

PEMBROKESHIRE COAST NATIONAL PARK AUTHORITY

LOCAL DEVELOPMENT PLAN

EXAMINATION

SCHEDULE OF MATTERS, ISSUES AND QUESTIONS

Important Notes:

- The purpose of the examination is to determine whether the PCNPA LDP is sound in accordance with the LDP Manual, Edition 2. **To be sound the Plan must be: consistent with other relevant documents; appropriate for the area in light of the evidence; and deliverable and effective.**
- Participants should only respond to the questions which directly relate to their previously-submitted written representations on the plan. Please clearly indicate in your statement(s) the question(s) you are answering.
- Further statements should be proportionate in length to the number of questions being answered and should not, in total, exceed 3,000 words per Matter.
- I am examining the plan as submitted by the National Park Authority. Therefore, I will not, at this stage, be considering the merits for development of sites not included in the plan.
- **If you have questions in respect of this document or any aspect of the Examination then please contact the Programme Officer, Caroline Llewellyn, on 01646 624800 (land line) or 07773932339 (mobile) or by email at programmeofficer@pembrokeshirecoast.org.uk**

Matter 1 – Plan Preparation and Strategy

Issue – Is the Local Development Plan legally compliant, and is the LDP Strategy justified and likely to be effective in ensuring that development needs of the Pembrokeshire Coast National Park can be met throughout the Plan period in a way that contributes to the achievement of sustainable development?

Plan Preparation

1. Has the Plan been prepared in accordance with the necessary procedural requirements?
 - a) Has the Plan been prepared in accordance with the Delivery Agreement, including the Community Involvement Scheme?
 - b) Has the Plan been subject to a robust Sustainability Appraisal, Strategic Environmental Assessment and Habitats Regulations Assessment/Appropriate Assessment?
 - c) Has the Plan been informed by a robust consideration of reasonable alternatives?
 - d) Has the Plan had regard to the requirements of the Well-being of Future Generations Act (Wales) 2015?
 - e) Has the Plan been subject to an Equality Impact Assessment?
2. Does the Plan provide an accurate and consistent description of the Plan area?

- a) Is the format of the Plan, particularly in relation to the numbering of strategic and non-strategic policies, referencing in policies and use of footnotes, clear and consistent?

Vision, Objectives and Strategy

3. Is the Plan's Vision sufficiently aspirational and locally specific to form the basis for planning to 2031?
 - a) Was the Vision reviewed as part of the replacement plan making process, and has it had regard to the NPA Management Plan and Single Integrated Plan?
4. Are the Plan's objectives SMART and capable of delivering on the identified Vision?
 - a) Were they reviewed as part of the replacement plan making process?
 - b) Should Objective E be amended to make reference to the need to sustain local communities?
5. Does the Plan's Strategy represent an appropriate approach for delivering, managing and distributing growth over the Plan period?
 - a) Should the Plan include a Key Diagram?
 - b) How has the Strategy been derived, was it reviewed as part of the replacement plan making process and is it based on robust evidence?
 - c) What are the key components of the Strategy and how do they interact?
 - d) Will the Strategy deliver the Vision and Objectives?
 - e) How have the spatial and growth elements of the Strategy been derived, and should they be expressed in specific strategy policies?
 - f) Does the Strategy represent a sustainable approach to planning, over the plan period, and does it effectively link transportation, employment and residential growth?
 - g) Has the Strategy been informed by the findings of the local housing market assessments?
 - h) Does the Strategy maximise the use of previously developed land? and adopt the sequential approach to the release of land as set out in Planning Policy Wales?
 - i) Is the Strategy and policy framework consistent with national policy relating to Flood Risk?
6. Is the Plan's Strategy consistent/compatible the following plans and strategies?
 - a) The Wales Spatial Plan and other national policy?
 - b) Regional plans and strategies?
 - c) The plans/strategies of neighbouring authorities? and
 - d) Does the Plan reflect the strategies and proposals of infrastructure providers?
7. How has the Settlement Hierarchy been derived, and is it based on robust evidence?
 - a) Has the Settlement Hierarchy been reviewed as part of the replacement plan making process?
 - b) Is the structure of the Settlement Hierarchy locally distinct?

- c) Are the requirements of Policy 2 clear, does it provide an appropriate framework for new development in Tenby Local Service and Tourism Centre, and should it make reference to the suggested need for a marina and the enhancement of St Catharine's Island?
- d) Is Policy 3 clear and does it provide an appropriate framework for managing development in Newport?
- e) Do the requirements of Policy 5 provide a clear and appropriate mechanism for managing development in St David's Local Centre?
- f) Are the requirements of Policy 6 clear, does it provide an appropriate framework for managing development in rural areas, and should the requirements of the first sentence of paragraph 4.46 be included in the Policy?
- g) Are the requirements of Policy 7 clear and does it provide an appropriate framework for managing development in the Countryside?

8. Is the approach to site selection sufficiently clear and transparent, and is it founded on a robust evidence base?

- a) Are the allocated sites based on a robust site assessment methodology that takes into account all potential constraints?
- b) Have all infrastructure requirements been considered to ensure the timely deliverability of allocated sites?

9. Will the requirements of the Flood and Water Management Act 2010, in respect of sustainable drainage systems have an impact on the development capacity, viability and/ or deliverability of allocated sites?

11. Will the Plan be supported by Supplementary Planning Guidance?

Matter 2 – Special Qualities of the National Park

Issue: Does the Plan provide a framework for the management of the Special Qualities of the National Park that is soundly based, justified and consistent with the requirements of national policy?

Special Qualities of the National Park

1. Does Policy 8 provide adequate protection for the Special Qualities of the National Park, and is it founded on robust evidence?

- a) Is the policy consistent with the requirements of other legislation and national planning policy?
- b) Are the requirements of Policy 8(e) clear and does it provide an appropriate framework for managing the impact of development on the National Park's ecosystems?

2. Is the framework for assessing and managing the impact of light pollution contained in Policy 9 clear and consistent with national policy?

Nature Conservation

3. Does the Plan provide an appropriate level of protection for statutory and non-statutory sites of biodiversity, nature conservation and geological importance?

- a) Are Policies 10, 11, 12 and 13 consistent with the requirements of national planning policy and other legislation ?
- b) Does Policy 12 provide an appropriate policy framework for assessing and managing the impact of development proposals on Local Sites of Nature Conservation or Geological Importance, are the designations contained in the policy identified in the Plan and annotated on the Proposals Map?
- c) Does Policy 13 provide an appropriate policy framework for assessing and managing the impact of development proposals on biodiversity?

Welsh Language

4. Does the Plan's strategy adequately safeguard the interests of the Welsh language?
- a) How have the settlements identified in paragraph 4.80 been defined, and should they be included in Policy 14?
 - b) To what scale of development do the requirements of Policy 14 apply?
 - c) What type of mitigation measures are appropriate in the National Park?

Heritage

5. Is Policy 15 clear and consistent with the requirements of The Historic Environment (Wales) Act 2016?

Landscape, Public open Space and Green Wedges

6. Does Policy 16 provide an appropriate policy framework for assessing and managing the impact of development proposals on the landscape and seascape?
7. Should Policy 17 be deleted and replaced with separate policies for the protection and provision of public open space and the designation of Green Wedges?
- a) Is the designation of 43 no. Green Wedges justified, supported by robust evidence and have they been reviewed as part of the replacement plan making process?
 - b) Does the Plan provide an appropriate mechanism for protecting existing, and securing the provision of new, public open space?
 - c) Are the boundaries of the public open spaces annotated on the inset maps C41 and C42 – Tenby correct?
8. Does Policy 19 provide an appropriate mechanism for managing development within Porthgain, Saundersfoot, Solva and Tenby Harbours, and should it make reference to other smaller harbours in the National Park?

Matter 3 – Major Development, the Potential for Growth

Issue: Does the Plan provide a framework for the management of major development in the National Park that is soundly based, justified and consistent with the requirements of national policy?

Major Development

1. Is the explanation of Major Development in paragraph 4.117 sufficiently clear?
2. Should Policy 21 be relocated to the National Park Purposes and Spatial Strategy Chapter?

Minerals

3. How will the demand for minerals, in terms of hard rock and sand and gravel, be met over the Plan period, and does this approach accord with national policy?
4. Does the Plan adequately safeguard mineral resources?
5. Does the Plan provide adequate buffer zones around mineral reserves?

Waste

6. Is the Plan's waste strategy consistent with national policy?
7. Are the requirements of Policy 29 (e) and (f) clear?

Matter 4 – Climate Change, Sustainable Design, Renewable Energy and Flooding

Issue: Does the Plan provide a framework for the management of Climate Change, Sustainable Design, Renewable Energy and Flooding in the National Park that is soundly based, justified and consistent with the requirements of national policy?

Sustainable Design

1. Does Policy 30 provide an appropriate framework for managing good design in all forms of development?

Renewable Energy

2. Does the Plan provide an appropriate policy framework for realising the area's potential for renewable energy generation?

Flooding and Coastal Inundation

3. Do Policies 33 and 35 provide a robust and consistent framework for the management of surface water drainage, flooding and coastal inundation?

4. Do Policies 37 and 38 provide a clear and consistent mechanism for managing the relocation and replacement of dwellings/development affected by coastal change?
5. Is the Plan supported by a strategic flood consequences assessment?
 - a) Have all the allocations been subject to a robust assessment methodology and are all the allocations consistent with the approach to flooding set out in national policy?

Matter 5 – Visitor Economy, Employment, Community Facilities, Retail and Transportation

Issue: Are the Plan's requirements for visitor economy, employment, community facilities, retail and sustainable transport supported by robust and credible evidence and consistent with national policy?

Economy

1. What is the Plan's overarching strategy for the economy of the National Park, and is it supported by robust evidence?

Visitor Economy

2. Does the Plan, through Policy 39 provide an appropriate framework for the consideration of proposals for new or enhanced tourism accommodation, facilities and attractions?
3. Does Policy 40 provide an appropriate framework to manage the alternative uses for all existing tourism development?
4. Why do Policies 39(d) and 41 seek to prevent the construction of new self-catering accommodation on greenfield sites, and is this approach supported by robust evidence?
5. Are the requirements of Policies 42 and 43 clear and consistent with national policy?

Employment

6. Is the Plan's employment strategy founded on a robust evidence base and is it consistent with national Policy?
 - a) What are the key drivers for change in National Park's employment market? and how has the Plan addressed these considerations?
 - b) Should the Plan allocate land for employment related development?
 - c) Does the Plan provide a clear framework for the development of rural enterprises?
7. Does the Plan provide sufficient protection for existing employment land and property?
 - a) Does the evidence base contain a robust quantitative and qualitative analysis of the existing employment land and property?

- b) Does Policy 45 provide an appropriate framework for the safeguarding of existing key employment sites?
- c) How will proposals for alternative uses be assessed?

Retail

8. Is the Plan's retail strategy founded on robust evidence, and is it consistent with national Policy?

- a) Does the retail strategy take into account the envisaged growth in other sectors, particularly housing and the visitor economy?
- b) Should Policy 54 include reference to the need for new retail floorspace in the National Park over the Plan period?
- c) How will this need for additional retail floorspace be met?
- d) Are the requirements of Policy 56 supported by robust evidence?

9. Do the Plan's retail policies provide an appropriate level of protection and flexibility to manage the hierarchy of shopping areas?

- a) How will the Plan assess proposals for the redevelopment of existing retail premises for non-retail uses?

10. Is the Plan's retail strategy sufficiently flexible to respond to changing circumstances and does it include clear and appropriate mechanisms for implementation and monitoring?

Transport

11. Does the Plan sufficiently promote the integration and co-ordination of transport measures and land use planning?

- a) Should the Plan identify the Road and Cycle schemes identified in Table 3 of the Sustainable Transport Background Paper (NPA068)?

12. Does the Plan adequately promote active travel, and reduce the need to travel?

13. Are the requirements of Policy 58 clear and consistent with the requirements of national policy?

Community Facilities

14. Is the Plan's approach to community facilities appropriate and founded on robust evidence?

15. Does Policy 53 provide an appropriate mechanism for securing new community facilities and infrastructure?

- a) Does the policy provide an appropriate framework for the protection of existing, and delivery of future, community facilities and infrastructure?
- b) Does the policy provide a clear and consistent framework for securing planning obligations?

Matter 6 – Housing Provision and Distribution

Issue: Is the provision and distribution of housing soundly based, supported by robust and credible evidence and is it consistent with national policy? And will it be met during the Plan period?

Provision

1. Should Policy 47 be relocated to the National Park Purposes and Spatial Strategy Chapter?
2. Is the housing requirement figure of 960 dwellings appropriate?
 - a) Has the Plan been informed by a robust assessment of the housing requirement, having regard to Planning Policy Wales?
 - b) In identifying the requirement figure, has adequate regard been paid to the Welsh Government household and population projections?
 - c) Have alternative housing growth scenarios been considered, if so, why have they been discounted, and why has the preferred option been chosen?
 - d) Has the requirement figure been informed by a robust assessment of the main local influences on housing demand in the National Park including, decreasing household formation size, migration levels, and vacancy rates?
 - e) Does the Plan place too much emphasis on market housing as an enabler for the delivery of affordable housing?
3. Is the housing supply calculations of 1,150 appropriate?
 - a) What is the make up of the housing land supply?
 - b) Should Policy 48 also include details of the committed sites?
 - c) Is the estimated yield of units from committed and windfall sites realistic and based on available evidence? and has a non-delivery allowance been defined and applied?
 - d) How has the flexibility allowance of 16% been defined, and is it based on robust evidence?
 - e) Will there be a 5-year supply of housing for the duration of the Plan period? and how has this been calculated?
4. Will the Plan deliver the housing requirement?
 - a) Are the site allocations available and deliverable within the anticipated timescales? Are the allocations supported by a robust and comprehensive site assessment methodology, free from significant development constraints and demonstrated to be economically viable?
 - b) Should Table 7: Housing Allocation – Requirements be relocated to the Appendix, expanded to include committed sites, and provide details of all known constraints, planning obligations and infrastructure requirements?

Distribution

5. Is the spatial distribution of housing provision sustainable and coherent?
 - a) How will new windfall development within each tier of the settlement hierarchy be assessed and managed?
 - b) Is the spatial distribution of housing allocations and windfall opportunities consistent with the identified settlement hierarchy?

- c) Have the centre boundaries been drawn consistently and coherently?
- d) Should more housing land be allocated in Tenby?
- e) In the absence of defined centre boundaries in small villages can the level of growth be effectively controlled? and should development in these villages be restricted to infill only?

6. Is the Plan's housing strategy sufficiently flexible to respond to changing circumstances?

Matter 7 – Affordable Housing, Gypsy and Travellers Accommodation

Issue: Are the requirements for affordable housing and Gypsy and Travellers accommodation supported by robust and credible evidence and consistent with national policy? And will they be met during the Plan period?

Affordable Housing

1. Is the required level of affordable housing need based on robust evidence?
 - a) Is the Local Housing Market Assessment (LHMA) sufficiently robust to inform the Plan's housing strategy?
 - b) What scale of housing need is identified in the LHMA?
 - c) What mix of tenure (e.g intermediate or social rented) and of type dwelling (bedroom size) is required?
 - d) Will the affordable housing target of 250 dwellings meet the local housing need, if not what other mechanisms are available?

2. Are the requirements of Policy 49 clear, and consistent with national policy?
 - a) Should the requirements of Table 9 be included in the Policy?
 - b) How will off site or financial contributions for affordable housing be managed?
 - c) Should the Plan include a separate policy for securing affordable housing on exception sites in rural areas?
 - d) Is reference to Policy 53 necessary?

3. Are the required affordable housing contributions founded on a credible assessment of viability?
 - a) Are the affordable housing contributions contained in Table 9 based on robust viability evidence?
 - b) How have the site thresholds contained in Table 9 been defined?
 - c) Does Table 9 reflect the findings of the Affordable Housing Viability Study (NPA042), and if not why not?
 - d) How have the levels of contribution taken into account rising build costs, planning obligations, sustainable urban drainage systems and other associated requirements?
 - e) Do the BICS build costs take into account the cost of providing fire sprinklers, if so what allowance per dwelling is made for the provision?
 - f) Is Table 9 sufficiently clear, particularly with regard to the differing requirements for the geographical areas, and should these areas be shown on the proposals map?

4. Will the Plan deliver the affordable housing requirement?
 - a) Is the affordable housing target of 250 dwellings based on robust evidence?

- b) How will the affordable housing target be delivered?
- c) How will off-site contributions be secured, and what mechanisms are in place to ensure that the level of contributions sought are appropriate?
- d) Will Policy 50 ensure a balanced mix of house types, tenures and sizes, and is the required density level appropriate for the National Park?

5. Is the spatial distribution of affordable housing sound and does it adequately reflect local needs?

Gypsy and Traveller Accommodation

6. Is the Plan based on a sound assessment of Gypsy and Traveller accommodation needs?

- a) Is the Gypsy and Travellers Accommodation Assessment (GTAA) robust enough to inform the Plan's strategy?
- b) Does the GTAA identify a need for new Gypsy and Traveller pitches, both permanent and transit, in Pembrokeshire over the Plan period, and how will this be met?

7. Does Policy 51 provide a clear and consistent framework for assessing proposals for additional Gypsy and Travellers sites, and is it consistent with national policy?

One Planet Development

8. Are the requirements of Policy 52 clear and consistent with the requirements of national policy?

Matter 8 – Allocated Sites

Issue – Are the allocated sites soundly based and capable of delivering new housing development over the Plan period?

1. Matters to be addressed for each site where appropriate:

- Site name/ref and scale parameters?
- What is the current use of the site?
- What is the proposed use of the site?
- Is the identification of the site essential to the soundness of the Plan?
- Are there any significant obstacles to development within the Plan period?
- What are the timescales for delivery?

Matter 9 – Monitoring Framework

Issue: Is the Plan's monitoring framework robust and capable of assessing delivery over the Plan period?

Monitoring and Implementation

3. Does the Plan provide an appropriate monitoring framework that will enable it to adapt to changing circumstances?
4. Does the Plan provide clear and effective guidance on implementation, monitoring targets and triggers for review?

NKG
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