

# **Pembrokeshire Coast National Park**

## **Local Development Plan (2015-2031)**

Session 4

**Thursday 4<sup>th</sup> July 2019 9.30am**

**Climate Change, Sustainable Design,  
Renewable Energy and Flooding**

**Hearing Statement**

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Bring to the session - paper (note web access available):

June 2019

**PEMBROKESHIRE COAST NATIONAL PARK  
AUTHORITY**

<b>Session/Matter 4 – Climate Change, Sustainable Design, Renewable Energy and Flooding</b> <b>Thursday 4<sup>th</sup> July 9.30am</b>													
<i>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?</i>													
<b>Sustainable Design</b>													
1. Does Policy 30 provide an appropriate framework for managing good design in all forms of development?	<b>JG</b>												
<p>NPA Response: Policy 30 is a strategic policy and therefore covers all forms of development including transport infrastructure. ( see criterion d) accessibility) <b>Exam06</b> Local Development Plan with Focussed Changes and PPW10 edits. The framework also covers 9 other criteria to ensure sustainable design objectives are considered in relation to decisions on design. Policies 31, 32, and 33 define sustainability in further detail with regard to amenity, minimising waste and surface water drainage.</p> <p>Welsh Water (Representation 1663/81) supports this policy (<b>NPA019</b> Authority Responses to Deposit Representations).</p> <p>Natural Resources Wales (1670/82) also supports this policy: <i>We agree with the wording of the policy and supporting text.</i></p> <p>Para 4.161 of <b>Exam06</b> states that Sustainable Design Guidance will be prepared by the PCNPA to support and explain the requirements of the policy to planning applicants. The LDP1 Policy 29 had SPG on Sustainable Design supporting the sustainable policy. This was a major piece of work commissioned on behalf of the 3 NPA of Wales. It was adopted by PCNPA in June 2011 and had a technical update in December 2013 (NPA073).</p> <p>It is envisaged that an update of this document (to include for example SABS procedures as necessary) would be the basis for an SPG to support LDP2 policy 30.</p> <p>With regard to monitoring of this policy, the PCNPA 2018 AMR highlighted the need for two new specific monitoring criteria of this policy to check its robustness. The AMR states:</p> <table border="1" data-bbox="347 1697 1284 1854"> <thead> <tr> <th>Policy</th> <th>Indicator 10</th> <th>Target</th> <th>Performance</th> </tr> </thead> <tbody> <tr> <td><b>Performance</b> Policy Area</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Sustainable Design Policy 29</td> <td>Incorporation of renewable energy technology within scheme</td> <td>Relevant schemes incorporating renewable energy technologies.</td> <td>N/A</td> </tr> </tbody> </table> <p>Given the emphasis in Technical Advice Note 12, July 2014 on developers needing to look to achieve the minimum carbon standard through passive design and energy efficiency first, before considering how further emission savings can be achieved through the use of low and zero carbon energy technologies this indicator is no longer considered appropriate (paragraph 5.4.4 of Technical Advice Note). <u>A revised indicator for the Deposit Local Development Plan 2 Policy 30 Sustainable Design has been included, to enable a meaningful monitoring of the policy in contributing towards sustainable design in all development.</u></p>	Policy	Indicator 10	Target	Performance	<b>Performance</b> Policy Area				Sustainable Design Policy 29	Incorporation of renewable energy technology within scheme	Relevant schemes incorporating renewable energy technologies.	N/A	
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<p>Sustainable Design Policy 29  Compliance with code for sustainable homes Target - 100% meeting national policy requirements  N/A Trigger: Failure to achieve across 100% of residential developments.  Reason: Requirement of Planning Policy Wales Technical Advice Note 22: Planning for Sustainable Buildings.  Analysis/Conclusion: This indicator is no longer relevant for this monitoring period, due to the changes to national planning policy. <u>A revised indicator for the replacement Local Development Plan Policy 29 Sustainable Design is being drafted, to enable a meaningful monitoring of the policy in contributing towards sustainable design in all development.</u></p> <p>The revised indicator for Policy 30 is Indicator 11, page 158 of (Exam06 Submitted LDP with Focussed Changes and PPW10 edits).</p> <p>Note: the other 5 criteria are monitored more specifically with other triggers.</p> <p>The objection 2897/84 from Marloes &amp; St Brides Community Council on Policy 31 Amenity Para 4.165 has been responded to in full (NPA019) NPA Responses to Deposit Representations.</p>	
<p><b>Renewable Energy</b></p>	<p>GL</p>
<p>2. Does the Plan provide an appropriate policy framework for realising the area's potential for renewable energy generation?</p>	
<p>NPA Response: Policy 34 sets out the manner in which small scale, medium scale and larger scale proposals will be considered in light of the findings of the Renewable Energy Assessment. The calculations of potential energy contributions can be found in Appendix 1 of the same document (NPA067). The indicators for Policy 34 can be found on pages 158-159 of Exam06 Local Development Plan 2 with Focussed Changes and PPW10 edits.</p> <p>Policy 33, a similarly worded policy in Local Development Plan 1 (NPA074) has been in operation since was adopted in 2010 and no issues have arisen from its implementation through the Annual Monitoring Reports (NPA077 to NPA084).</p> <p>Page 28 of the Renewable Energy Assessment (NPA067) recognises that the National Park contribution towards Welsh targets is likely to be limited because the size of renewables acceptable within the landscape of the Park are small. Many of the technologies now fall under permitted development rights.</p> <p>Please also see the assessment of Policy 34 on page 52 of the alternative Options &amp; Appraisal Background Paper NPA057.</p>	
<p><b>Flooding and Coastal Inundation</b></p>	<p>SH</p>
<p>3. Do Policies 33 and 35 provide a robust and consistent framework for the management of surface water drainage, flooding and coastal inundation?</p>	
<p>NPA Response: During the process of the Plan review and preparation, the National Park Authority has met with representatives of and consulted Natural Resources Wales. A representation of support for the policies has been received. See 1670/91(NPA019 NPA Responses to Deposit Representations).</p>	
<p>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?</p>	

<p>NPA Response: The policies have been prepared with support from Pembrokeshire County Council's Coastal Engineer who has responsibility for the Shoreline Management Plans for the area. Informal consultation on the methodology of defining the coastal change management areas (see Background Paper (NPA033)) was undertaken with the Senior Coastal Advisor at Natural Resources Wales, who commented: "<i>We support the approach you've followed and we're really pleased to see the intent of the SMP2s being applied this way as an exemplar.</i>" The approach is considered to be a clear and consistent framework within which to consider proposals needing to relocate from within coastal change areas. It is based on an approach taken by several authorities in the east of England and which has been in operation for several years.</p>	
<p>5. Is the Plan supported by a strategic flood consequences assessment?</p>	<p>SH</p>
<p>NPA Response: The Authority was informally advised by Natural Resources Wales that a strategic flood consequences assessment would not be required. This has been reinforced through formal consultation as no assessment was required.</p>	
<p>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?</p>	
<p>NPA Response: None of the allocations are in flood risk areas and all are supported by a robust assessment methodology. Please see the Candidate Sites Methodology Background Paper (NPA029/NPA030).</p>	

## Session 4 – Climate Change, Sustainable Design, Renewable Energy and Flooding

Representor	Change sought	Why NPA do not think this is a sound approach
2897/84 Marloes & St Brides Community Council	See <b>NPA19</b> Deposit Representation and Authority response.	See across.