

HS5/AP2 – PCNPA to add a list of employment sites to be protected to the appendix of the plan	16 <sup>th</sup> August 2019	SH		
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Edits highlighted in green.

4.246 The aim of this policy is to prevent the inappropriate loss of existing employment sites and buildings to other uses, unless there are overriding benefits that can be attributed to the new development or there is adequate alternative availability elsewhere in the locality. Employment in the National Park is generally small or micro-scale and scattered. 'Employment sites and buildings' means sites and buildings (whether currently in use or unoccupied) with planning permission or lawful use. In the National Park there is limited appropriate land to accommodate business developments. It is particularly important to protect existing sites such as former garage sites for reuse for employment undertakings and prevent redevelopment for other purposes. [Please see Appendix x for sites listed in the Annual Employment Survey 2017](#). In criterion a) the present use will be judged in terms of compatibility of the nature and scale of the use within the local area and its impact on the local road network. In criterion b) the assessment of adequate alternative

**APPENDIX X: EMPLOYMENT SITES LISTED IN THE ANNUAL EMPLOYMENT SURVEY REPORT 2017**

Ref	Site Name and location	Area (ha)	Use Class
EMP1	Former St Davids Assemblies, Glasfryn Road, St Davids	2.30	B2, B8
EMP2	South Hook LNG (part), Herbrandston	76.15	B2
EMP3	Salterns West, Tenby	2.15	B1, B2, B8
EMP4	Salterns East, Tenby	1.19	B1, B2, B8
EMP5	The Green, Tenby	0.32	B2, B8

## **Hearing Session 5: Action Point 2 – 3<sup>rd</sup> Response**

**HS5/AP2** – Thank you for your comments and I appreciate your concerns. I will respond to the points made in due course but just so I understand the issue, could the NPA explain why the large sites are monitored and what impact their loss to an alternative use would have on the diversity, viability and sustainability of the economy in the National Park?

### **Response**

The 'large sites' are included in the Pembrokeshire-wide survey due to their size – i.e., over half hectare. The survey was originally started by Pembrokeshire County Council as part of their AMR monitoring and later, following the update of the employment section of PPW and the publication of a revised TAN23 the National Park Authority joined to provide area-wide data. We included land allocated for employment use in LDP1 and other sites over half hectare (PCC's windfall site size for the survey).

The sites highlighted to the Inspector in my previous response now no longer include the former allocations from LDP1. Of the remaining sites:

South Hook LNG – this is a very large site, and unique in terms of location, historic and current use (petrochemical industry). The National Park Authority used the opportunity of its redevelopment to negotiate wider areas to be returned to their natural state for nature conservation benefits. Re-use of all or part of the site for other employment uses would be considered against Policy 45 of the Plan. It is likely given the size of the site that future uses would need to be considered through the major development tests.

Land at the Salterns and The Green, Tenby – originally this was surveyed as a single area, but later split into 3 for ease of mapping. The whole area comprises a number of small units and businesses which are important for Tenby. The policy approach in LDP2 adequately protects the use and re-use of the land for employment purposes. Re-use of the land for other purposes is limited by it being almost entirely within a C2 flood zone. It is also within the Coastal Change area and thus there will be opportunities for relocation of properties affected by sea-level rise and climate change should this arise.

The former St Davids Assemblies is a large factory within a wider site and is important locally as employment land for St Davids and the wider peninsula. Again the policy approach protects against unnecessary loss to other uses, other than employment.

Evidence contained in the Employment Background Paper shows that Pembrokeshire relies on small and medium size enterprises (94% of registered businesses in the County employ less than 10 people and 12% of the workforce are self-employed). The proposed policy approach allows for the protection of small sites and premises – not only those listed above at South Hook, Tenby and St Davids but also the much wider distribution of smaller sites and premises which do not match the size criteria individually to be included in the all Pembrokeshire survey.

Picking out the larger areas listed would give the impression of them having a greater status, which is unnecessary given the protection they have from the existing criteria policy approach and misleading in that they have no greater status than the myriad of other sites which are not identified.