
Statement of Common Ground Number 4

1. Issued on behalf of Pembrokeshire Coast National Park Authority and Pembrokeshire County Council, in respect of Soundness Test 2 for the Examination: 'Is it (the Plan compatible with the plans of neighbouring authorities?)'
2. This statement of common ground focuses on areas of spatial and strategic policy where compatibility has been achieved (Pembrokeshire Coast National Park Local Development Plan 2 (at Submission) and the draft Preferred Strategy of Pembrokeshire County Council's Replacement Local Development Plan 2 (LDP2).

Examination Pembrokeshire Coast National Park Local Development Plan 2



**Pembrokeshire Coast
National Park Authority**



Pembrokeshire County Council

Why was this Statement of Common Ground prepared?

3. The Local Development Plan Manual August 2015 advises that the purpose of a Statement of Common Ground is to establish the main areas of agreement between two or more parties on a particular issue.

4. The statement covers the following strategic planning issues:
 - Spatial Strategy(in part)
 - Housing Growth(in part)
 - Housing Distribution
 - Gypsy Travellers and Showpeople is covered by a separate Statement of Common Ground
 - Employment (in part)
 - Renewable Energy
 - Visitor Economy
 - Minerals Development is covered by a separate Statement of Common Ground
 - Waste
 - Retail

Text of Agreement

5. To assist the Planning Inspector appointed to examine the soundness of the Pembrokeshire Coast National Park Local Development Plan 2 (with focussed changes), 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 the Pembrokeshire Coast National Park Local Development Plan 2(with focussed changes) with the Preferred Strategy¹ proposed for Pembrokeshire County Council's Replacement Local Development Plan.

6. **Spatial Strategy:** This statement confirms that both authorities continue to take account of the vision and objectives of the Wales Spatial Plan 2008 Update as they relate to Pembrokeshire – The Haven. This spatial approach continues to be reflected in both Plans at the higher levels of the spatial strategy. The Wales Spatial Plan Update 2008 identifies the importance of developing the Area's three strategic Hubs, two of which (the Haven Hub and the Fishguard and Goodwick Hub) are located within Pembrokeshire. The intention is that a significant proportion of residential development will be directed to the Main Towns and the Rural Town during Pembrokeshire County Council's Plan period. In the Deposit Plan land will be allocated for development for employment and other land uses in most Main Towns, to support their continued role as centres of economic, social and cultural activity.

7. Lower order roles are also comparable as shown in the Table below:

¹ Pembrokeshire County Council, Cabinet 3rd December 2018 Draft.

Policy ² Pembrokeshire County Council Pembrokeshire Coast National Park	Haven Towns	North Pembrokeshire Towns	Rural Towns/Tenby [#]	Service Centres/ St David's, Saundersfoot, Newport, Crymmych	Service Villages/ Rural Centres [✘]	Local Villages(including Cluster Villages/ Rural Centres [✘]
Housing Allocations	✓	✓	✓	✓	✓	
Housing Allocations	N/A	N/A	✓	✓	✓	
Windfall market housing	✓	✓	✓	✓	✓	✓
Windfall market housing	N/A	N/A	✓	✓	✓	✓
Local need affordable housing	✓	✓	✓	✓	✓	✓
Local need affordable housing	N/A	N/A	✓	✓	✓	✓
Exception sites for affordable housing	✓	✓	✓	✓	✓	✓
Exception sites for affordable housing	N/A	N/A	✓	✓	✓	✓
Employment Allocations	✓	✓	✓	✓	✓	
Employment Allocations ^{**}	N/A	N/A	✓	✓	✓	
Employment sites through criteria-based policies	✓	✓	✓	✓	✓	✓
Employment sites through criteria-based policies	N/A	N/A	✓	✓	✓	✓
Community facilities – within or well-related to settlements	✓	✓	✓	✓	✓	✓
Community facilities – within or well-related to settlements	N/A	N/A	✓	✓	✓	✓

8. **Rural Towns/Tenby:** The National Park Authority sought through the candidate site process to identify sites for housing in Tenby but the view of the National Park Authority is that no deliverable sites could be identified.

Please note as an area of disagreement Representation 2708/7

advises: 'new development has been predominantly directed to communities with sufficient services and amenities and linked by a convenient, low-impact and affordable public transport network'. However, Tenby has no housing allocations, in spite of being the NP settlement that is likely to score highest in terms of the services, amenities and public transport.

² 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.

9. **✘ Service Villages/Rural Centres:** Some Rural Centres in the Pembrokeshire Coast National Park are listed in the Service Centres: 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 'complete' inset plan settlement boundary for Centre.
10. **✘ Local Villages/Rural Centres:** Those local villages that are also listed as Rural Centres in the Pembrokeshire Coast National Park Local Development Plan do not have allocations.
11. **** Employment Allocations in the Pembrokeshire Coast National Park:** The National Park Authority sought through the candidate site process to identify sites but the view of the National Park Authority is that no deliverable sites could be identified.

Please note as an area of disagreement Representation 2708/73 by Pembrokeshire County Council advises: *There is a need for employment provision through allocations in PCNPA area to ensure economic growth and support local communities.*

Please note as an area of support Representation 2708/30 by Pembrokeshire County Council advise: *Policy 6 Rural Centres (Tier 4) (Strategy Policy) We support the identification of the following centres as Rural Centres - Carew, Milton, Cosheston, New Hedges, Hook, Houghton, Roch, Lamphey, and Llangwm. All of these settlements are currently identified as Service Villages in PCC's LDP, which enables a similar policy approach to be followed as that proposed for Rural Centres by PCNPA. Square and Compass is currently a lower order settlement in the PCC LDP, however an initial review of facilities as part of PCCs LDP Review suggests that this settlement may move up any proposed settlement hierarchy as part of PCCs LDP 2. There is therefore a conformity of approach in relation to these cross-boundary settlements.*

12. **Infill and Rounding Off:** The Plans each have a nuanced approach developed for such proposals. Both Plans include opportunities for 'infilling' outside Centres. The Pembrokeshire Coast National Park Local Development Plan also refers to rounding off. Both Plans refer to '1 or 2 dwellings'. The County Council's approach is

to consider market and affordable housing contributions in groups of 20 dwellings or more (50% affordable housing provision) with just affordable being considered in smaller sized groups. The National Park Authority's definition refers to paragraph 4.46 and 4.47 of Planning Policy Wales Edition 9. The National Park Authority's approach refers to seeking to prioritise affordable housing delivery before market housing is considered in accessible locations (Policy 7a)). Both Plan's refer to infilling as a small gap in an otherwise built up frontage.

Employment

13. The Spatial Strategy sets out where there is consistency of approach on where employment undertakings can take place in the County. The County Council and the National Park Authority are stakeholders in the preparation of a Regional Strategic Economic study currently being produced with a final report anticipated in 2019. This study and consideration of Candidate Sites will inform the allocation of strategic sites within the Deposit Plan for Pembrokeshire County Council and which will be identified in the Strategic Employment Policy. Any issues arising for the National Park Authority would need to be considered in a future review of the Plan.
14. Taken overall, the approach taken by PCC is likely to be compatible with the PCNPA spatial strategy.

Housing Growth

15. 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 (in line 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.

Housing Distribution

16. Both Plans provide for an emphasis on allocations in the larger centres with a 60/40% split between larger Centres and the Rural Centres/Villages. (please also see Spatial Strategy above regarding provision in Tenby).

Affordable housing

17. 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 2014. Both authorities are also party to a joint commission with neighbouring authorities for the preparation of a replacement Housing Market Assessment – due for delivery in 2019.
18. Both plans aim to address newly arising need and seek to contribute to the historic legacy of need. The authorities liaise directly and through the Pembrokeshire Affordable Housing Group regarding affordable housing delivery. The authorities also intend to prepare a joint affordable housing supplementary planning guidance to replace currently adopted supplementary planning guidance.

Please note as an area of disagreement Representation 2708/166 by Pembrokeshire County Council advises: *PCC notes that the affordable housing percentages set out in Policy 49 are higher than for the PCC Plan area, including for split settlements. Whilst we recognise that house prices are frequently higher in the National Park, particularly in locations with sea views, the disparity in targets for some settlements and areas appears significant. In the case of Crymych, PCC's LDP has a target of 0-5%, whereas the PCNPA plan is proposing a 20% target for Crymych and the North East settlements. We understand that the targets have been based on the viability assessment undertaken but consider that it may be worth exploring in detail why there is such a difference. Having looked at the viability assessment, PCC consider that the following elements may require consideration: whether the cost of sprinklers is realistic – a figure of £1750 is used, our recent experience of local sites indicates a cost of £4k is more realistic; whether land values identified are perhaps too high in the case of Tenby and Crymych and the wider North Area; whether the Build Costs used pick up on the fact that smaller sites often cost more to deliver and builders working in the national park are less likely to have the same economies of scale as national housebuilders and whether some element of exceptional cost should be factored into the viability assessment. One potential result of Brexit may be to create a shortage of skilled labour, with potential implications for build costs.*

Climate Change

19. 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.

Please note as an area of support 2708/93 - Pembrokeshire County Council advises *Chapter 4C Climate Change etc. Flooding and Coastal Inundation Policy 36 Development in the Coastal Change Management Area* Support the restrictive approach towards new dwellings in the Coastal Change Management Area, the evidence for which has been discussed and developed in conjunction with PCC.

Visitor Economy

20. 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 will allow for a range of visitor accommodation.

Please note as an area of support 2708/104 - Pembrokeshire County Council advises *Chapter 4D Visitor Economy etc. Caravan, Camping and Chalet Development* Support the use of a capacity study to inform such policies & the clarity of the different approached to different structures.

Agriculture and Rural Diversification

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

Please note as an area of support Pembrokeshire County Council advises *Chapter 4D Visitor Economy etc. 2708/115 Policy 46 Farm Diversification - Support this positive approach to farm diversification*

Retail

22. Both Authorities' strategies focus on the need to maintain / create vibrant and diverse town, district and local centres. Both Plan's retail hierarchies are compatible and based on the findings of the South West Wales Regional Retail Study (February

2017) which was commissioned jointly with Ceredigion County Council.

Renewables

23. Both Plans seek the delivery of appropriate renewable energy developments, which are considered to be a key area of development for West Wales. This includes recognising opportunities to develop the potential of tidal and wave power and addressing the need for adequate landfall provision for existing and proposed marine renewable projects. Both authorities implement joint guidance on assessing the Cumulative Impact of Wind Turbines. Both authorities carry out joint monitoring of provision annually.

Environment & Culture

24. 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.

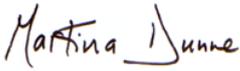
Waste

25. The overall thrust of each strategy is compatible with national policy. 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 the County Council has waste management responsibility for the whole County.

Community Facilities and Infrastructure

26. Both authorities have adopted joint supplementary planning guidance on Planning Obligations under the current Local Development Plan and intend to prepare joint supplementary planning guidance for the replacement Local Development Plans.

Area of agreement: Representation 2708/255 - Pembrokeshire County Council advises *Chapter 4F Community Facilities Policy 53 Community Facilities and Infrastructure Support the general approach to maintaining and improving provision.*

<p>Signed: :</p>  <p>Martina Dunne Head of Park Direction Pembrokeshire Coast National Park Authority</p>	<p>Signed: <i>S L Morris</i></p> <p>Sara Morris Development Plans and Conservation Manager Pembrokeshire County Council</p>
<p>Date 4th December 2018</p>	<p>Date 4th December 2018</p>
<p>Statement of Common Ground date logged in the Comments Schedule for Submission for Examination Yes/No</p>	