new development resulted in for example additional second homes this could dilute whereas if they were safeguarded for affordable housing then this could potentially enhance.
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.	-	Development will demand minerals, for small local developments in particular it is likely that some of these minerals will originate in the National Park.	--	Development will demand minerals, for small local developments in particular it is likely that some of these minerals will originate in the National Park.
12. Reduce the negative impacts of waste.	-	Waste will be generated by development both during construction and operation.	-	Waste will be generated by development both during construction and operation.
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the	+/-	Providing for the local population is more likely to be supportive of local facilities but less development may mean less money generated through planning contributions.	+/-	Providing for the local population is more likely to be supportive of local facilities but less development may mean less money generated through planning contributions.

National Park population				
14. Maintain and enhance biodiversity both within and outside designated sites	+	Compatible with the Plan areas special qualities.	-	LDP policy on biodiversity can help to avoid unacceptable impacts. However, in some cases, the scale of development required by relying on projections may be too great for some impacts to be avoided.
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	+	Compatible with the Plan areas special qualities.	-	Likely to lead to greater pressure on this resource.
Overall assessment and suggested changes	+/-	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.	-	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.
Recommendation	The first option is preferred. The policy could usefully articulate the National Park Authority's approach to growth in areas. The focus predominantly about housing.			

Policy 27: Local Waste Management Facilities				
Option exclusivity: 1 or 2		Option 1: The National Park accommodates regional waste facilities. ⁹		Option 2: Should the National Park Accommodate local community waste facilities? ¹⁰
SA Objective	Summary	Commentary	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well-being.			0	The policy is unlikely to prove relevant to this Sustainability Objective.
2. Locate developments so as to minimise the demand for travel, especially by private car			0	In order to accord with national and local planning policy any new waste management sites would need to be located on existing waste management sites or B2 industrial sites and be conveniently located in relation to the needs of the community. The development of new sites in isolated locations is unlikely to be supported.
3. Conserve and enhance landscapes, townscapes and seascapes, and all their components (including the built environment)			+	Local, small scale waste recycling schemes can be more readily accommodated within or near to settlements, and are less likely to impact on landscape or townscapes.

⁹ The National Parks of Wales are waste planning authorities, but have no waste collection or disposal responsibility. Regional waste facilities would serve the region as a whole. The South West Wales region comprises Bridgend, Carmarthenshire, Ceredigion, Neath Port Talbot, Pembrokeshire and Swansea authorities. National Parks are excluded from areas considered appropriate for sub-regional waste facilities (those which serve more than one local authority but not the region as a whole) due to their landscape designation status (see The South West Wales Regional Waste Plan First Review 2008, Appendix J: Areas of Search for New Facilities).

¹⁰ Local, small scale community based schemes, such as the civic amenity and recycling at St Davids, are already located within the National Park. Typically they include recycling bins for a range of materials, bulk storage bins (for landfill). There are also a network of community based bring sites. These can comprise paper and can banks for example

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.			0	The policy is unlikely to prove relevant to this Sustainability Objective.
5. Increase the number of visitors using the National Park outside the peak visitor season.			0	The policy is unlikely to prove relevant to this Sustainability Objective.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.			0	The policy is unlikely to prove relevant to this Sustainability Objective.
7. Reduce factors contributing to climate change.			+	The provision of local waste recycling and re-use facilities would assist in reducing the use of virgin material which is usually high energy and contributes to climate change.
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.			0	The provision of local waste recycling facilities may provide services to the local community, enhancing their sustainability. However, benefits are likely to be negligible.
9. Encourage access for all to the National Park, reflecting the social mix			0	The policy is unlikely to prove relevant to this Sustainability Objective.

of society.				
10. Maintain the cultural distinctiveness of communities.			0	The policy is unlikely to prove relevant to this Sustainability Objective.
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.			0	The policy is unlikely to prove relevant to this Sustainability Objective.
12. Reduce the negative impacts of waste.			++	The introduction of local waste facilities would implement this objective.
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population			0	The policy is unlikely to prove relevant to this Sustainability Objective.
14. Maintain and enhance biodiversity both within and outside designated sites			0	The policy is unlikely to prove relevant to this Sustainability Objective.
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.			0	The policy is unlikely to prove relevant to this Sustainability Objective.

Overall assessment and suggested changes		This option would not accord with national waste strategy or planning policy and guidance ¹¹ . It is therefore not appraised.	+	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.
Recommendation	Choose option 2 as the best fit to sustainable objectives.			

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¹¹ Collections Infrastructure and Markets Sector Plan, July 2012, Section 3 (q) ;Criteria for locating waste facilities’ and Technical Advice Note 21 Waste, February 2014, paragraph 3.26

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Section C: Climate Change, Sustainable Design, Sustainable Energy

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Policy 29: SUSTAINABLE DESIGN										
Option exclusivity: 1, 2, 3, 4, 5	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		Option 2: Require all new dwellings and other new buildings to achieve BREEAM/EcoHomes “Excellent” rating ¹²		Option 3: Set energy and resource standards for particular types of development ¹³		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 ¹⁴		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.	
SA Objective	Summary	Commentary	Summary	Commentary	Summary	Commentary	Summary	Commentary	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well-being.	?	This option may be too onerous for many small scale rural development schemes. Increased build costs may make many schemes economically	?	This option may be too onerous for many small scale rural development schemes. Increased build costs above building regulation requirements	+	This option would allow for more specific requirements depending on the type of development and would be less onerous than options 1 and 2, therefore	+	Would remove requirements that are in excess of national policy for smaller scale rural development whilst ensuring minimum	+	Would remove requirements that are in excess of national policy for smaller scale rural development whilst ensuring minimum standards are applied. Requiring solar

¹² These are nationally recognised, well established certification schemes facilitated by skilled assessors, providing an independent measure of the overall sustainability of a development

¹³ This approach would not require applicants to obtain independent certification of their schemes, but would place greater onus on the Authority in assessing whether sufficient provision has been made

¹⁴ This approach would not enable early progress to be achieved in raising energy standards in most development in the National Park

		unviable from the outset.		may make many schemes economically unviable from the outset.		providing more scope for economic viable development schemes.		standards are applied.		panels on all new buildings may not provide the best design solution for hot water provision depending on site context.
2. Locate developments so as to minimise the demand for travel, especially by private car	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
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	?	Resource efficient buildings, if sensitively designed, need not conflict with aesthetic, etc. values of traditional buildings and townscapes, and could contribute to their further enrichment. However the additional requirements of this option	?	Resource efficient buildings, if sensitively designed, need not conflict with aesthetic, etc. values of traditional buildings and townscapes, and could contribute to their further enrichment. However the additional requirements of this option	?	Resource efficient buildings, if sensitively designed, need not conflict with aesthetic, etc. values of traditional buildings and townscapes, and could contribute to their further enrichment.	?	Resource efficient buildings, if sensitively designed, need not conflict with aesthetic, etc. values of traditional buildings and townscapes, and could contribute to their further enrichment.	?	Resource efficient buildings, if sensitively designed, need not conflict with aesthetic, etc. values of traditional buildings and townscapes, and could contribute to their further enrichment. However requiring solar panels on all new buildings may not

		may demand more innovative and less traditional design schemes that may conflict with their surrounding context.		may demand more innovative and less traditional design schemes that may conflict with their surrounding context.						provide the best design solution for hot water provision depending on site context.
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
5. Increase the number of visitors using the National Park outside the peak visitor season.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	++	An indirect effect of climate change is the requirement for renewable energy sources, which are not socio-	++	An indirect effect of climate change is the requirement for renewable energy sources, which are not socio-	++	An indirect effect of climate change is the requirement for renewable energy sources, which are not socio-	+	An indirect effect of climate change is the requirement for renewable energy sources, which are not socio-	++	An indirect effect of climate change is the requirement for renewable energy sources, which are not socio-economically

		economically or environmentally cost free. Improved energy and other resource efficiency will reduce the need for energy and water use and promote more sustainable drainage.		economically or environmentally cost free. Improved energy and other resource efficiency will reduce the need for energy and water use and promote more sustainable drainage.		economically or environmentally cost free. Improved energy and other resource efficiency will reduce the need for energy and water use and promote more sustainable drainage.		economically or environmentally cost free. Improved energy efficiency in line with national requirements will reduce the need for energy and water use and promote more sustainable drainage.		or environmentally cost free. Improved energy and other resource efficiency will reduce the need for energy and water use and promote more sustainable drainage.
7. Reduce factors contributing to climate change.	++	Domestic energy use is a major contributor of CO ₂ . This will substantially reduce that in new buildings.	++	Would achieve greater reduction in Carbon emissions than required by legislation, to nationally recognised standards	++	Carbon emissions reductions would depend on the standards set but would not be below building regulations / WG standards and would offer scope for achieving significant improvement	+	Would achieve Carbon emissions reductions but no requirement over national baseline for most development.	++	Would achieve reduction in Carbon emissions to nationally recognised standards although the solar panel requirement may not be the most efficient design solution in some schemes.

						s.				
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	-?	Likely to result in increased cost for homes and non domestic buildings, though this may be recouped in reduced running costs.	-?	This would have cost implications which may make it more difficult for local people to take advantage of development opportunities, though these may be offset by grants and subsequent savings.	+	Would allow different standards to be set so that sustainability standards in excess of National requirements would not prevent otherwise desirable projects benefiting local communities.	0	Would make no difference to the ability of local people to develop as these standards would apply whatever the policy for the National Park	-?	This may have cost implications (though not as great as option 1 and 2), though these may be largely offset by grants and subsequent savings.
9. Encourage access for all to the National Park, reflecting the social mix of society.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
10. Maintain the cultural distinctiveness of communities.	+/-	Likely to result in increased cost for homes and non-domestic buildings, though this may be recouped in reduced	+/-	Likely to result in increased cost for homes and non-domestic buildings, though this may be recouped in reduced	+	Would allow different standards to be set so that sustainability standards in excess of National requirements would not be of detriment	+/-	Would make no difference to the ability of local people to develop as these standards would apply whatever the policy for the	+/-	Likely to result in increased cost for homes and non-domestic buildings (though not as great as option 1 and 2). This may be recouped in

		running costs.		running costs.		the cultural distinctiveness of communities.		National Park.		reduced running costs.
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.	+	More innovative design schemes may reduce demand for traditional aggregate extraction.	+	More innovative design schemes may reduce demand for traditional aggregate extraction.	+	More innovative design schemes may reduce demand for traditional aggregate extraction.	+	More innovative design schemes from current and future legislation to achieve emissions targets may reduce demand for traditional aggregate extraction.	+	More innovative design schemes may reduce demand for traditional aggregate extraction.
12. Reduce the negative impacts of waste.	++	Waste reduction and management are integral parts of the national accreditation schemes. The impacts of waste derived from the development can be controlled under more general	++	Waste reduction and management are integral parts of the national accreditation schemes.	++	Standards could be set under this option for waste reduction and management.	++	Waste reduction and management are integral parts of the national accreditation schemes.	++	Waste reduction and management are integral parts of the national accreditation schemes.

		design and amenity considerations.								
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	+/-	Likely to result in increased cost for non-domestic buildings, though this may be recouped in reduced running costs.	+/-	Likely to result in increased cost for non-domestic buildings, though this may be recouped in reduced running costs.	+	Would allow different standards to be set so that sustainability standards in excess of National requirements would not detriment community facilities.	0	Would make no difference to the development/running of community facilities as the same minimum standards would apply whatever the policy for the National Park.	0	Would make no difference to the development/running of community facilities as the same minimum standards would apply whatever the policy for the National Park. Although the requirement for solar panels for hot water may not be the most efficient design solution.
14. Maintain and enhance biodiversity both within and outside designated sites	+	Addressing the causes of climate change is likely to be of net benefit to biodiversity globally.	+	Addressing the causes of climate change is likely to be of net benefit to biodiversity globally.	+	Addressing the causes of climate change is likely to be of net benefit to biodiversity globally.	+	Addressing the causes of climate change is likely to be of net benefit to biodiversity globally, although slightly less than options	+	Addressing the causes of climate change is likely to be of net benefit to biodiversity globally, although slightly less than options 1, 2 and 3.

							1, 2 and 3.			
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	++	Would achieve greater improvement in efficiency of water and sewerage use than required by legislation, to nationally recognised standards.	++	Would achieve greater improvement in efficiency of water and sewerage use than required by legislation, to nationally recognised standards.	++	Will depend on the nature of the standards set but would not be below building regs / WG standards, and would offer scope for achieving significant improvement.	+	Would achieve more efficient use of water and sewerage but only to the lowest acceptable standards in most cases.	+	Would achieve more efficient use of water and sewerage but only to the lowest acceptable standards in most cases.
Overall assessment and suggested changes	++	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	++	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	++	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.	+	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	++	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

		<p>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.</p>		<p>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.</p>			<p>requirement for strategic sites.</p>		<p>proposals.</p>
Recommendation	Option 3 would contribute marginally more to the sustainability appraisal criteria than 1,2 or 5.								

Policy 29: SUSTAINABLE DESIGN				
Option exclusivity: 1 or 2	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. ¹⁵		Option 2r: Distribute energy awareness literature to applicants for extensions and other householder development. ¹⁶	
SA Objective	Summary	Commentary	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well-being.	+/-	Likely to result in increased cost for homes and non-domestic buildings, though this may be recouped in reduced running costs.	+	Would raise awareness of energy saving schemes that could reduce long term running costs.
2. Locate developments so as to minimise the demand for travel, especially by private car	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
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	?	Resource efficient buildings, if sensitively designed, need not conflict with aesthetic, etc. values of traditional buildings and townscapes, and could contribute to their further enrichment.	?	Would raise awareness of resource efficient buildings, if sensitively designed, need not conflict with aesthetic, etc. values of traditional buildings and townscapes, and could contribute to their further enrichment.
4. Increase the number	0	The policy is unlikely to prove relevant to this	0	The policy is unlikely to prove relevant to this

¹⁵ This would significantly increase the ability of the Authority to promote energy efficiency improvements.

¹⁶ This awareness building approach would be “softer”, but it would be unlikely to achieve as much, in the short term at least.

of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.		Sustainability Objective.		Sustainability Objective.
5. Increase the number of visitors using the National Park outside the peak visitor season.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	++	An indirect effect of climate change is the requirement for renewable energy sources, which are not socio-economically or environmentally cost free. Improved energy efficiency will reduce the need for energy. Extension of the option to cover water use and drainage would offer opportunity to impact on flood risk.	+?	This approach might promote but would not require action to improve household efficiency.
7. Reduce factors contributing to climate change.	++	Would achieve improved carbon performance than required by current legislation as it would affect the whole building not just the alteration.	+?	This approach might promote but would not require action to improve household efficiency.
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	?	In an area of high housing prices many households will not be able to meet changing housing needs by moving house, and instead may need to alter their existing property. If the improvements required to the whole property are relatively cheap and repay rapidly (e.g. loft or cavity wall insulation) this option may not make much difference to the affordability of the alteration. More expensive improvements (e.g. new heating system or solar panels) could affect the affordability of schemes and may mean the household	0	The policy is unlikely to prove relevant to this Sustainability Objective.

		cannot address the change in its housing needs. In this context implementation of this option would need to be specific in the types of improvements and the circumstances in which they might be required (and when the rest of the building would be considered of sufficient standard not to require improvements).		
9. Encourage access for all to the National Park, reflecting the social mix of society.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
10. Maintain the cultural distinctiveness of communities.	?	In an area of high housing prices many households will not be able to meet changing housing needs by moving house, and instead may need to alter their existing property. If the improvements required to the whole property are relatively cheap and repay rapidly (e.g. loft or cavity wall insulation) this option may not make much difference to the affordability of the alteration. More expensive improvements (e.g. new heating system or solar panels) could affect the affordability of schemes and may mean the household cannot address the change in its housing needs. In this context implementation of this option would need to be specific in the types of improvements and the circumstances in which they might be required (and when the rest of the building would be considered of sufficient standard not to require improvements).	0	The policy is unlikely to prove relevant to this Sustainability Objective.
11. The adverse effects of minerals exploitation in the National Park decline from the present	+	More innovative design schemes may reduce demand for traditional aggregate extraction although are unlikely to have a significant	+	Would raise awareness of more innovative design schemes that may reduce demand for traditional aggregate extraction.

level and the potential biodiversity and landscape gains of former minerals sites are realised.		impact in this case.		
12. Reduce the negative impacts of waste.	0	More innovative design schemes to achieve energy efficiency targets may reduce traditional construction waste although is unlikely to have a significant impact in this case. The impacts of waste derived from the development can be controlled under more general design and amenity considerations.	+?	Would raise awareness of more innovative design schemes to achieve energy efficiency targets and may reduce traditional construction waste.
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	?	If the improvements required to the whole facility are relatively cheap and repay rapidly (e.g. loft or cavity wall insulation) this option may have a positive influence for its ongoing operation. More expensive improvements (e.g. new heating system or solar panels) could affect the affordability of schemes and may mean the facility cannot address the improvements needed to meet the needs of the population.	+	Would raise awareness of energy saving schemes that could reduce long term running costs.
14. Maintain and enhance biodiversity both within and outside designated sites	0	Appropriate LDP policy on biodiversity will ensure that there are no unacceptable impacts.	+	This would also provide an opportunity to highlight biodiversity opportunities when carrying out improvements within existing buildings.
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	0	Unlike the options for and resource efficiency in new build this doesn't cover non-energy resource use. Should it be extended to cover water and drainage efficiency opportunities that might exist in some cases?	0	Opportunities might also usefully be taken to promote awareness of water and drainage efficiency, which are not presently reflected in the option.

<p>Overall assessment and suggested changes</p>	<p>+</p>	<p>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.</p>	<p>+</p>	<p>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.</p> <p>Would putting such literature in with energy and water bills be more effective - offer an opportunity to save, rather than spend, money.</p>
<p>Recommendation</p>	<p>Option 1 could provide the greatest sustainability gains. However, it is the current policy approach in the adopted LDP and has been found to be unworkable in planning i.e. has been making no contributions to the SA Objectives thus far and this is unlikely to change without national policy context. Providing educational literature to improve awareness of energy and water savings may prove to be a more effective approach. Recommend option 2.</p>			

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Policy 33: RENEWABLE ENERGY								
Option exclusivity: New Option or 1, 2, 3 or 4	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. ¹⁷		Option 3: Encourage small scale community based renewable energy development, but retain tight control over the location and design of larger scale development ¹⁸		Option 4: To contribute to the development of alternative energy sources through the marine environment.	
SA Objective	Summary	Commentary	Summary	Commentary	Summary	Commentary	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well-being.	+	Renewable energy schemes can contribute to farm incomes. The policy would not support proposals that have unacceptable negative impacts on the landscape, biodiversity or to community well-being.	+	Renewable energy schemes can contribute to farm incomes. The policy would not support proposals that have unacceptable negative impacts on the landscape, biodiversity or to community well-being, which may limit the potential	+ / -	Renewable energy schemes can contribute to farm incomes. The policy would not support proposals that have unacceptable negative impacts on the landscape, biodiversity or to community well-being, which may limit the potential for larger community	0	The policy is unlikely to prove relevant to this Sustainability Objective.

¹⁷ Including renewable energy as an early consideration in development proposals would ensure that the potential for appropriate renewable energy is maximised at an early stage.

¹⁸ This option would ensure that the landscape is a primary consideration in the siting of renewable energy development and is consistent with conservation and enhancement of the natural beauty, wildlife and cultural heritage of the National Park. Community based schemes would benefit from economies of scale for investment, and avoid a proliferation of proposals.

				for larger community based schemes.		based schemes.		
2. Locate developments so as to minimise the demand for travel, especially by private car	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
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	+	The requirement to consider environmental impacts of schemes and consider the impact of schemes on the Special Qualities of the National Park should protect the landscape.	+	Appropriately scaled and located renewable energy schemes need not conflict with the conservation and enhancement of landscapes, townscapes and seascapes. However there may be limited opportunities for larger scale community based schemes on this basis.	+	Appropriately scaled and located renewable energy schemes need not conflict with the conservation and enhancement of landscapes, townscapes and seascapes. However there may be limited opportunities for larger scale community based schemes on this basis.	-	Intrusive marine renewable energy developments and onshore connections could impact on the seascape and landscape.
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.

opportunities.								
5. Increase the number of visitors using the National Park outside the peak visitor season.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
7. Reduce factors contributing to climate change.	++	Renewable energy encompasses technologies to meet energy needs without contributing to climate change. The policy allows such development as so will contribute to this Sustainability Objective.	++	Appropriate community renewable energy schemes will make a significant contribution to the implementation of this objective. Where this is not possible smaller individual schemes will also contribute.	+	Appropriate community renewable energy schemes will make a significant contribution to the implementation of this objective.	++	Appropriate renewable energy schemes will make a significant contribution to the implementation of this objective.
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	+	Community renewable energy schemes could benefit communities by providing a degree of energy security and community spirit.	+	Community renewable energy schemes could benefit communities by providing a degree of energy security and community spirit.	+	Community renewable energy schemes could benefit communities by providing a degree of energy security and community spirit.	+	Off shore schemes could benefit local communities through the provision of renewable energy or annual payments.

9. Encourage access for all to the National Park, reflecting the social mix of society.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
10. Maintain the cultural distinctiveness of communities.	+	Community based schemes could help to generate community cohesion and maintain distinctiveness.	+	Community based schemes could help to generate community cohesion and maintain distinctiveness.	+	Community based schemes could help to generate community cohesion and maintain distinctiveness.	+	Off shore schemes could benefit local communities through the provision of renewable energy or annual payments.
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.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
12. Reduce the negative impacts of waste.	+	Renewable energy technology may help to reduce waste for example anaerobic digestion.	+	Renewable energy technology may help to reduce waste for example anaerobic digestion.	+	Renewable energy technology may help to reduce waste for example anaerobic digestion.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.

14. Maintain and enhance biodiversity both within and outside designated sites	+	The policy does not support proposals that would have negative impacts on biodiversity.	+ / -	Opportunities to enhance biodiversity may arise from schemes where access is restricted and disturbance minimised. There is also potential for schemes, such as hydro power to negatively impact on ecology.	+ / -	Opportunities to enhance biodiversity may arise from schemes where access is restricted and disturbance minimised. There is also potential for schemes, such as hydro power to negatively impact on ecology.	+ / -	Disturbance to marine environment may be possible with some schemes.
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	+	The policy is likely to have a positive impact on the SA objective particularly in the case of anaerobic digestion, which helps to reduce the level of slurry applied to agricultural land.	+	The policy is likely to have a positive impact on the SA objective particularly in the case of anaerobic digestion, which helps to reduce the level of slurry applied to agricultural land.	+	The policy is likely to have a positive impact on the SA objective particularly in the case of anaerobic digestion, which helps to reduce the level of slurry applied to agricultural land.	0	Disturbance to marine environment may be possible with some schemes.
Overall assessment and suggested changes	+	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	+	Whilst some renewable energy development may impact negatively on biodiversity and landscape, appropriate increased renewable energy would contribute to the reduction of	+	Whilst some renewable energy development may impact negatively on biodiversity and landscape, appropriate increased renewable energy would contribute to the reduction of	+?	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

		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.		factors contributing to climate change. The requirement to explore community based schemes in the first instance may prove unworkable.		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.
Recommendation	Option 1 contributes the most positively to the SA Objectives.							

Sustainability Appraisal of the Pembrokeshire Coast National Park Replacement Local Development Plan Preferred Strategy May 2017

Appendix B: Detailed Options Appraisal

Section D: Visitor Economy, Employment

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Policy 35a): VISITOR ECONOMY

Option exclusivity: 1 or 2	<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>Option 2: Allowing limited caravan, camping and chalet development, including site extensions and change from camping to touring and static caravan pitches, in defined locations.</p>	
SA Objective	Summary	Commentary	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well-being.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
2. Locate developments so as to minimise the demand for travel, especially by private car	0	The policy is unlikely to prove relevant to this Sustainability Objective.	-	Further caravan and camping pitches and chalet units on new or existing sites will increase use number of visitors accessing the National Park by private car.
3. Conserve and enhance landscapes, townscapes and seascapes, and all their	++	This policy option seeks to enhance the landscape by allowing upgrading of pitches, provided numbers of units are rationalised and environmental benefits result. This would	+	Policy only allows new sites where they can be assimilated into the landscape, it also only allows for extensions with clear environmental benefits.

components (including the built environment and archaeology) with reference to the special qualities of the National Park		include impact on the landscape. The option would allow for such developments only within settlements where there would be an opportunity to use design to allow the buildings be in character with surrounding buildings.		
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
5. Increase the number of visitors using the National Park outside the peak visitor season.	++	This option would allow conversion of some caravan or camping pitches to more permanent accommodation which is likely to be more appropriate for year-round use.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	-	Camping and caravanning sites are frequently green field sites. Upgrading to more permanent accommodation is likely to increase hard surfaces and therefore affect the rate of surface run-off. Without attenuation this may have an impact on flooding in some cases.	0	This would have neither a positive or negative effect on the SA objective.
7. Reduce factors contributing to climate change.	-	More permanent developments would likely require materials created through more energy intensive processes such as concrete and may result in higher operational energy costs on site.	-	New caravan and chalet sites are likely to increase car use.

8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	+	Upgrading to more permanent accommodation, particularly in settlements is likely to allow it to be used for a longer period of the year and there is therefore potential for visitors to help sustain local facilities and services for a longer period.	+	New caravan or chalet sites may create new jobs and potentially new facilities such as shops that could also be used by local people.
9. Encourage access for all to the National Park, reflecting the social mix of society.	+	May allow some of the surplus caravan and camping sites to be used for alternative visitor accommodation and therefore increase provision of self-catering accommodation.	+	Policy allows for a range of accommodation types to suit varying budgets and abilities.
10. Maintain the cultural distinctiveness of communities.	+	This option provides an opportunity to use design to create buildings that are in character with the surrounding area.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
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.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	-	Any development is likely to demand minerals, and it is not unlikely that at least some of these will originate in the National Park. Locating development within a settlement may increase the likelihood of the redevelopment of brownfield sites with the potential for the recycling of building material.
12. Reduce the negative impacts of waste.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	-	New and extended sites will create additional waste both during construction and operation.
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the	0	The policy is unlikely to prove relevant to this Sustainability Objective.	+	New sites or extensions to existing sites may provide a new community facility such as an on-site shop that could also be used by local people. Alternatively, visitors can help sustain existing community facilities.

National Park population				
14. Maintain and enhance biodiversity both within and outside designated sites	0?	Other LDP policies will help to prevent unacceptable impacts to biodiversity. May impact on biodiversity as temporary structures are replaced with permanent structures.	0	Other LDP policies will help to prevent unacceptable impacts to biodiversity.
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	-	New caravan and chalet sites are likely to have significant seasonal demands for water and sewerage.
Overall assessment and suggested changes	+	Likely to realise landscape benefits in terms of more appropriately designed and sited structures, likely to offer better opportunities for year round tourism.	+/-	The policy option provides for less protection of the landscape and is likely to increase climatic factors such as waste and energy use. However, it provides for more community and employment benefits than option 1 as a tradeoff.
Recommendation	Option 1 aligns best with the SA Objectives.			

Policy 35c): VISITOR ECONOMY												
Option exclusivity: 1, 2, 3, 4, 5 or 6	Option 1: Outside the Tenby Tourism Growth Area do not permit any further self-catering accommodation in the National Park.		Option 2: Do not permit any further self-catering accommodation in the National Park.		Option 3: Allow self-catering in conversions in the countryside and on brownfield sites in defined centres ¹⁹ .		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.		Option 5: Allow self-catering in conversions in the countryside.		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.	
SA Objective	Summary	Commentary	Summary	Commentary	Summary	Commentary	Summary	Commentary	Summary	Commentary	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well-being.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.

¹⁹ Tier1 and Tier2 Centres – see Scale and Location of Growth Section

2. Locate developments so as to minimise the demand for travel, especially by private car	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
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	+	Potential for redevelopment of brownfield sites in a limited area only.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	+	Potential for redevelopment of brownfield sites in larger settlements only.	++	Potential for redevelopment of brownfield sites.	++	Potential for redevelopment of brownfield sites.	+	Potential for redevelopment of brownfield sites.
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.

5. Increase the number of visitors using the National Park outside the peak visitor season.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	0	Appropriate flood risk and protection of biodiversity policies will ensure that sites are not located so as to contribute to these potential effects of climate change.	0	As developable land in the National Park is limited, there is every likelihood that land not used for this purpose would be developed for another purpose.	0	Appropriate flood risk and protection of biodiversity policies will ensure that sites are not located so as to contribute to these potential effects of climate change.	0	Appropriate flood risk and protection of biodiversity policies will ensure that sites are not located so as to contribute to these potential effects of climate change.	0	Appropriate flood risk and protection of biodiversity policies will ensure that sites are not located so as to contribute to these potential effects of climate change.	0	Appropriate flood risk and protection of biodiversity policies will ensure that sites are not located so as to contribute to these potential effects of climate change.
7. Reduce factors contributing to climate change.	-	Any development will result in a net increase in greenhouse gas emissions in the National Park.	- /+	This would retain the status quo.	-	Any development will result in a net increase in greenhouse gas emissions in the National Park.	-	Any development will result in a net increase in greenhouse gas emissions in the National Park.	-	Any development will result in a net increase in greenhouse gas emissions in the National Park.	-?	Any development will result in a net increase in greenhouse gas emissions in the National Park.
8. Maximise the	+	An increase	+	This retains	+/-	This policy	+	This policy	+	This policy	+	This policy

<p>contribution of the limited opportunities for development to sustaining local communities.</p>		<p>in these facilities may attract greater numbers of visitors who may contribute towards retaining locally-provided services such as village shops but for a limited area only.</p>		<p>the status quo.</p>	<p>-</p>	<p>re-uses brownfield sites but does not recognise a priority for affordable housing.</p>		<p>supports this SA Objective.</p>		<p>supports communities but to a limited extent.</p>	<p>+</p>	<p>gives maximum support to this SA Objective by recognising the greatest need for communities being affordable housing provision.</p>
<p>9. Encourage access for all to the National Park, reflecting the social mix of society.</p>	<p>+</p>	<p>Allows greater provision of self-catering accommodation but only in a limited area of the National Park.</p>	<p>0</p>	<p>There are a significant number of residential properties in the National Park used and advertised for self-catering accommodation. Some second homes are also let for holiday use on a casual basis. Planning</p>	<p>+</p>	<p>May allow greater provision of self-catering accommodation.</p>	<p>+</p>	<p>May allow greater provision of self-catering accommodation.</p>	<p>+</p>	<p>May allow greater provision of self-catering accommodation.</p>	<p>++</p>	<p>Policy may allow for a variety of accommodation to suit abilities. Policy may also allow for some affordable housing.</p>

				permission is not needed to convert a permanent residence to either a second home or a holiday letting property and so there is potential for continued expansion of this sector without new build additions.								
10. Maintain the cultural distinctiveness of communities.	+	Many houses in the National Park are now used for holiday letting. An over-supply can impact negatively on the culture of communities where houses remain empty for parts of the year. This option has a	- /+	Many houses in the National Park are now used for holiday letting. An over-supply can impact negatively on the culture of communities where houses remain empty for parts of the year. Lack of new provision may mean	- /+	This allows limited new self-catering developments through development of windfall sites which would help to enhance derelict or dilapidated buildings or sites to a limited area.	+	This allows limited new self-catering developments through development of windfall sites which would help to enhance derelict or dilapidated buildings or sites. Prioritising affordable housing, if there is a need will help	+	This allows limited new self-catering developments through development of windfall sites which would help to enhance derelict or dilapidated buildings or sites.	+	This policy directly supports this SA Objective and maximises opportunities for affordable housing.

		proactive approach to increasing provision only in the tourism growth area.		more of the existing properties are used for this purpose.				maintain sustainable 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.	-	Any development is likely to demand minerals, and it is not unlikely that at least some of these will originate in the National Park. Locating development within a settlement may increase the likelihood of the redevelopment of brownfield sites with the potential for the recycling of building material.	0	The policy is unlikely to prove relevant to this Sustainability Objective as no development is proposed.	-	Any development is likely to demand minerals, and it is not unlikely that at least some of these will originate in the National Park. Locating development within a settlement may increase the likelihood of the redevelopment of brownfield sites with the potential for the recycling of building material.	-	Any development is likely to demand minerals, and it is not unlikely that at least some of these will originate in the National Park. Locating development within a settlement may increase the likelihood of the redevelopment of brownfield sites with the potential for the recycling of building material.	-	Any development is likely to demand minerals, and it is not unlikely that at least some of these will originate in the National Park.	-	Any development is likely to demand minerals, and it is not unlikely that at least some of these will originate in the National Park. Locating development within a settlement may increase the likelihood of the redevelopment of brownfield sites with the potential for the recycling of building material.

12. Reduce the negative impacts of waste.	-	Any development will generate additional waste both during construction and after.	-		-	Any development will generate additional waste both during construction and after.	-	Any development will generate additional waste both during construction and after.	-	Any development will generate additional waste both during construction and after.	-	Any development will generate additional waste both during construction and after.
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
14. Maintain and enhance biodiversity both within and outside designated sites	0	LDP policy on biodiversity will ensure that there are no unacceptable impacts.	-/+	This maintains the status quo.	0	LDP policy on biodiversity will ensure that there are no unacceptable impacts.	0	LDP policy on biodiversity will ensure that there are no unacceptable impacts.	0	LDP policy on biodiversity will ensure that there are no unacceptable impacts.	0	LDP policy on biodiversity will ensure that there are no unacceptable impacts.
15. Promote sustainable use of, and maintain and enhance the quality of, inland and	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.

coastal waters.												
Overall assessment and suggested changes	+	Limits self-catering to a certain areas of the Park without taking into account community priorities.	-	Limits self-catering but fails to prioritise use of sites for affordable housing which is a priority to sustain communities.	+/ -	This policy would maximise opportunities for self-catering development but with no regard for affordable housing which is a priority to sustain communities.	+ +	Gives priority to affordable housing whilst allowing more self-catering provision.	0	The benefits of self-catering development communities are limited to the countryside. Affordable housing need is not considered.	+ +	Maximises opportunities for affordable housing provision whilst allowing for self-catering developments benefitting communities, the environment and economy.
Recommendation	Whilst options 4 and 6 both have strong positive benefits, option 6 maximises the potential to deliver what is required to sustain communities and make improvements in the environment.											

Policy 35d): VISITOR ECONOMY						
Option exclusivity: 1, 2 or 3	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.	
SA Objective	Summary	Commentary	Summary	Commentary	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well-being.	+	Policy criteria may provide opportunities to enhance the agriculture and forestry sectors.	+	Policy criteria may provide opportunities to enhance the agriculture and forestry sectors.	+	Policy criteria may provide opportunities to enhance the agriculture and forestry sectors.
2. Locate developments so as to minimise the demand for travel,	++	This option allows attractions in the most accessible locations, with a need to demonstrate a reason to be elsewhere.	+	This option allows attractions in a greater number of settlements but has reduced accessibility requirements compared to option	+/-	The policy aims to direct attractions to accessible locations. However, the policy does not have a sequential

especially by private car				1.		approach and does not restrict proposals in less accessible locations.
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	++	This option encourages attractions in the largest settlements with a need to demonstrate a reason to be elsewhere. These are the settlements most likely to be able to absorb such developments.	+	This option encourages attractions in a greater number of settlements with a need to demonstrate a reason to be in the countryside. Appropriate LDP policies will ensure that no unacceptable impacts occur.	0	Appropriate LDP policies will ensure that no unacceptable impacts occur.
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	++	Encouraging attractions in the largest settlements will encourage multi-purpose trips or walking and cycling directly from accommodation.	0+?	Potential for positive effect dependent on the nature of the types of attraction.	0+?	Potential for positive effect dependent on the nature of the types of attraction.
5. Increase the number of visitors using the National Park outside the peak visitor season.	0	Potential for positive effect dependent on the nature of the types of attraction and if they are open year round.	0	Potential for positive effect dependent on the nature of the types of attraction and if they are open year round.	0+?	Potential for positive effect dependent on the nature of the types of attraction and if they are open year round.
6. Manage the effects of climate change with particular	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.

reference to the risk of flooding; the effect on biodiversity; public health.						
7. Reduce factors contributing to climate change.	+/-	Attractions within settlements are likely to reduce the need to travel by private car. However, construction and operation of additional tourist attractions will increase net greenhouse gas emissions in the National Park.	+/-	Attractions within settlements are likely to reduce the need to travel by private car, although this option fails to distinguish between the accessibility of various settlements. However, construction and operation of additional tourist attractions will increase net greenhouse gas emissions in the National Park.	+/-	Attractions within and adjacent to settlements are likely to reduce the need to travel by private car. However, construction and operation of additional tourist attractions will increase net greenhouse gas emissions in the National Park.
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	+	Policy allows for the development of attractions, which may help to sustain employment opportunities.	+	Policy allows for the development of attractions, which may help to sustain employment opportunities.	+	Policy allows for the development of attractions, which may help to sustain employment opportunities.
9. Encourage access for all to the National Park, reflecting the social mix of society.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
10. Maintain the cultural distinctiveness of communities.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
11. The adverse effects of minerals exploitation in the	-	Any development is likely to demand minerals, and it is not unlikely that at least some of	-	Any development is likely to demand minerals, and it is not unlikely that at least some of	-	Any development is likely to demand minerals, and it is not unlikely that at least some of

National Park decline from the present level and the potential biodiversity and landscape gains of former minerals sites are realised.		these will originate in the National Park. Locating development within a settlement may increase the likelihood of the redevelopment of brownfield sites with the potential for the recycling of building material.		these will originate in the National Park. Locating development within a settlement may increase the likelihood of the redevelopment of brownfield sites with the potential for the recycling of building material.		these will originate in the National Park. Locating development within a settlement may increase the likelihood of the redevelopment of brownfield sites with the potential for the recycling of building material.
12. Reduce the negative impacts of waste.	-	New tourist attractions will create additional waste both during construction and operation.	-	New tourist attractions will create additional waste both during construction and operation.	-	New tourist attractions will create additional waste both during construction and operation.
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective
14. Maintain and enhance biodiversity both within and outside designated sites	0	Appropriate protection of biodiversity policies will ensure that sites are located to minimise the impacts on biodiversity.	0	Appropriate protection of biodiversity policies will ensure that sites are located to minimise the impacts on biodiversity.	0	Appropriate protection of biodiversity policies will ensure that sites are located to minimise the impacts on biodiversity.
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	0	Appropriate LDP policies will ensure that there are no unacceptable impacts to water courses.	0	Appropriate LDP policies will ensure that there are no unacceptable impacts to water courses.	0	Appropriate LDP policies will ensure that there are no unacceptable impacts to water courses.

Overall assessment and suggested changes	++	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.	+?	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.	-	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.
Recommendation	The Sustainability Appraisal finds option 1 to be most sustainable.					

DRAFT

Policy 36: Hotels and Guest Houses										
Option exclusivity: 1, 2, 3, 4 or 5.	Option 1: Protect against loss of all hotels and guest houses		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 3: Protect against the loss of hotels and guesthouses in the Tenby Tourism Growth area.		Option 4: Allow conversion of hotels and guesthouses. ²⁰		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.	
SA Objective	Summary	Commentary	Summary	Commentary	Summary	Commentary	Summary	Commentary	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well-being.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	+	May provide opportunities for the rural economy.
2. Locate developments so as to minimise the demand for	0	The policy is unlikely to prove relevant to this	0	The policy is unlikely to prove relevant to this Sustainability	0	The policy is unlikely to prove relevant to this	0	The policy is unlikely to prove relevant to this Sustainability	-	Policy is unlikely to minimise the need to travel overall. New hotels and guest

²⁰ This approach would allow the market to dictate the supply of serviced accommodation provision. With house prices being so high there is a risk that even hotels with a viable future would be lost to housing use. This would have wider implications for resorts and even smaller settlements in the National Park.

travel, especially by private car		Sustainability Objective.		Objective.		Sustainability Objective.		Objective.		houses in rural locations may increase the need to travel 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	-/+	Hotels and guest houses contribute an important element to the townscape in some instances, particularly in the resorts of Tenby and Saundersfoot . This policy option helps to conserve the townscape provided that the buildings are retained. There is a danger, however of damage to the townscape where the use is no longer viable and the buildings	++	Hotels and guest houses contribute an important element to the townscape in some instances, particularly in the resorts of Tenby and Saundersfoot. This policy option helps to conserve the townscape provided that the buildings are retained. Those with an unviable future would be redeveloped or reused thus also protecting the townscape.	-/+	Hotels and guest houses contribute an important element to the townscape in some instances, particularly in the resorts of Tenby and Saundersfoot . This policy option helps to conserve the townscape provided that the buildings are retained. There is a danger, however of damage to the townscape where the use is no longer viable and the buildings	-	Hotels and guest houses contribute an important element to the townscape in some instances, particularly in the resorts of Tenby and Saundersfoot. Loss of facilities may negatively impact on townscapes in some instances.	++	Other LDP policy on design will prevent unacceptable impacts of new hotels on the townscape, ensuring that they are sympathetically designed and well located. There may also be opportunities to convert existing buildings within Centres and prevent dereliction. Hotels and guest houses contribute an important element to the townscape in some instances, particularly in the resorts of Tenby and

		become dilapidated as a result.				become dilapidated as a result. Outside the Tenby Tourism Growth Area the loss of serviced accommodation premises could negatively impact on townscapes.				Saundersfoot. This policy helps to conserve the townscape provided that the buildings are retained. Those with an unviable future would be redeveloped or reused thus also protecting the townscape.
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
5. Increase the number of visitors using the National Park outside the peak visitor season.	+	Good quality serviced accommodation is acknowledged to be best placed to provide for year-round	++	Good quality serviced accommodation is acknowledged to be best placed to provide for year-round	+	This option protects against loss of serviced accommodation only in a limited area of the National Park	-	It is likely that some proposals arising from the conversion of hotels and guest houses would be for other visitor	++	Good quality serviced accommodation is acknowledged to be best placed to provide for year-round visitor accommodation.

		visitor accommodation. This option protects all serviced accommodation and therefore has the potential to assist with this criterion. It does not, however, discriminate in terms of quality.		visitor accommodation. This option protects all serviced accommodation and therefore has the potential to assist with this criterion. Unlike the previous option this one protects serviced accommodation with a viable future which is more likely to be of a good quality.		and therefore the effects of such an approach would also be limited. This option does not discriminate in terms of quality.		accommodation, such as self-catering properties. This would be only a proportion, however and therefore there would be greater potential to lose visitor accommodation to uses such as residential.		This option protects all serviced accommodation and therefore has the potential to assist with this criterion.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	Other LDP policy will ensure that there are no adverse impacts.
7. Reduce factors contributing to climate change.	0	The policy is unlikely to prove relevant to this	0	The policy is unlikely to prove relevant to this Sustainability	0	The policy is unlikely to prove relevant to this	0	The policy is unlikely to prove relevant to this Sustainability	-	Any new development is likely to increase energy usage and create

		Sustainability Objective.		Objective.		Sustainability Objective.		Objective.		additional waste on site. Also see objective 2.
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	++	Serviced accommodation not only provides direct employment opportunities but also is important beyond the parameters of the serviced accommodation trade itself. There is also the aspect of other facilities often provided by serviced accommodation premises such as a public house or restaurant and in some cases fitness or leisure facilities.	++	Serviced accommodation not only provides direct employment opportunities but also is important beyond the parameters of the serviced accommodation trade itself. There is also the aspect of other facilities often provided by serviced accommodation premises such as a public house or restaurant and in some cases fitness or leisure facilities.	+	Serviced accommodation not only provides direct employment opportunities but also is important beyond the parameters of the serviced accommodation trade itself. There is also the aspect of other facilities often provided by serviced accommodation premises such as a public house or restaurant and in some cases fitness or leisure facilities. This would apply only in a limited area	-	Serviced accommodation not only provides direct employment opportunities but also is important beyond the parameters of the serviced accommodation trade itself. There is also the aspect of other facilities often provided by serviced accommodation premises such as a public house or restaurant and in some cases fitness or leisure facilities. Losses of these facilities and employment opportunities may result through this	++	Serviced accommodation not only provides direct employment opportunities but can also provide other facilities important to communities such as pubs or leisure and fitness facilities.

					of the National Park.		policy option.			
9. Encourage access for all to the National Park, reflecting the social mix of society.	+	Has the potential to ensure accommodation is provided for a range of budgets.	+	Has the potential to ensure accommodation is provided for a range of budgets.	+	Has the potential to ensure accommodation is provided for a range of budgets within a limited area.	?	May provide for less choice in serviced accommodation.	+?	Has the potential to ensure accommodation is provided for a range of budgets and abilities.
10. Maintain the cultural distinctiveness of communities.	++	Hotels and guest houses contribute an important element to the culture of some communities in the National Park, particularly in the resorts of Tenby and Saundersfoot . This policy option helps to conserve that culture.	++	Hotels and guest houses contribute an important element to the culture of some communities in the National Park, particularly in the resorts of Tenby and Saundersfoot. This policy option helps to conserve that culture.	++	Hotels and guest houses contribute an important element to the culture of some communities in the National Park, particularly in the resorts of Tenby and Saundersfoot . This policy option helps to conserve that culture within the most affected area.	-	Loss of serviced accommodation could have a negative impact on the cultural distinctiveness of some communities, particularly the resorts of Tenby and Saundersfoot.	++	Hotels and guest houses contribute an important element to the culture of some communities in the National Park, particularly in the resorts of Tenby and Saundersfoot. This policy helps to conserve that culture.

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.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	-	Any development is likely to demand minerals, and it is not unlikely that at least some of these will originate in the National Park. Locating development within a settlement may increase the likelihood of the redevelopment of brownfield sites with the potential for the recycling of building material.
12. Reduce the negative impacts of waste.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	-	Waste will be generated as a result of the development of new hotels.
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	+	Hotels often provide community facilities such as leisure facilities and pubs/restaurants .

meet the needs of the National Park population										
14. Maintain and enhance biodiversity both within and outside designated sites	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	Other LDP policies will help to prevent unacceptable impacts to biodiversity.
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
Overall assessment and suggested changes	+	Whilst this option is generally compatible with the SA Objectives in its aims it could ultimately result in the loss of serviced accommodation.	+	Option least likely to result in the loss of serviced accommodation, with attendant negative effects.	-	More likely to result in loss of serviced accommodation, with more attendant effects than option 2.	--	Could result in extensive loss of serviced accommodation with negative effects on settlement character and employment.	+	Policy performs well against the relevant SA Objectives, no changes suggested.
Recommendation	Option 5 performs well and provides a context for consideration of provision of new serviced accommodation as well as protecting existing accommodation.									

Policy 42b: EMPLOYMENT PROPOSALS						
Option exclusivity: 1, 2 or 3.	Option 1: Direct small-scale employment proposals to appropriate locations within or adjacent to Centres or buildings suitable for conversion in the countryside.		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.		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.	
SA Objective	Sum - mary	Commentary	Sum - mary	Commentary	Sum - mary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well-being.	+	The policy will allow for employment proposals linked to these sectors balanced by terms of scale to help minimise impact on the landscape, biodiversity and community well-being.	-	The policy will allow for employment proposals linked to these sectors but at a larger scale which will have greater impact on the landscape, biodiversity and community well-being.	--	The policy will allow for employment proposals linked to these sectors but with little restraint on scale which could potentially impact significantly on the landscape, biodiversity and community well-being.
2. Locate developments so as to minimise the demand for travel, especially by private car	+	Location of employment uses in the main settlements allows for maximum accessibility by means other than private car. This would be offset to some extent by allowing conversion of buildings in remote locations to be used for employment uses.	-	Allowing larger scale proposals is likely to attract larger numbers of people travelling to or from the site in terms of users, suppliers etc. This option is therefore less sustainable than option 1.	--	With little restraint on scale there potential for large-scale proposals which would attract larger numbers of people travelling to the site.
3. Conserve and enhance landscapes, townscapes and seascapes, and all	+	The scale of proposals in this option will help to minimise the impact of development on	-	The scale of proposals in this option gives potential for larger developments which would have greater	--	This proposal allows for large-scale developments which would have even greater potential to adversely impact landscapes, townscapes and

their components (including the built environment and archaeology) with reference to the special qualities of the National Park		landscapes, townscapes and seascapes.		impact on landscapes, townscapes and seascapes.		seascapes.
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
5. Increase the number of visitors using the National Park outside the peak visitor season.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	0	Appropriate flood risk and protection of biodiversity policies will ensure that sites are not located so as to contribute to these potential effects of climate change.	0	Appropriate flood risk and protection of biodiversity policies will ensure that sites are not located so as to contribute to these potential effects of climate change.	0	Appropriate flood risk and protection of biodiversity policies will ensure that sites are not located so as to contribute to these potential effects of climate change.
7. Reduce factors contributing to climate change.	+	See objective 2.	-	See objective 2	--	See objective 2.
8. Maximise the contribution of the limited opportunities for development to sustaining local	+	This policy option directs business developments to existing settlements thereby providing	+	This policy option directs business developments to existing settlements thereby providing employment	+	This policy option directs business developments to existing settlements thereby providing employment opportunities.

communities.		employment opportunities.		opportunities.		
9. Encourage access for all to the National Park, reflecting the social mix of society.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
10. Maintain the cultural distinctiveness of communities.	++	This option matches the scale of development to the size of the settlement thus maximising the likelihood of maintaining the cultural distinctiveness of communities.	-	This option allows larger scale developments which may adversely impact on the distinctiveness of communities.	--	This option would potentially allow large developments which could over-dominate and damage the 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.	-	Any development is likely to demand minerals, and it is not unlikely that at least some of these will originate in the National Park. In this option the scale of development is limited.	--	Any development is likely to demand minerals, and it is not unlikely that at least some of these will originate in the National Park. In this option the scale of development is greater.	--	Any development is likely to demand minerals, and it is not unlikely that at least some of these will originate in the National Park. In this option the scale of development is greater still.
12. Reduce the negative impacts of waste.	-	Likely to lead to more waste generation.	--	Likely to lead to even more waste generation.	--	Likely to lead to more waste generation still.
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.

14. Maintain and enhance biodiversity both within and outside designated sites	0	Appropriate protection of biodiversity policies will ensure that sites are not located to minimise the impacts on biodiversity.	0	Appropriate protection of biodiversity policies will ensure that sites are not located to minimise the impacts on biodiversity.	0	Appropriate protection of biodiversity policies will ensure that sites are not located to minimise the impacts on biodiversity.
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
Overall assessment and suggested changes	+	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.	-	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.	--	See appraisal for option 2, same effects but to a greater degree due to a further increase in the scale of development.
Recommendation	Option 1 is the most sustainable option.					

Sustainability Appraisal of the Pembrokeshire Coast National Park Replacement Local Development Plan Preferred Strategy May 2017

Appendix B: Detailed Options Appraisal

Section E: Affordable Housing and Housing

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Policies 44 and 45: Housing and Affordable Housing								
Option exclusivity: 1,2, 3 or 4	Option 1: A policy based on the latest Welsh Government National Park Household Projections.		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: <ul style="list-style-type: none"> ▪ distribution of housing development in accordance of with the Plan's spatial strategy ▪ the deliverability of sites ▪ the National Park's landscape capacity to absorb additional housing development 		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. ²¹		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. ²²	
SA Objective	Sum-mary	Commentar y	Sum-mary	Commentar y	Summary	Commentar y	Summary	Commentar y
1. Economically viable agriculture and forestry sectors that are	++/--	See across but impacts would be more	+/-	See across	+/-	May mean the loss of agricultural land or	+/-	See across.

²¹ If a greater supply of land for housing cannot be found then the target for provision will not be achieved. Developers may seek to hold land in hope of a less onerous affordable housing requirement in the future. The Authority seeks to achieve to meet its affordable housing requirements locally. Sites developed solely for affordable housing would integrate better with local communities if smaller in size.

²² Developers are becoming familiar with this approach. It is unlikely to achieve the affordable housing needs of the National Park. A settlement is defined in the Joint Unitary Development Plan as 'a group of houses which form a village or hamlet where there is a physical cohesion of dwellings'

contributing to conserving and enhancing landscape, biodiversity and community well-being.		extreme.				financial support for the farming community.		
2. Locate developments so as to minimise the demand for travel, especially by private car	-	With affordable housing only development national policy allows such proposals in locations not accessible by private car.	++	Unlocks land so local people can live locally and need to travel less.	++	Unlocks land so local people can live locally and need to travel less.	+	See across but to a lesser extent as less being negotiated.
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	+/-	More limited development opportunities may mean less impact. Opportunities for regeneration and conversion are less likely to be viable however.	+	Other policies and appraisal processes will help to ensure that development is sympathetic to the character of the local area.	+	Other policies and appraisal processes will help to ensure that development is sympathetic to the character of the local area.	+	Other policies and appraisal processes will help to ensure that development is sympathetic to the character of the local area
4. Increase the number of residents and	0	The policy is unlikely to prove	0	The policy is unlikely to prove	0	The policy is unlikely to prove	0	The policy is unlikely to prove

visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.		relevant to this Sustainability Objective		relevant to this Sustainability Objective		relevant to this Sustainability Objective.		relevant to this Sustainability Objective.
5. Increase the number of visitors using the National Park outside the peak visitor season.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	-	Given that affordable housing may be located in inaccessible locations a negative impact is possible here.	-	Whilst there may be opportunities to reduce the need to travel (see objective 2) development is likely to increase the proportion of hard standing and increase surface water run-off. Mitigation may be achieved through the use of sustainable	-	Whilst there may be opportunities to reduce the need to travel (see objective 2) development is likely to increase the proportion of hard standing and increase surface water run-off. Mitigation may be achieved through the use of sustainable	-	Whilst there may be opportunities to reduce the need to travel (see objective 2) development is likely to increase the proportion of hard standing and increase surface water run-off. Mitigation may be achieved through the use of sustainable

				drainage systems.		drainage systems.		drainage systems.
7. Reduce factors contributing to climate change.	-	Given that affordable housing may be located in inaccessible locations a negative impact is possible here.	-	Whilst there may be opportunities to reduce the need to travel (see objective 2) a net increase in carbon emissions from the increase in households is inevitable	-	Whilst there may be opportunities to reduce the need to travel (see objective 2) a net increase in carbon emissions from the increase in households is inevitable.	-	Whilst there may be opportunities to reduce the need to travel (see objective 2) a net increase in carbon emissions from the increase in households is inevitable.
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	+	Directly related to this objective. However how much affordable housing can be achieved using only an exceptional land release approach?	++	Directly related to this objective. This option provides for more affordable housing than option 3 but stipulates more caveats than option 4.	++	Directly related to this objective. This option provides for the most affordable housing.	+	Directly related to this objective but less effective than the second and third options.
9. Encourage access for all to the National Park,	+	Directly related to this	++	Directly related to this	++	Directly related to this	+	Directly related to this objective

reflecting the social mix of society.		objective. However how much affordable housing can be achieved using only an exceptional land release approach?		objective. This option provides for more affordable housing than option 3 but stipulates more caveats than option 4.		objective. This option provides for the most affordable housing.		but less effective than the first and third options.
10. Maintain the cultural distinctiveness of communities.	+	Ensuring local people can live locally should help to maintain the cultural distinctiveness of communities in the National Park. However how much affordable housing can be achieved using only an exceptional land release approach?	++	Ensuring local people can live locally should help to maintain the cultural distinctiveness of communities in the National Park.	++	Ensuring local people can live locally should help to maintain the cultural distinctiveness of communities in the National Park.	+	As across but to a lesser extent.
11. The adverse effects of minerals exploitation in the	-	Any development is likely to	-	Any development is likely to	-	Any development is likely to	-	Any development is likely to

National Park decline from the present level and the potential biodiversity and landscape gains of former minerals sites are realised.		demand minerals, and it is not unlikely that at least some of these will originate in the National Park.		demand minerals, and it is not unlikely that at least some of these will originate in the National Park.		demand minerals, and it is not unlikely that at least some of these will originate in the National Park.		demand minerals, and it is not unlikely that at least some of these will originate in the National Park.
12. Reduce the negative impacts of waste.	-	Likely to lead to more waste generation (also see objective 7).	-	Likely to lead to more waste generation (also see objective 7).	-	Likely to lead to more waste generation (also see objective 7).	-	Likely to lead to more waste generation (also see objective 7).
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	+/-	Affordable housing provision can help support community facilities but may mean fewer contributions for other community facilities. This is more likely with just exceptional land releases for affordable housing.	+/-	Affordable housing provision can help support community facilities but may mean fewer contributions for other community facilities.	+/-	Affordable housing provision can help support community facilities but may mean fewer contributions for other community facilities.	+/-	Affordable housing provision can help support community facilities but may mean fewer contributions for other community facilities (to a lesser extent).

14. Maintain and enhance biodiversity both within and outside designated sites	+	Sites for housing development are subject to a rigorous selection process to ensure that there are no unacceptable impacts to biodiversity.	+	Sites for housing development are subject to a rigorous selection process to ensure that there are no unacceptable impacts to biodiversity.	+	Sites for housing development are subject to a rigorous selection process to ensure that there are no unacceptable impacts to biodiversity.	+	Sites for housing development are subject to a rigorous selection process to ensure that there are no unacceptable impacts to biodiversity.
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	+	Sites for housing development are subject to a rigorous selection process to ensure that there are no unacceptable impacts.	+	Sites for housing development are subject to a rigorous selection process to ensure that there are no unacceptable impacts.	+	Sites for housing development are subject to a rigorous selection process to ensure that there are no unacceptable impacts.	+	Sites for housing development are subject to a rigorous selection process to ensure that there are no unacceptable impacts.

<p>Overall assessment and suggested changes</p>	<p>-</p>	<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 sites.</p> <p>The option also relies entirely on National Policy,</p>	<p>++</p>	<p>As option 3 but is likely to provide for less affordable housing due greater emphasis on deliverability.</p>	<p>++</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.</p>	<p>+</p>	<p>As option 3 but to a lesser degree as this policy allows for less affordable housing.</p>
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		<p>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>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>		
Recommendation	Option 2 contributes most in terms of the sustainability objectives because it focuses on delivery.						

Policy : 47 ONE PLANET/LOW IMPACT		
Option exclusivity: 1 or 2:	<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>2: One Planet Development will be permitted where:</p> <ul style="list-style-type: none"> a) the proposal will make a positive social and/or economic contribution with public benefit; 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.

SA Objective	Summary	Commentary	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well-being.	+	One Planet developments are generally related to agriculture or forestry, and are for developments that make a positive social or economic benefit. The effect on this SA Objective is likely to be positive.	+	One Planet developments are generally related to agriculture or forestry, and are for developments that make a positive social or economic benefit. The effect on this SA Objective is likely to be positive.
2. Locate developments so as to minimise the demand for travel, especially by private car	+	A travel plan which shows this objective being met is fundamental to any proposal considered.	+	A travel plan which shows this objective being met is fundamental to any proposal considered.
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	+	One Planet Developments are only permitted if they are well integrated into the landscape.	+	One Planet Developments are only permitted if they are well integrated into the landscape.
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	+	One Planet Developments can be education and/or recreation related and may help to progress this SA Objective.	+	One Planet Developments can be education and/or recreation related and may help to progress this SA Objective.
5. Increase the number of visitors using the	0	There is potential for One Planet Developments to provide facilities for the public that are not	0	There is potential for One Planet Developments to provide facilities for the public that are not seasonally

National Park outside the peak visitor season.		seasonally restricted. However, the effect is likely to be very minor.		restricted. However, the effect is likely to be very minor.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	+	Policy is about development related to sustainable agriculture or forestry which seeks to contribute to the government's sustainable development agenda.	+	Policy is about development related to sustainable agriculture or forestry which seeks to contribute to the government's sustainable development agenda.
7. Reduce factors contributing to climate change.	+	Policy is about development related to sustainable agriculture or forestry which seeks to contribute to the government's sustainable development agenda.	+	Policy is about development related to sustainable agriculture or forestry which seeks to contribute to the government's sustainable development agenda.
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	+	Policy is about development related to sustainable agriculture or forestry which seeks to contribute to the government's sustainable development agenda. Part of that would include a wider community contribution.	+	Policy is about development related to sustainable agriculture or forestry which seeks to contribute to the government's sustainable development agenda. Part of that would include a wider community contribution
9. Encourage access for all to the National Park, reflecting the social mix of society.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
10. Maintain the cultural distinctiveness of communities.	+/-	Such proposals can engender a range of views in local communities some related to adverse impacts to local distinctiveness. On the other hand the assessment of the proposal looks to the socio-economic contributions that these developments can make with an overall gain to be achieved. Benefits can include skills training, provision of local facilities, the provision of services, education or public access.	+/-	Such proposals can engender a range of views in local communities some related to adverse impacts to local distinctiveness. On the other hand the assessment of the proposal looks to the socio-economic contributions that these developments can make with an overall gain to be achieved. Benefits can include skills training, provision of local facilities, the provision of services, education or public access.
11. The adverse effects of minerals exploitation in the National Park	+	The policy specifically requires low impact in terms of using resources The proposal must ensure buildings are constructed from materials that are	+	The policy specifically requires low impact in terms of using resources The proposal must ensure buildings are constructed from materials that are recycled,

decline from the present level and the potential biodiversity and landscape gains of former minerals sites are realised.		recycled, reusable and have low embodied energy or are from sustainable sources. The aim is to take the proposal as far as possible in terms of its environmental performance.		reusable and have low embodied energy or are from sustainable sources. The aim is to take the proposal as far as possible in terms of its environmental performance.
12. Reduce the negative impacts of waste.	+	The project must plan to minimise the creation of waste and to reuse and recycle where possible.	+	The project must plan to minimise the creation of waste and to reuse and recycle where possible.
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	+?	The assessment of the proposal looks to the socio-economic contributions that the proposal can make with an overall gain to be achieved. Benefits can include skills training, provision of local facilities, the provision of services, education or public access.	+?	The assessment of the proposal looks to the socio-economic contributions that the proposal can make with an overall gain to be achieved. Benefits can include skills training, provision of local facilities, the provision of services, education or public access.
14. Maintain and enhance biodiversity both within and outside designated sites	+	A positive contribution or net gain is required in terms of how biodiversity is protected and enhanced on site.	+	A positive contribution or net gain is required in terms of how biodiversity is protected and enhanced on site.
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	+	No mains resource use is allowed. Waste minimisation is also required. A positive gain in terms of the environment is required.	+	No mains resource use is allowed. Waste minimisation is also required. A positive gain in terms of the environment is required.
Overall assessment and suggested changes	+	Appropriate low impact developments will be inherently sustainable and yield biodiversity and landscape benefits	+	Appropriate low impact developments will be inherently sustainable and yield biodiversity and landscape benefits
Recommendation	Both options perform equally in sustainability appraisal terms. The second option would fit with national policy advice which asks that national planning policy is not repeated in Local Development Plans.			

Sustainability Appraisal of the Pembrokeshire Coast National Park Replacement Local Development Plan Preferred Strategy May 2017

Appendix B: Detailed Options Appraisal

Section F: Community Facilities, Retailing, Transport

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Policy 48: COMMUNITY FACILITIES & INFRASTRUCTURE REQUIREMENTS

Option exclusivity: 1 or 2

Option 1: The provision and protection of community facilities will be achieved as follows:

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.

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).

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.

Option 2: As per option 1 but seek to prioritise benefits to contribute to dealing with the most acute areas of need for National Park communities. When considering the viability of housing proposals affordable housing will be given priority in further negotiations provided that it can be demonstrated that the proposal would not unduly overburden existing community infrastructure.

SA Objective	Summary	Commentary	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
2. Locate developments so as to minimise the demand for travel, especially by private car.	++	The policy seeks to place community services where they are convenient for the users. The policy should help to reduce private car use and/or reduce the journeys associated with accessing community facilities.	++	The policy seeks to place community services where they are convenient for the users. The policy should help to reduce private car use and/or reduce the journeys associated with accessing community facilities.
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	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	+	Overall the effect of the policy on this SA Objective is likely to be positive. The Policy primarily aims to protect and enhance community facilities and infrastructure and many community facilities are used for physical recreation and may be used by residents or visitors.	+	Overall the effect of the policy on this SA Objective is likely to be positive the Policy primarily aims to protect and enhance community facilities and infrastructure and many community facilities are used for physical recreation and may be used by residents or visitors.
5. Increase the number of visitors using the National Park outside the peak visitor season.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.

6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
7. Reduce factors contributing to climate change.	+	See objective 2, benefits to this objective as a result of reduced car journeys.	+	See objective 2, benefits to this objective as a result of reduced car journeys.
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	++	The effect of this policy on the SA Objective will be very positive as its purpose is to ensure that community facilities are maintained and enhanced or replaced. The policy also ensures that need arising from new development is addressed.	++	The effect of this policy on the SA Objective will be very positive as its purpose is to ensure that community facilities are maintained and enhanced or replaced. The policy also ensures that need arising from new development is addressed.
9. Encourage access for all to the National Park, reflecting the social mix of society.	++	The policy aims to provide, maintain and enhance community facilities and ensure that they are located in accessible places. The effect on this SA objective is likely to be very positive both due to accessibility and the nature of community facilities, which generally encourage participation across a broad social spectrum.	++	The policy aims to provide, maintain and enhance community facilities and ensure that they are located in accessible places. The effect on this SA objective is likely to be very positive both due to accessibility and the nature of community facilities, which generally encourage participation across a broad social spectrum.
10. Maintain the cultural distinctiveness of communities.	++	The effect of the policy on this SA Objective is likely to be very positive as it aims to meet the cultural needs of local communities, of which community facilities are integral.	++	The effect of the policy on this SA Objective is likely to be very positive as it aims to meet the cultural needs of local communities, of which community facilities are integral.

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.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
12. Reduce the negative impacts of waste.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	++	Policy aims to fulfil the aspirations of this SA Objective.	++	Policy aims to fulfil the aspirations of this SA Objective.
14. Maintain and enhance biodiversity both within and outside designated sites	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.

<p>Overall assessment and suggested changes</p>	<p>++</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>++</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>Recommendation</p>	<p>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>			

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Policy 49: RETAIL IN THE NATIONAL PARK				
Option exclusivity: 1 or 2		Option 1: To draw extensive centre boundaries ²³		Option 2: To draw restricted town and district centre boundaries ²⁴
SA Objective	Summary	Commentary	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
2. Locate developments so as to minimise the demand for travel, especially by private car	?	Retail opportunities which are not part of a compact centre can encourage separate journeys, often by car. Conversely more dispersed distribution of goods and services may encourage walking further distances for those who are able to do so.	+	Compact retail centres are likely to encourage walking from one area to another within each Centre, rather than travelling by 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	--	Could result in the change in character of residential or tourist accommodation areas in and around town centres. Might also result in the change in character, or even voids, in the existing commercial streets.	++	Would maintain the existing character of town centres.

²³ Ministerial Interim Planning Policy Statement 02/2005 states that 'need' for development is not a consideration within centres. Extensive centres allow the potential for new development away from existing commercial streets. These can compete with and harm the commercial core of towns rather than compliment them.

²⁴ This replicates the traditional approach to boundaries which closely defines the extent of the existing and allocated retail development. This approach enables the Authority to fully assess the impact of proposals which lie outside the boundary, and supports the potential for investment within the commercial core of the centre rather than outside it.

Park				
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	?	Retail opportunities which are not part of a compact centre can encourage separate journeys, often by car. Conversely more dispersed distribution of goods and services may encourage walking further distances for those who are able to do so.	+	Compact retail centres are likely to encourage walking from one area to another within each Centre, rather than travelling by car.
5. Increase the number of visitors using the National Park outside the peak visitor season.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
7. Reduce factors contributing to climate change.	?	Retail opportunities which are not part of a compact centre can encourage separate journeys, often by car.	+	Compact retail centres are likely to encourage walking from one area to another within each Centre, rather than travelling by car.
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	-	Extensive centre boundaries may undermine the core vibrancy of retail centres, altering their functional role as popular public spaces and their overall character.	+	Would help to maintain the existing character and functional role of retail centres.
9. Encourage access for all to the National Park, reflecting the social mix of society.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
10. Maintain the cultural	-	Extensive centre boundaries may undermine	+	

distinctiveness of communities.		the core vibrancy of retail centres, altering their functional role as popular public spaces and their distinct characters.		Would help to maintain the existing distinct characters and functional role of retail centres.
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.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
12. Reduce the negative impacts of waste.	-?	May result in an increase in commercial waste with more relaxed spatial distribution..	0	The policy is unlikely to prove relevant to this Sustainability Objective.
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	-	Large centres can allow stores to be developed which could undermine the expenditure available to the commercial core of the existing centres and adversely affect retail provision.	+	Compact centres, will require that a sequential approach is taken to new store development, where the available expenditure is a consideration in whether there is a need for any new retail development, This approach protects centres and the community retail uses within them.
14. Maintain and enhance biodiversity both within and outside designated sites	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.

Overall assessment and suggested changes	--	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.	+	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.
Recommendation	Option 2 is more likely to achieve sustainability objectives.			

DRAFT

Two previous policy options have been removed from the table below. These referred to permitting commercial uses to locate anywhere within smaller Centres and not permitting A3 uses that would cause unacceptable amenity impacts. These have been removed as they are not considered to be mutually exclusive and are included within the overall retail planning policy approach.

Policy 49: RETAIL IN THE NATIONAL PARK						
Option exclusivity: 1 or 2 or 3	Option 1: Retain a primary retail frontage within Tenby town centre. ²⁵		Option 2: Remove primary retail frontages from Tenby town centre ²⁶		Option 3: Introduce primary retail frontages with identified centres of the National Park. ²⁷	
SA Objective	Summary	Commentary	Summary	Commentary	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.

²⁵ This would ensure that non retailing uses cannot further dominate primary shopping areas. It would assist the town centre in retaining sufficient shopping units to be attractive to shoppers as well as allowing a broad diversity of uses at secondary locations.

²⁶ This would allow all types of commercial uses to disperse throughout the town centre whilst some uses such as pubs and cafes could become more numerous, it could mean the displacement of some retailers to secondary, and less attractive retailing locations.

²⁷ This would ensure that proposals for non-retail uses such as cafes or restaurants are considered in the context of the role and function of the centre and the potential loss of retail uses to the local community for their daily and more general shopping needs. Ministerial Interim Planning Policy Statement 02/2005, paragraph 10.3.7, states that local planning authorities should seek to retain an adequate level of provision for food shopping, together with post offices and pharmacies in existing centres. This policy option would support this approach.

<p>2. Locate developments so as to minimise the demand for travel, especially by private car</p>	<p>+</p>	<p>This policy option would assist in the retention of a broad range of shopping opportunities within Tenby town centre, and make the centre attractive to shoppers who may otherwise travel to other centres.</p>	<p>-</p>	<p>Should non retailing uses over dominate the main shopping areas within the centre, it is likely to be less attractive to a full range of shoppers, and as a consequence residents and visitors may increase the number of journeys to alternative centres to obtain goods not available in Tenby.</p>	<p>+/-</p>	<p>This option would help to retain a range of shopping uses within the centres and would encourage shopping within local centres, rather than journeys to alternative 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.</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>?</p>	<p>Redevelopment can bring investment and help to conserve the townscape character. However restrictive policies may also promote long term vacancy in failing retail centres.</p>	<p>?</p>	<p>In a failing retail centre, new frontages and internal refurbishment can bring investment and help to conserve the townscape, if sympathetically applied, However an over concentration of non-retail uses will be detrimental to the existing retail character of Tenby.</p>	<p>?</p>	<p>Conservation of the townscape can occur when shops change occupiers and protect the retail character from an overconcentration of non-retail use. The policy may however lead to long term vacancy rates in times of economic hardship, to the detriment of the character of smaller Centres.</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>0</p>	<p>The policy is unlikely to prove relevant to this Sustainability Objective.</p>	<p>0</p>	<p>The policy is unlikely to prove relevant to this Sustainability Objective.</p>	<p>0</p>	<p>The policy is unlikely to prove relevant to this Sustainability Objective.</p>

5. Increase the number of visitors using the National Park outside the peak visitor season.	+	A broad range of shopping opportunities can help to attract visitors.	+ / -	A broad range of refreshment facilities can help to support visitors, albeit that this can, if over dominating, deter a full range of shoppers	+	A broad range of shopping opportunities can help to attract visitors.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
7. Reduce factors contributing to climate change.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	+/-	See objective 2 above
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	++	This policy option would assist in the retention of a broad range of shopping opportunities within Tenby town centre for the local community.	-	Should non retailing uses over dominate the main shopping areas within the centre, it is likely to be less attractive to a full range of shoppers and as a consequence it would be less able to support the local communities shopping needs	+	Maintaining a broad range of shopping opportunities can help to sustain the role of smaller Centres for their communities.
9. Encourage access for all to the National Park, reflecting the social mix of society.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
10. Maintain the cultural	++	Ensuring that a diverse retail offer is retained will help to	-	Allowing non retail uses to dominate is likely to restrict the	?	This option is likely to help to conserve the retail character of

distinctiveness of communities.		maintain the functional role of the centre.		provision of facilities to the community.		retail centres. The policy may however lead to long term vacancy rates in times of economic hardship, to the detriment of the character of smaller Centres.
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.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The option is unlikely to prove relevant to this Sustainability Objective.
12. Reduce the negative impacts of waste.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	++	Ensuring that a diverse range of shops are retained within the main shopping area will help to serve community needs.	-	Allowing non retail uses to dominate centres, is likely to restrict the provision of facilities to the community.	+	This option would help to retain a range of shopping uses within the centres and would encourage shopping within local centres, therefore helping to sustain the use of existing community facilities.
14. Maintain and enhance biodiversity both	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.

within and outside designated sites					Objective.	
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
Overall assessment and suggested changes	+	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.	-	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.	+?	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
Recommendation	Option 1 is more likely to achieve sustainability objectives.					