

**Pembrokeshire County Council  
Pembrokeshire Coast National Park Authority**

**Pembrokeshire Coast National Park Authority LDP Examination**

**Statement of Common Ground**

**March 2010**

To assist the Planning Inspector appointed to examine the soundness of the PCNPA LDP, Pembrokeshire County Council and Pembrokeshire Coast National Park Authority officers have prepared a 'Statement of Common Ground' that summarises the alignment of the Local Development Plan (LDP) strategic policy for PCNPA with that proposed for PCC.

In August 2008 the PCC and PCNPA published a joint 'Statement of Strategic Principles' to Guide development of the individual LDPs<sup>1</sup>.

This statement confirmed the support of both authorities for the vision and objectives of the Wales Spatial Plan 2008 Update as they relate to Pembrokeshire – The Haven.

In response to a request by Welsh Assembly Government officials, the Council's Cabinet has agreed an 'Interim Planning Policy Statement' which sets out the basis for the Deposit Local Development Plan. This was agreed by the Cabinet, subject to reference back for further consideration of the detailed proposals relating to housing provision in the smaller villages and hamlets.

This Statement of Common Ground relies on the submitted PCNPA LDP and, for PCC on the Interim Planning Policy Statement considered by its Cabinet on March 8<sup>th</sup> 2010. Both documents are referred to in the following paragraphs as 'plans'.

The statement builds on the principle of joint working established when preparing the existing Development Plan - JUDP.

The statement sets out the consistency of approach in embedding the Wales Spatial Plan in relation to agreement on climate change, population forecasting and household projections, economic development, retail, minerals, renewable energy, environment and culture.

Taken overall, the approach taken by PCC is likely to be compatible with the PCNPA spatial strategy.

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<sup>1</sup> August 2008

## **Broad Levels of Growth, Settlement Hierarchy, Split Settlements**

### **Population Projections**

PCC and PCNPA are in broad agreement on the anticipated scale and distribution of growth.

Two recent, methodologically sound, population and household projections have been prepared for the county of Pembrokeshire, one by the Welsh Assembly Government (the 'WAG projection' ) and the other by Pembrokeshire County Council (the 'PCC projection'). The two projections use the same projection method the PopGroup / HouseGroup projection software<sup>2</sup> but differ in the way that the assumptions for fertility, mortality and migration rates are calculated, and their population bases (the WAG projection uses the Office for National Statistics (ONS) 2006 mid-year estimate, the PCC projection uses the 2001 Census). The WAG projection only considers the complete area of the county, while the PCC projection considers the complete county and the two Local Planning Authority areas (the National Park and the area of the county outside the National Park) using the same method for all areas. More recently WAG has published disaggregation of the population forecast, with an underpinning common assumption of performance for the resultant separate populations. No disaggregated household forecast has been issued by WAG.

Pembrokeshire County Council and the Pembrokeshire Coast National Park Authority share the view that the PCC projection is the best projection to inform both their LDPs because it is the only projection that provides separate, methodologically robust population and household projections for the two Planning Authority areas.

The overall spatial strategy for the PCNP is broadly compatible with that proposed for PCC. The strategic spatial strategy chosen by both authorities is primarily based on the Key Settlement Framework for the Spatial Plan along with some additional lower tiers and promotes the Hub concept identified in the Wales Spatial Plan 2008 Update. The identification of the specific centres (for PCC, in principle) and the level of growth identified for the size of the Centre would appear to be compatible, each plan with the other. This is particularly pertinent in what are termed 'split centres' ie those centres that straddle the boundary of the PCC/ PCNPA planning jurisdictions.

### **Affordable housing,**

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, with a shared recognition that the methodology / defined need in the Local Housing Market Assessment was flawed. As an alternative both authorities have drawn on the common housing register to demonstrate the scale of local need for affordable housing. Both plans aim to address newly arising need

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<sup>2</sup> the PopGroup/ HouseGroup projection software

and seek to contribute to the historic legacy of need. There is an agreed approach to affordable housing delivery, in line with the interim policy approach identified in the joint publication the Pembrokeshire Affordable Housing Delivery Statement 2009. Both policy approaches rely on Development Appraisal / Viability testing using the Three Dragons Development Appraisal Toolkit, although it is noted that there are differences in the resulting thresholds / quotas.

## **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 sustainable.

Both plans demonstrate a shared understanding of the importance of developing economic opportunities associated with climate change and green technology.

## **Economy**

Both plans include policies to deliver in relation to the Wales Spatial Plan - the Haven priority of 'developing the (three) strategic hubs ..... the renewal of town centres, the development of complementary settlement roles within and between hubs, strengthening community, economic and social outreach and spreading benefit and growth to the wider hinterlands and smaller rural communities'.

Both plans propose mixed use developments and live work units.

## **Visitor Economy**

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. Recognition is given by both Authorities to the attraction of the natural environment and the need for its protection. Between them the Plan strategies allow for a range of visitor accommodation. Additional caravan provision is restricted within the Park and those parts of the County where there are already significant number of sites. Self-catering accommodation is permitted within centres in both areas, however in the National Park priority is given to the need to provide for affordable housing where a need has been identified. Sites well-related to centres outside the National Park may also be acceptable. The National Park Authority seeks to protect serviced visitor accommodation from unnecessary loss and this is complemented by the County Council's approach to permit such developments in or well-related to centres, or through conversion of appropriate buildings.

Visitor attractions are permitted within centres in both Plan areas and in countryside areas where evidence of the need for that location is provided.

The County Council also propose to permit development of sites adjoining or close to main communication routes.

The Visitor Economy strategies have minor differences but there is overall compatibility with both aiming to meet the overall objective to sustain the visitor economy in Pembrokeshire.

### **Agriculture and Rural Diversification**

Both plans recognise the importance of agriculture and agricultural support industries to Pembrokeshire and the need to support appropriate rural diversification.

### **Retail**

Both PCNPA and PCC's strategy focus on the need to maintain / create vibrant and diverse town, district and local centres. PCC has yet to detail specific allocation locations, the compatibility with the Community Plan rests on 'Appropriate allocations identified within the towns'.

PCC's strategic policies indicate that there will be allocations at the Havens Hub and Fishguard and Goodwick Hub. Elsewhere, Narberth's niche role is recognised. There is no policy allocating away from town and local centres, ie out-of-town locations, although a criteria based approach is included. Policy GN13 (page 51) indicates that allocations for retail development will form part of the plan approach.

The retail hierarchy is compatible, the strategic approach and allocation emphasis is also compatible, subject to details of scale and location.

### **Minerals**

The National Park Authorities in Wales are not required to maintain landbanks for hard rock or sand and gravel<sup>3</sup>. They are only expected to contribute to aggregate mineral supply under exceptional circumstances. The National Park LDP does not propose landbanks for sand and gravel or hard rock.

An 'in principle' agreement has been reached between Pembrokeshire County Council and the Pembrokeshire Coast National Park Authority which would allow the County to take account of permitted reserves within the National Park so that a Pembrokeshire wide reserve can be used for the Pembrokeshire County Council LDP landbank.

The Interim Planning Policy Statement acknowledges the policy direction of moving mineral working outside the National Park, and that this will form a part of the review of the PCC plan.

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<sup>3</sup> Welsh Assembly Government MTAN 1 Aggregates 2004

## **Renewables**

Both Plans seek the delivery of renewable energy developments, which are considered to be a key area of development in the Wales Spatial Plan. This includes identifying opportunities to develop the potential of tidal and wave power and recognising the need for adequate landfall provision for existing and proposed marine renewable projects.

## **Environment & Culture**

Both Plans seek to ensure that the county's natural and historic environment and landscape will be protected from inappropriate development and, where possible, enhanced. 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. 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.

## **Waste**

The overall thrust of the policies in each plan is compatible with the Regional Waste Plan 1<sup>st</sup> review, whilst noting that the PCC Interim Planning Policy Statement is without specific allocations at this stage.

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**March 30<sup>th</sup> 2010**