2nd Deposit Revised LDP – Commentary

| Reference and Comment | Support/Object/  Other |
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| 1. Spatial Strategy |  |
| The National Park Authority has no comment on the spatial strategy proposed. | No comment. |

| Reference and Comment | Support/Object/  Other |
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| 1. Employment | |
| The Spatial Strategy commentary above sets out where there is consistency of approach on where employment undertakings can take place in the County along with notes of clarification.  The employment and economic development strategy of Carmarthenshire County Council’s Preferred Strategy focusses on the Swansea Bay City Deal, and other Carmarthenshire-specific strategies. Carmarthenshire County Council and this National Park Authority are stakeholders in a Regional Strategic Economic study along with Pembrokeshire County Council and Brecon Beacons National Park Authority. The final report was published in October 2019. The study broadly concludes that there is sufficient strategic land available to meet demand across the area. The policy approach across the Pembrokeshire County Council, Carmarthenshire County Council and Pembrokeshire Coast National Park Authority is to protect strategic and smaller employment sites for employment use. | Support the general conformity of approach. |
| 1. Housing Growth |  |
| Pembrokeshire Coast National Park Authority has no comment on the anticipated scale of growth proposed. |  |
| 1. Affordable Housing |  |
| The National Park Authority has no comment. | No comment. |
| Climate Change |  |
| The Authorities have a shared understanding of the need to plan for climate change and to mitigate its impacts and to provide for high quality design to ensure that new development is adaptable to climate change.  This National Park Authority supports the approach taken to future-proofing communities in light of predicted sea-level rise and the identification of a Coastal Change Management Area, supported by the South Wales Shoreline Management Plan. | Support in principle. Support Policy PSD1 Placemaking and sustainable places, Policy NE5 Coastal Management NE6: Coastal Development; and NE7 Coastal Change Management Area and SP16 Climate change.  Note: See comment across. |
| Visitor Economy |  |
| Both Authorities recognise the importance of the visitor economy to west Wales and aim to support the sector and attract visitors all year round. Both also recognise that some attractions require a countryside setting but that this should be the exception, and the majority of tourism related development being sustainably located. | Support SP11 The Visitor Economy, VE1 Visitor Attractions and Facilities; VE2 Holiday Accommodation; VE3 Touring Caravan, camping and Non-Permanent Alternative Camping Accommodation; VE4 Static Caravan and Chalet Sites and Permanent Alternative Camping Accommodation. |
| Retail |  |
| Both Authorities’ strategies focus on the need to maintain / create vibrant and diverse town, district, and local centres. Retail provision in both Authorities is identified through the retail hierarchy with Carmarthenshire’s hierarchy being based on Sub Regional- High Order Town Centres, Mid Order Town Centres and Lower Order Town Centres. | Support SP 2 Retail and Town Centres |
| Renewable Energy |  |
| Both plans have regard to the need to generate more electricity from renewable sources. Pembrokeshire Coast National Park Authority has a renewable energy strategy policy seeking the delivery of appropriate renewable energy developments.  Both Authorities implement joint guidance on assessing the cumulative impact of wind turbines  It would be useful to confirm if Carmarthenshire intends to bring forward the Cumulative Impact of Turbine Guidance in the replacement Local Development Plan.  Carmarthenshire includes renewable energy as part of Strategic Policy 16: Climate Change (parts c and d), and both CCH1: Renewable Energy within Pre-Assessed Areas and Local search Areas and CCH”: Renewable Energy Outside Pre-Assessed Areas and Local Search Areas. Whilst Pembrokeshire does not have Local Search Areas, these policies are broadly in line with this Authority’s Renewable and Low Carbon Energy policy.  LSA for solar is shown on the Proposals map and it is considered that none of these are likely to have an impact on the Pembrokeshire Coast National Park. | Support SP 15 Climate Change and CCH1 / CCH2 |
| Environment |  |
| Both Plans seek to ensure that their Plan areas natural and historic environment and landscape will be protected from inappropriate development and, where possible, enhanced.  The Welsh language which continues to be an important component in the social, cultural and economic life of many communities will be protected and supported by managing development sensitively in areas where it has a significant role in the community. | Support SP8 Welsh Language and WL1 Welsh Language and New Developments, SP14  PSD3: Green and Blue Infrastructure Network  Maintaining and Enhancing the Natural Environment. SP 15 Protection and Enhancement of the Built and Historic Environment and BHE2 Landscape Character. SP14 Maintaining and Enhancement of the Built and Historic Environment  Note See across for comment. |
| Regional Working |  |
| Strategic Policy – SP 14: Maintaining and Enhancing the Natural Environment: Reasoned Justification: 11.409 In addition, and reflecting the duties placed upon Local Authorities, the Plan has regard to the National Park designation and the purpose for which it is designated, where it may affect the consideration of planning proposals.  BHE2: Landscape Character Development proposals should relate to the specific landscape and visual characteristics of the local area, ensuring that the overall integrity of landscape character is maintained by: …. b) protecting international and national landscape designations including National Parks and Areas of Outstanding Natural Beauty (AONB) and their settings;  11.456 Carmarthenshire is characterised by diverse and high-quality landscape resources and areas of notable visual value. It also includes or borders a range of landscape designations, including the Brecon Beacons and Pembrokeshire Coast National Parks and Gower AONB.  Appendix 2 Regional and Local Strategic Context:  Regional working: Pembrokeshire Coast National Park Authority’s adopted LDP is broadly compatible with a hierarchical settlement structure and a consistency in the broad planning policy approach with Carmarthenshire. Continuing liaison will ensure a mutual understanding of the respective approaches including through regional arrangements and the scope and progress of the Strategic Development Plan. A proactive approach towards regional and sub-regional working is implicit on policy matters, evidence gathering and strategic considerations. | Support |
| Minerals |  |
| The terrestrial sand and gravel landbank and the apportionment of provision to meet future needs is now considered on a regional basis with the RTS Second Review setting out the contribution that each constituent local authority should make towards meeting the demand for aggregates. There is no requirement for a landbank to be maintained within National Park (PPW 11)  Although Carmarthenshire is now in a separate sub-region to Pembrokeshire, previous combined working arrangements with regard to future apportionments and allocations for sand and gravel as suggested in the RTS1 as recommended to continue in RTS2 with the production of a Statement of Sub-regional Collaboration between Pembrokeshire, Carmarthenshire and Ceredigion to meet the allocation requirement of 3.626 million tonnes.  The Area of Search for Sand and Gravel is located to the west as shown on the Proposals Map, the northern end of which lies approximately 4.3km south east of the Pembrokeshire Coast National Park. | Support the compatibility of approach between the two Plans.  Support SP 18: Mineral Resources. |
| Waste |  |
| Both authorities’ policies on waste management are broadly aligned. Carmarthenshire acknowledges TAN 21 and the need for collaboration between local planning authorities to progress towards an integrated and adequate network for waste management. | Support  Support SP 19: Sustainable Waste Management |

Sustainability Appraisal/Strategic Environmental Appraisal

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| Appendix E: Growth Options  1st Deposit LDP Preferred Growth Option: check shading for ISA3. The appraisal is ‘+/-‘and the shading is that of minor negative effect rather than the yellow of positive and negative effect.  Appendix F: ISA Strategic Policies  SP 2: Retail and Town Centres: ISA Objective 1 has a positive assessment but no commentary.  SP 10: Gypsy and Traveller Provision: ISA Objective 8 is neutral. Could this be a positive since providing sites sustains Gypsy and Traveller culture? |

Habitats Regulations Assessment

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| Comments:  Thank you for considering and incorporating PCNPA’s comments on the Habitat Regulations Assessment Report (2020) as detailed in the appendices to the Habitats Regulations Assessment Addendum report.  4.3 Interim action plan – land available for constructed wetlands.  It is suggested that it would be beneficial to include discussion of the identified lands current use (e.g. to eliminate land of existing or other potential nature conservation value from consideration).  Other discussion points:  The long-term use of wetlands as nutrient sinks is not well understood.  The ability of wetlands to remove nutrients may be influenced by climate change scenarios, e.g. drying out, flood events.  Page 8 (PPP) – while not yet adopted, we note that consultation recently (February 2023) closed on Dŵr Cymru Welsh Water’s draft Water Resources Management Plan 2024  **Typos**  “3.2.15 ‘screened out screened out’  3.3.2 ‘unlikely to have a significant effects’  4.2.17 ‘there are important’  4.2.20 ‘which can demonstrate not cause the failure’  4.3.1 ‘ready in conjunction’ |