

## Report of Strategic Policy Manager

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**Subject: Draft Consultation Response to Pembrokeshire County Council's Re-Deposit Local Development Plan 2.**

### **Purpose of Report**

The purpose of this report is to seek approval to submit the consultation response (see Appendix A) on Pembrokeshire County Council's Local Development Plan 2 Re-Deposit Plan and accompanying documents.

### **Background**

Pembrokeshire County Council is consulting on its Re-Deposit Local Development 2 from 21 October to 16 December. The Re-Deposit Plan is the second Deposit consultation plan the Council has consulted on, with the first Deposit Plan consulted upon in 2020 prior to the Covid-19 pandemic.

The Local Development Plan is a statutory plan to provide for new growth and development that is needed to support communities and business up until 2033 and provide ongoing protection for Pembrokeshire's high-quality environment and landscapes. Pembrokeshire County Council's Local Development Plan covers the area of Pembrokeshire outside the National Park.

The LDP will be examined by an independent Inspector to ensure the Plan has been prepared in accordance with procedural requirements and to determine whether the plan is sound against three tests of soundness:

- 1: Does the plan fit?
- 2: Is the plan appropriate?
- 3: Will the plan deliver?

The first soundness test; Does the plan fit? Is to ensure the plan takes account of other plans and strategies and is consistent with those of neighbouring planning authorities. The Draft Consultation Response (Appendix A) has focussed on the soundness test of whether the plan 'fits' and is compatible with the strategy and policies of the National Park's adopted Local Development Plan 2 (adopted September 2020).

### **Legal Background**

It is a statutory requirement for all Local Planning Authorities in Wales to prepare a Local Development Plan, under Section 62 of The Planning and Compulsory Purchase Act (2004). Local Planning Authorities are required to formally review LDPs and keep them up to date. The Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 (as amended) prescribe the form, content and preparation procedures for preparing and reviewing LDPs.

## **Programme**

The timetable for Pembrokeshire County Council preparing its LDP 2 is set out in its Delivery Agreement. Following the Re-Deposit consultation, the authority will submit the LDP to Welsh Government for examination by June 2025. Subject to the outcome of the examination, adoption of the LDP is anticipated in May 2026.

## **Legal Considerations**

These will for Pembrokeshire County Council to determine.

## **Financial considerations**

The comments have been prepared by the Strategic Policy team. No additional cost to the Authority will be incurred.

## **Welsh Language considerations**

It is a matter for Pembrokeshire County Council to ensure that the publication and consultation exercises are carried out in accordance with the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards Regulations (No.1) 2015. The impacts on the Welsh language also forms part of the appraisal process.

## **Equality, Socio- Economic Duty, Human Rights**

The planning system seeks to progress legitimate aims by managing the development and use of land in the public interest to contribute to achieving sustainable development. It reconciles the needs of development and conservation, securing economy, efficiency and amenity in the use of land, and protecting natural resources and the historic environment. Human rights under Articles 1 (right to peaceful enjoyment to property), 8 (right to respect for the home, private and family life) and 14 (right to equality), are the most relevant ones. Proportionality means that the measure which interferes with the right must strike a fair balance between the aim and the right which it interferes with.

The process for Local Development Plan preparation and its rigorous assessment procedures will support this approach.

## **Well-being of Future Generations (Wales) Act**

In responding to this consultation, regard has been given to the requirements of the Well-being of Future Generations (Wales) Act 2015.

## **Recommendation**

Members are asked to approve:

1. The Draft Consultation Response (Appendix A) on Pembrokeshire County Council's Re-Deposit Local Development Plan 2.

## **Background documents**

Pembrokeshire County Council's Re-Deposit Local Development Plan 2 and accompanying documentation

[Deposit - Pembrokeshire County Council](#)

*(For further information please contact Emma Gladstone, Strategic Policy Manager extension 4820.)*



**Pembrokeshire County Council Local Development Plan 2 2017-2033 Re-Deposit Plan 2 Draft September 2024 Text – Commentary**

<b>Reference and Comment</b>	<b>Support/Object/Other</b>
<p><b>Urban/Rural Split of Allocations: Paragraph 3.13</b> Both the adopted LDP 2 for the PCNPA and the Re-Deposit Plan for PCC plan direct a higher level of development to the larger centres. The PCNPA supports the proposed 60/40% split between Urban Settlements which includes the Regional Growth Areas and the Rural Settlements in the Re-Deposit LDP 2.</p>	<p><b>Support</b> the conformity of approach.</p>
<b>Strategic Policies</b>	
<p><b>Policy SP 1 Creating Sustainable Places</b></p>	<p><b>Support approach</b> in principle.</p>
<p><b>SP 2 Housing Requirement:</b> Pembrokeshire County Council and the Pembrokeshire Coast National Park Authority are in broad agreement on the anticipated scale and distribution of growth. Pembrokeshire County Council and the Pembrokeshire Coast National Park Authority share the view that a higher than Welsh Government projection is deliverable in both planning authority areas (as demonstrated with historic build rates). Such an approach will help address affordable housing need and is likely to deliver a more balanced population profile than that projected with lower growth levels.</p>	<p><b>Support</b> the conformity of approach with Policy SP 2 Housing Requirement.</p>
<p><b>SP 3 Affordable Housing Target:</b> Both Plans place a strong emphasis on delivering affordable housing to meet local needs. There is a shared approach to identifying the scale of need using the Local Housing Market Assessment. The replacement Local Housing Market Assessment for Pembrokeshire (2023) remains in draft and is awaiting approval from Welsh Government.</p> <p>Both plans aim to address newly arising need and seek to contribute to meet the existing need. The authorities liaise directly regarding affordable housing delivery.</p>	<p><b>Support Policy SP 3 Affordable Housing Target</b> in term of the conformity of approach and continuing to liaise on affordable housing policy and guidance development.</p>
<p><b>SP 6 – Settlement Hierarchy:</b> Both PCC’s Re-Deposit Plan and PCNPA’s adopted LDP have devised a settlement hierarchy and direct development to the highest tiers of the hierarchy in line with sustainability objectives. PCC ‘s hierarchy identifies the four Regional Growth Areas as identified in Future Wales in Tier 1 along</p>	<p><b>Support SP 6 – Settlement Hierarchy:</b> - there is conformity of approach in relation to the two Plan’s</p>

<b>Reference and Comment</b>	<b>Support/Object/ Other</b>
<p>with other urban areas. The PCNPA's LDP was prepared prior to the publication of Future Wales and took account of the vision and objectives of the Wales Spatial Plan 2008 Update.</p> <p>It is noted that the Re-Deposit Plan has promoted Narberth from a Rural Town in the Preferred Strategy to an Urban Settlement. This change places Narberth in the same tier of the hierarchy as the Regional Growth Areas as identified in Future Wales.</p> <p>The majority of residential development in PCC's area will be directed to the Urban Settlements, Service Centres and Service Villages. Land is allocated for development for employment and other land uses in most Urban Settlements to support their continued role as centres of economic, social and cultural activity.</p> <p>The table below shows the compatibility of approach at higher and lower tiers in both Plans.</p> <p>In terms of additional comment:</p> <p><b>Service Centre/Local Centre:</b> Crymych is identified as a service centre (Tier 2a) in PCC's Re-Deposit Plan and as a local centre (Tier 2) in PCNPA's LDP 2.</p> <p><b>Service Centres/Rural Centres:</b> Some Rural Centres (Tier 3) in the Pembrokeshire Coast National Park are listed as Service Centres (Tier 2a) in the Council's Plan: Lamphey and Llangwm. These Centres lie almost wholly outside the National Park and the role of the Pembrokeshire Coast National Park Local Development Plan has been to 'compliment' the Council's defined approach at these Centres.</p> <p><b>Service Villages/Rural Centres:</b> Some Rural Centres (Tier 3) in the Pembrokeshire Coast National Park are listed as Service Villages (Tier 2b) in the Council's Plan: Carew, Cosheston, Hook, Houghton, New Hedges, Roch, Square &amp; Compass.</p> <p><b>Local Villages/Rural Centres:</b> Pleasant Valley and Wiseman's Bridge are identified as cluster local villages in PCC's plan (Tier 2c) and are listed as Rural Centres (Tier 3) in the Pembrokeshire Coast National Park Local Development Plan. The cluster local villages do not have allocations.</p>	<p>spatial strategies and the approach to cross-boundary settlements.</p>

<b>Reference and Comment</b>	<b>Support/Object/ Other</b>
<p><b>Countryside: SP 11 Countryside:</b> The PCNPA's LDP also identifies the following developments may be permitted in the countryside (PCNPA's policy 7) affordable housing exception site (criterion i); to help communities adapt and relocated due to coastal change (criteria j&amp;k); Gypsy and Traveller site (criterion l) and renewable energy proposals (criterion m).</p>	

Policy <sup>1</sup> Pembrokeshire County Council Pembrokeshire Coast National Park	Urban Settlements / Tenby	Service Centres / St David's, Saundersfoot, Newport, Crymych	Service Villages / Rural Centres <sup>2</sup>	Local Villages (including Cluster Villages) / Rural Centres <sup>3</sup>
Housing Allocations	✓	✓	✓	
Housing Allocations	✓	✓	✓	
Windfall market housing	✓	✓	✓	✓
Windfall market housing	✓	✓	✓	✓
Local need affordable housing	✓	✓	✓	✓
Local need affordable housing	✓	✓	✓	✓
Exception sites for affordable	✓	✓	✓	✓
Exception sites for affordable	✓	✓	✓	✓
Employment Allocations	✓	✓	✓	
Employment Allocations	✓	✓	✓	
Employment sites through criteria-based policies	✓	✓	✓	✓
Employment sites through criteria-based policies	✓	✓	✓	✓
Community facilities – within or well-related to settlements	✓	✓	✓	✓
Community facilities – within or well-related to settlements	✓	✓	✓	✓

<sup>1</sup> In principal both authorities would support these development types in these locations. However, individual allocations are dependent on whether or not specific sites are available and deliverable and this may not be achievable in some locations.

<sup>2</sup> Centre with a Centre Boundary

<sup>3</sup> Centre without a Centre Boundary



<p><b>Employment</b></p> <p>The Spatial Strategy commentary above sets out where there is consistency of approach on where employment undertakings can take place in the County.</p> <p>The County Council and the National Park Authority are stakeholders in a Regional Strategic Economic study along with Carmarthenshire 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.</p> <p>Overall, the approach taken by Pembrokeshire County Council is considered to be compatible with the Pembrokeshire Coast National Park spatial strategy.</p>	<p><b>Support</b> the conformity of approach in <b>SP 6 – Settlement Hierarchy.</b></p>
<p><b>SP 11 Countryside:</b> Both plans recognise the importance of agriculture and agricultural support industries to Pembrokeshire and the need to support appropriate rural diversification. As stated above, the NP’s LDP identifies a number of exception development that isn’t reflected in PCC’s policy.</p>	<p><b>Support</b> SP 11 Countryside criterion 3) diversification and criterion 4) The re-use and conversion of appropriate existing buildings.</p>
<p><b>Policy SP 13 Port and Energy Related Development and Celtic Freeport</b></p>	<p><b>Support:</b> It is noted that with regard to Policy SP 13 Port and Energy Related Development the National Park Authority suggested at Preferred Strategy Stage that the reference to excluding wind energy generation would provide clearer advice if inserted in the policy text. This has been done and this is supported. The intention to prepare Supplementary Planning Guidance to support the designation of the Celtic Freeport is welcomed.</p>
<p><b>SP 16 Retail Hierarchy:</b> Both Authorities’ strategies focus on the need to maintain / create vibrant and diverse town, district and local centres, seeking to protect the established retail hierarchy.</p>	<p><b>Support</b> SP 16 Retail Hierarchy (and GN 31 Town Centre and Local Retail Development.)</p>

<p>Both plans recognise the need for mixed uses, with, for example, residential provision above ground floors.</p> <p>Both Plan's retail hierarchies are compatible and based on the findings of the South West Wales Regional Retail Study (February 2017) which identified no need for additional convenience retail floorspace.</p>	
<p><b>SP 17 Visitor Economy:</b> Both Authorities recognise the importance of the visitor economy to Pembrokeshire's economy and aim to support the visitor economy and to attract visitors all year round in appropriate locations. Recognition is given by both Authorities to the attraction of the quality of the natural environment and the need for its protection. Between them the Plan strategies will allow for a range of visitor accommodation.</p>	<p><b>Support</b> SP 17 Visitor Economy (and GN 54 Visitor Attractions and Leisure Facilities, GN 55 Service and Hotel Accommodation GN 56 Caravan, Camping and Chalet Development (see separate comment), and GN 57 Site Facilities)</p>
<p><b>SP 18 Non-Energy Minerals:</b> Both Authorities are within the West Wales sub-region with the apportionment of sand and gravel needing to be considered on a sub-regional basis.</p> <p>Both Authorities recognise the need to find new sources of sand and gravel outside the National Park and the allocation for a sand and gravel quarry to contribute to the sub-regional need is welcomed.</p>	<p><b>Support</b> SP 18 Non-Energy Minerals</p>
<p><b>SP 19 Welsh Language:</b> The Welsh language which continues to be an important component in the social, cultural and economic life of many communities in the County will be protected and supported by managing development sensitively in areas where it has a significant role in the community.</p> <p>Both Authorities have defined the scale of the development to which the policy would apply and in communities to reflect the Pembrokeshire average of Welsh speakers, noting the County Council's figures represent a more up to date percentage of Welsh speakers. This is considered to be a consistent approach in both Local Development Plans.</p>	<p><b>Support</b> SP 19 Welsh Language, GN1 General Development Policy. Similar approach taken.</p>
<p><b>Policy SP 21 Waste Prevention and Management:</b> The two Authorities are in agreement on their respective roles on waste planning and management. Each authority develops its own waste planning policies for the respective planning areas, but</p>	<p><b>Support</b> Policy SP 21 Waste Prevention and Management.</p>

<p>the County Council has waste management responsibility for the whole County.</p>	
<b>Area Wide Policies</b>	
<p><b>Policy GN 1 General Development</b></p>	<p><b>Support approach</b> in principle.</p>
<p><b>Policy GN 1, Criterion 3)</b> The National Park Authority welcomes and supports the reference in criterion 3 to the need to protection the special qualities of the National Park. Both Plans take account of the need to not compromise either individually or cumulatively the qualities of important landscapes including the Pembrokeshire Coast National Park.</p> <p>Paragraph 5.4 recognises that the Plan area has many landscapes which have close physical and functional interrelationships with the National Park and states that proposed development will need to respect that which is welcomed.</p>	<p><b>Support</b> Policy GN.1 criterion 3) protecting the special qualities of the National Park is supported.</p>
<p><b>Policy GN1, Criterion 6)</b> – this requires developments to be located in ‘an accessible location’. Paragraph 5.7 details that ‘development should be highly accessible’ but it is not clear what is meant by this term.</p>	<p><b>Note:</b> GN 1 – the Plan might benefit from clarification of the terms ‘accessible’ and ‘highly accessible’.</p>
<p>Paragraph 5.16 The supporting text to policy GN 1 refers to the preparation of joint SPG on Lighting and Dark Skies which is supported.</p>	
<p><b>Policy GN2 Sustainable Design and Placemaking</b></p>	<p><b>Support approach</b> in principle.</p>
<p><b>Policy GN3 Infrastructure and New Development:</b> Both authorities have adopted joint supplementary planning guidance on Planning Obligations and intend to prepare joint supplementary planning guidance for the replacement Local Development Plans.</p> <p>Both Plans seek to prioritise affordable housing provision in the case of housing developments where necessary.</p>	<p><b>Support</b> Policy GN 3 Infrastructure and New Development.</p> <p>Paragraph 5.32 states that PCC will discuss any proposals to set a Community Infrastructure Levy with the PCNPA. Further engagement on the progression of the Community Infrastructure Levy would be welcomed.</p>

<p><b>Policy GN 4 Resource Efficiency and Renewable and Low-carbon Energy proposals:</b> Both Plans seek the delivery of appropriate renewable energy developments, considering landscape impact alone and in-combination.</p> <p>Both Authorities have adopted joint guidance on assessing the Cumulative Impact of Wind Turbines.</p> <p>Both Authorities carry out joint monitoring of provision annually.</p> <p>Both Authorities have considered removal of temporary structures and community benefits.</p>	<p><b>Support</b> GN 4 Resource Efficiency and Renewable and Low-carbon Energy proposals.</p>
<p><b>GN 7 Cawdor Barracks including the former Brawdy Airfield</b> Criterion c) identifies part of the airfield as being specifically allocated for a solar PV array by Policy GN 5, but GN 5 does not identify any part of the site for solar. In addition, Candidate Site 184 states that the site is allocated for potential MOD development. A detailed assessment of the site was undertaken in summer 2019 by the National Park Authority and details of the Authority’s concerns relating to the impact development at this location would have on the special qualities of the National Park are included as part of this submission. Criterion h) which takes account of the potential landscape impact on the Pembrokeshire Coast National Park is welcomed.</p>	<p><b>Notes:</b> Clarification is requested regarding the allocation of the land in terms of a solar PV array and the safeguarding of the site for HRDF.</p>
<p><b>Policies GN 8 – 12 Employment</b> GN 11 Protection of Employment Sites and Buildings is in general conformity with PCNPA’s policy.</p>	<p><b>Support</b> Employment policies GN 8 - 12</p>
<p><b>Policy GN 16 Residential Allocations</b> – objection to allocation HSG/052/LDP2/1 – Adjacent to Lamphey School. The site is adjacent to Lamphey School and approximately 85 metres from the National Park. A detailed assessment of the site was undertaken in summer 2019 by the National Park Authority. Whilst the proposed developable area has been reduced in this Deposit Plan, concerns remain regarding the size and impact of the proposed development. Details of the Authority’s concerns relating to the impact development at this location would have on the special qualities of the National Park are included as part of this submission.</p>	<p><b>Object</b> – to residential allocation HSG/052/LDP2/1 as it is considered that it would have a detrimental impact on the special qualities of the National Park. (Please see attached site assessment 132 by the National Park Authority for further details).</p>

<p><b>GN 20 Local Needs Affordable Housing</b></p> <p>Indicative targets for affordable housing are set out in policy GN 20, which is based on the Financial Viability Report undertaken by Burrows-Hutchinson Ltd (July 2024).</p> <p>PCNPA wish to highlight the following inconsistencies between the plans for split settlements:</p> <ul style="list-style-type: none"> <li>- Cosheston, Hook, Houghton and Llangwm are situated in Band 2 in PCC’s LDP, which requires a commuted sum contribution for all sites below 50 units. Above 50% a 5% contribution is required which rises to 17.5% above 100 units. In PCNPA’s area, the settlements are within the ‘Estuary Hinterland’ housing market area where there is a requirement for 15% affordable housing on sites of 7 units and over.</li> <li>- Roch is situated in Band 2 in PCC’s LDP, whereas in PCNPA’s plan, Roch is within ‘St Davids and the North Coast’ housing area which has a requirement for 35% affordable housing on sites of 3 units and over.</li> <li>- Carew, Milton and Pleasant Valley are situated in Band 3 in PCC’s LDP 2 which seeks has a requirement for 12.5% affordable housing for sites over 10 units and rises to a 30% requirement for sites over 100 units. In the PCNPA’s adopted LDP, Carew is situated in the ‘south east’ housing market area which has a requirement for 50% affordable housing on sites over 2 or more units.</li> <li>- Lamphey is situated in Band 3 in PCC’s LDP 2. In the PCNPA’s adopted LDP Lamphey is in the ‘south west coast’ housing market area which has a requirement for 25% affordable housing on sites of 4 units and over.</li> </ul> <p>The PCNPA supports the commuted sum contrition rates to be charged on the basis of floorspace (per sq. metre) which aligns with the National Park’s approach.</p>	
<p><b>GN 24 and GN 25 Gypsy, Traveller and Show-people’s Sites and Pitches:</b></p> <p>The Authority supports the four Gypsy and Traveller Site Allocations (policy GN 24) which would provide 55 pitches to meet (and exceed) the identified need by the end of the plan period in 2033. It is a matter for PCC to demonstrate that the sites identified are deliverable. Both plans set out criteria based policies to consider proposals.</p>	<p><b>Support</b> the identification of allocated sites to meet the need identified in the Gypsy and Traveller Accommodation Assessment.</p>

<p><b>Policy GN 31 Town Centre and Local Retail Centre Development and paragraph 5.165</b> – this paragraph details that the reason for preventing concentrations of fast-food takeaways are related to the well-being of residents and visitors but the policy approach applies only to primary retail frontages. Such impacts are equally applicable to other commercial and retail areas where such premises are permitted. In addition, it would be helpful to quantify ‘unacceptable concentration of fast-food takeaways’ as detailed in the third bullet point of Policy GN 31.</p>	<p><b>Note:</b> It would be helpful to clarify the approach to fast food outlets in non-primary frontages and to quantify ‘unacceptable concentration’.</p>
<p><b>Policy GN 37 Working of Minerals:</b> The terrestrial sand and gravel landbank and the apportionment of provision to meet future needs is considered on a regional basis.</p> <p>There are current sand and gravel production sites in the Pembrokeshire Coast National Park, further sites and allocations in Ceredigion and some small-scale production in Carmarthenshire. However, the regional landbank for sand and gravel is rather limited in comparison with that available for hard rock. National Park sand and gravel production at the two current production sites will eventually cease and production and allocation sites elsewhere in the region are of limited capacity.</p> <p>New terrestrial production sites within the region but outside the National Park are needed and the need for a collaborative approach and a Statement of Sub-Regional Collaboration as identified in the Plan is agreed.</p> <p>The National Park Authority supports the allocated sites MN/000/LDP2/001 Trefigin Quarry extension to provide for future sand and gravel needs. Please see assessment Site 497 (Trefigin) regarding landscape mitigation requirements to protect the Special Qualities of the National Park.</p>	<p><b>Support</b> the compatibility of approach between the two Plans and with national planning policy.</p> <p><b>Support</b> Policy GN 37 Working of Minerals.</p> <p><b>Support</b> Trefigin and sand and gravel allocation in principle, subject to landscape mitigation measures (see Site Assessment 497)</p>
<p><b>Policy GN 46 Coastal Change</b> – criterion 3 does not allow the extension of an existing use class C residential property. This is not in conformity with TAN 15 which states that minor extensions should not raise significant issues unless there are adverse effects which would require appraisal of the full consequences of the development and the need to provide a Flood Consequences Assessment.</p> <p>The approach taken by PCNPA is to resist intensification of existing development unless it can be demonstrated that there will be no increased risk to life or significant</p>	<p><b>Support</b> approach in principle.</p> <p><b>Note:</b> Suggested inclusion of reference to minor extensions being acceptable where it can be demonstrated there are no adverse effects.</p>

increase in risk to property and this might be a more nuanced approach than simply restricting all extensions.	
<b>General Comments:</b> Appendix 1: Column 'Total' should read '5 Year Average'?	

## Sustainability Appraisal/Strategic Environmental Appraisal -

**SP2 Housing Requirement** – Housing requirement, assessment against SA Objective 10. The impact here is likely to be negative since the development of 6,800 new homes will increase emissions due to energy use, waste and travel. Mitigation measures required by National Policy may allow the reduction of per capita Carbon emissions.

**SP2 Housing Requirement** - assessment against SA Objective 14. Household and population increase will place increased pressure on inland water bodies for abstraction.

### **Strategic Policy SP 16 – Retail Hierarchy**

SA Objective 7 – Assessing impacts on Welsh Language is difficult but we feel that the fact the policy says “vibrancy, vitality and attractiveness of that centre, supporting the delivery of appropriate comparison and convenience retail, office, leisure, entertainment, cultural and community facilities”, provides a reasonable amount of certainty here that the impact may be positive. A large part of this policy seems to be around community building. Suggest a bit of a rewording here, assessment could be more positive.

**GN.1 – General Development Policy** - assessment against SA Objective 20. Policy seems to be lacking any reference to the historic environment in general beyond character. What about archaeology?

**HSG/052/LDP2/1 - Adj Lamphey School** – The National Park Authority has raised concerns over landscape impacts from the development of this site. We would suggest that this site is not compatible with SA Objective 19 on the grounds of impact to a protected landscape.



## Habitats Regulations Assessment

### Pembrokeshire County Council Local Development Plan 2 2017-2033 Deposit 2 Plan HRA September 2024

1. In general, we support the conclusions of the HRA.
2. We are pleased to see a number of references to the Pembrokeshire Coast National Park Management Plan 2020-2024, although we note that it is due to be replaced in early 2025.
3. HRA page 3, para J states: *“In respect to recreational impacts, existing mitigation provided by the Pembrokeshire Coast National Park Authority and partners through recreation management initiatives, is sufficient to mitigate impacts resulting from increased recreational use of European sites. As such, no adverse effect to the integrity of the Site will occur in regard to marine and terrestrial recreation.”*

Further references to recreation management policies from the National Park Management Plan 2020-2024 are made in Table 5.2 of the HRA. We would query the principle of reliance on management by third parties to provide mitigation of existing or novel recreational pressures potentially deriving from proposals outside of the National Park. Furthermore, the National Park Authority’s activities are broadly confined to the National Park area of Pembrokeshire, and therefore have no or limited relevance to mitigation of likely significant effect on European sites outside of this area.

#### Other comments:

P5 (and other instances in the HRA) typo: “Ramsey and St David Peninsula Coast”  
(replace with “Ramsey and St David’s Peninsula Coast”)

P5 (and other instances in the HRA) typo: “Stokhom” (replace with “Skokholm”)

<b>Site 132 Adj Lamphey School</b>	Mixed use – housing and school parking.
<b>VP1 and 2</b>	<b>View (Distance 0.14km looking Northwest)</b> A4139 immediately adjacent to the site and on the National Park boundary.
Baseline Description	The viewpoint is at the south-eastern corner of the site on the A4139. The National Park boundary follows the roadline here from the entrance to Honeyhill Grove to this viewpoint. The boundary extends along the eastern boundary of the site to viewpoint 2 before turning east along the line of the railway line. The land is more or less flat in this location. Views into the site are limited to the south by rising land.
Predicted change	Development would extend from the built area of Lamphey right up to the National Park boundary. The site currently provides an undeveloped buffer between Lamphey and the National Park and so development would impact on the character of the National Park.
Magnitude of Change	Very large – development of the site would be close-range, dramatic and prominent. It would appear large-scale and be dominant in the view from the National Park boundary. The close proximity of the development would form the dominant element of the view.
Type of Effect	The effect of development would have a significant adverse impact on the National Park and its special qualities.
<i>Significance of Effect</i>	Mitigation may be achieved only by developing only a very small area of this site, close to the existing buildings along the western boundary in line with the eastern boundary of the school playing field. Additional planting along the eastern boundary of the reduced site would also help mitigate the impact.
Split Centre	No issues.

<b>Site 132 Adj Lamphey School</b>	Mixed use – housing and school parking.
<b>VP3</b>	<b>View (Distance 1km looking south-west)</b> The Ridgeway to the east of Dewslake Farm.
Baseline Description	This viewpoint is on rising land to the north-east of Lamphey at a point where Headland Lane meets The Ridgeway. The National Park boundary runs along the road from Dewslake farm eastwards.
Predicted change	This vantage point looks down across Lamphey. For the most part views towards the village are screened by vegetation but at this viewpoint a bend in the road provides a view through the trees towards the site. From this viewpoint development would create a

	distinguishable change, as the built area would extend into land which is currently undeveloped, and a much larger settlement would be seen.
Magnitude of Change	Medium - The view is distant and brief but would result in a noticeable change in the existing view.
Type of Effect	The impact would be noticeable and negative.
<i>Significance of Effect</i>	Mitigation may be achieved only by developing only a very small area of this site, close to the existing buildings along the western boundary in line with the eastern boundary of the school playing field. Additional planting along the eastern boundary of the reduced site would also help mitigate the impact.
Split Centre	No issues.

<b>Site 184 Land at Cawdor Barracks and Former Brawdy Airfield</b>	The site is currently use for a mix of agriculture, military training, housing and an airfield. The proposed use is for housing, activity tourism, energy generation, employment and open space.
<b>VP1</b>	<b>View (<i>Distance 1.26 km looking Northwest</i>)</b>
Baseline Description	The viewpoint is to the east of the site, at a property known as Rhydgele which is on the National Park boundary.
Predicted change	Due to the local topography and vegetation the site is not visible from this location. The site is extensive however and depending on the type and density of development there is potential for increased noise and light pollution.
Magnitude of Change	Medium – the National Park in the vicinity of the site is undeveloped and tranquil and there is potential for this character to be noticeably altered through increased activity, noise and light.
Type of Effect	The effect would be dependent on the type and intensity of use of the site, but there is a considerable potential for a noticeable change in the character of this tranquil area of the National Park.
<i>Significance of Effect</i>	The effect would have a potentially harmful effect on the special qualities of the National Park. Mitigation would need to control lighting and noise.
Split Centre	This is not a split centre.

<b>Site 184 Land at Cawdor Barracks and Former Brawdy Airfield</b>	The site is currently use for a mix of agriculture, military training, housing and an airfield. The proposed use is for housing, activity tourism, energy generation, employment and open space.
<b>VP2 and 3</b>	<b>View (<i>Distance 1.77 km looking North</i>)</b>
Baseline Description	These viewpoints are close together to the south-east fo the site along the road marked as Erw Lon at Pen y Cwm. They are on the National Park boundary.
Predicted change	The site is visible through breaks in hedgerow vegetation along Erw Lon, but in the winter months the views would be much more extensive. Existing buildings within the site are clearly visible, extending towards a low ridgeline. The wider site is extensive and large areas are currently undeveloped land. Development of the site would impact this area of the National Park both visually and potentially in terms of increased noise and light pollution.
Magnitude of Change	Large – Development of the site would result in a prominent change in the existing view. Depending on the type and intensity of development, it would be prominent in the overall

	view and any high structures would create new visual focus.
Type of Effect	The development would result in a distinct change in the existing view and the character of this undeveloped area of the National Park.
<i>Significance of Effect</i>	The combination of the visual, noise and light pollution impacts would have a distinct and harmful effect on the special qualities of the National Park. Mitigation relating to design, restricting height and intensity of development, lighting and noise along with additional landscaping around and throughout the site would help to absorb the potential impacts.
Split Centre	This is not a split centre.

<p><b>Site 184</b>  <b>Land at Cawdor Barracks and Former Brawdy Airfield</b></p>	<p>The site is currently use for a mix of agriculture, military training, housing and an airfield. The proposed use is for housing, activity tourism, energy generation, employment and open space.</p>
<p><b>VP4 and 5</b></p>	<p><b>View (<i>Distance 3.49 km looking Northeast</i>)</b></p>
<p>Baseline Description</p>	<p>These viewpoints to the south-west of the site, on the Pembrokeshire Coast Path, above the bay known as Aber Dwyrain. The Coast Path is generally on cliffs in this area, on undulating ground but with considerable stretches of high flat land. The Coast Path frequently changes direction as it meanders along the coastal edge and when walking easterly there are several places where the forward view is straight towards the site.</p>
<p>Predicted change</p>	<p>This would depend on the type and intensity of development with potential for new buildings to be seen clearly and centrally in views from the Coast Path.</p>
<p>Magnitude of Change</p>	<p>This would depend on the type and intensity of development of this site, but there is potential for a very large change. When walking eastwards along the Coast Path, there are several locations where the path direction provides a forward view directly into the site within the wider landscape from the coast (St Brides Bay) across to the Preseli Hills in the background. Some of the existing distinct buildings at Brawdy – such as the control tower – are central to the view and appear on a low ridge. Intensification of development would impact on the view of what is generally a rural landscape. Light pollution would have significant potential to harm the special qualities of the National Park in this location.</p>
<p>Type of Effect</p>	<p>It is not possible to distinguish a National Park boundary when viewing this expansive area from this section of the Coast Path, and the wide ranging distances make for spectacular scenic viewing. Whilst the primary character of the Coast Path is the stunning coastal landscape, locations such as these give occasional opportunities to view the inland landscape. Development of the site has the potential to be central, closer range and dominant in views here. This would have a significant and harmful impact on the National Park and its special qualities.</p>
<p><i>Significance of Effect</i></p>	<p>It is difficult to determine whether it would be possible to mitigate any impacts to an acceptable level as it would depend on the type and nature of the development proposed. It may need to take the form of controls on design, restrictions on developing particular areas of the site, controls on lighting and tall structures. The land within the site undulates and there are existing buildings that cannot be seen from the National Park. Redevelopment of these areas would not be harmful visually,</p>

	other than potentially with increased lighting.
Split Centre	This is not a split Centre.

<b>Site 184 Land at Cawdor Barracks and Former Brawdy Airfield</b>	The site is currently use for a mix of agriculture, military training, housing and an airfield. The proposed use is for housing, activity tourism, energy generation, employment and open space.
<b>VP6 eastwards along the A487</b>	<b>View (<i>Distance 2.81 km looking East</i>)</b>
Baseline Description	This viewpoint is on the A487 at Lochvane. The road forms the National Park boundary from west of this viewpoint to Penycwm, to the south-east of the site.
Predicted change	Brawdy and the distinct existing buildings within the site are a familiar element of the views along this road. The control tower appears on the skyline along the majority of the views along the road. Any change would depend on the type and intensity of development at the site. There is significant potential for light pollution to impact on the character of the National Park along this boundary.
Magnitude of Change	Very Large – the proximity of the site to the viewpoint (road) and its context within a wider undeveloped landscape would have the potential to significantly impact the character of the National Park, visually and through light pollution.
Type of Effect	The greatest impact from this viewpoint is likely to be potential light pollution. This could significantly impact on the appearance of the area.
<i>Significance of Effect</i>	It is difficult to determine whether it would be possible to mitigate any impacts to an acceptable level as it would depend on the type and nature of the development proposed. It may need to take the form of controls on design, restrictions on developing particular areas of the site, controls on lighting and tall structures. The land within the site undulates and there are existing buildings that cannot be seen from the National Park. Redevelopment of these areas would not be harmful visually, other than potentially with increased lighting.
Split Centre	This is not a split Centre.



<b>Site 497 Adjacent to Trefigin Quarry</b>	The site is currently undeveloped and is used for agriculture. The proposed use is for a quarry.
<b>VP1</b>	<b>View (<i>Distance 0.47km looking Southeast</i>)</b>
Baseline Description	The viewpoint is from the junction with an un-named road and the public footpath just uphill from the property known as Penrhiw Forge. The view is rural in feel with Penrhiw Forge being the only dwelling and open fields with high hedgerows to the north of the viewpoint.
Predicted change	None – the site cannot be seen from the viewpoint.
Magnitude of Change	None – the site cannot be seen from the viewpoint.
Type of Effect	None – the site cannot be seen from the viewpoint.
<i>Significance of Effect</i>	None – the site cannot be seen from the viewpoint.
Split Centre	No issues.

<b>Site 497 Adjacent to Trefigin Quarry</b>	
<b>VP2</b>	<b>View (<i>Distance 0.48km looking Northeast</i>)</b>
Baseline Description	The viewpoint is on the public footpath running across agricultural fields and a short distance from the southern edge of the existing Trefigin Quarry. It is rural in feel with the industrial backdrop of the working sand and gravel quarry. The view to the northeast is predominantly rural and rises slightly. Mature trees partially obscure the view.
Predicted change	The extension of the quarry would undoubtedly change the view from agricultural to industrial use. However, this would be in the context of the existing quarry use.
Magnitude of Change	Potentially medium to large: The development would result in a noticeable change in the existing view and would form prominent elements in an otherwise rural landscape, although the extension would be comparable to the existing quarry.
Type of Effect	The development would result in a significant change albeit in the context of the existing quarry.
<i>Significance of Effect</i>	Given that the proposed development would be viewed in context of the existing quarry, with suitable mitigation through landscaping and consideration of hours of operation, adverse effects from this viewpoint could be mitigated.
Split Centre	No issues.

<b>Site 497 Adjacent to Trefigin Quarry</b>	
<b>VP3</b>	<b>View (<i>Distance 0.64km looking Northeast</i>)</b>
Baseline Description	The viewpoint is on the public footpath adjacent to the property known as Trefigin Lodge and a short distance from the southern edge of the existing Trefigin Quarry. It is rural in feel with the industrial backdrop of the working sand and gravel quarry. The view to the northeast is predominantly rural and rises slightly. Mature trees partially obscure the view.
Predicted change	The extension of the quarry would undoubtedly change the view from agricultural to industrial use. However, this would be in the context of the existing quarry use.
Magnitude of Change	Potentially medium to large: The development would result in a noticeable change in the existing view and would form prominent elements in an otherwise rural landscape, although the extension would be comparable to the existing quarry.
Type of Effect	The development would result in a significant change albeit in the context of the existing quarry.
<i>Significance of Effect</i>	Given that the proposed development would be viewed in context of the existing quarry, with suitable mitigation through landscaping and consideration of hours of operation, adverse effects from this viewpoint could be mitigated.
Split Centre	No issues.