



## Local Development Plan 2 (2017 – 2033)

Public written feedback on Strategic  
Housing Options Informal Consultation

16<sup>th</sup> July – 10<sup>th</sup> September 2018

## Abbreviations

JUDP	Joint Unitary Development Plan for Pembrokeshire 2000-2016
LDP / LDP (2)	Local Development Plan / Local Development Plan (2)
LPA	Local Planning Authority
PCC	Pembrokeshire County Council
WG	Welsh Government

## Glossary of Terms

Adopted	The Local Development Plan is adopted when the Authority's Council Meeting decides it will be the Development Plan for the County and replace the existing Development Plan.
Affordable Housing	Residential development for sale or rent below market prices and retained as affordable in perpetuity
Affordable Housing Allocation	Land allocated for affordable housing either low cost home ownership or to rent.
Availability and Deliverability of Land	Available land includes a landowner willing to develop or sell for development. Deliverability relates to the economic viability of bringing a site forward
Countryside	Land outside of settlements identified within the Settlement Hierarchy
Deposit Plan	A full draft of the Plan which is available for public consultation during the Deposit Period.
Housing Allocation	Residential development sites for a minimum of 5 units and shown within the Development Plan
Infrastructure	Infrastructure encompasses power supplies, water supply, means of sewage or surface water disposal, roads and other transportation networks, telecommunications and facilities that are required as a framework for development.
Market Housing	Housing for sale at market prices (can include self-build or custom build housing).
Infill and rounding off	This is when housing development takes place in a location where there is no settlement boundary. In such locations new housing may be permitted where it is between existing gaps of properties 'infill' or where it is 'rounding off' an edge of a settlement.
'Planning by Appeal'	Ad hoc development proposals which come forward in the absence of a development strategy to guide development
Preferred Option	The single option or hybrid option resulting from the consideration of a range of options or issues following consultation.

Preferred Strategy	The first formal strategy document for the review of the LDP which sets out the framework and overarching policies that will guide the policies and proposals relating to land use.
Review Report	Sets out what in the LDP needs to change and why.
Settlement Boundary	A settlement boundary is a planning tool which involves a theoretical line drawn on a map to identify the boundary to a settlement. Typically housing development is only permitted within this boundary and areas outside it are considered to be countryside.
Settlement Hierarchy	Settlements are classified within the hierarchy according to the population and level of services within the settlement. Some very small settlements with very limited or no services will fall outside the hierarchy and are defined as countryside.
Self build/custom build housing	Bespoke housing development commissioned and managed by the intended occupier. In all cases whether a home is self-build or custom build, the initial owner of the home will have primary input into its final design and layout.

## Contents

Abbreviations .....	2
Glossary of Terms.....	2
<b>Introduction</b> .....	5
<i>Local Development Plan Review</i> .....	5
<i>Strategic Options Consultation</i> .....	5
<i>Next steps</i> .....	5
Table 1: Feedback from Informal Public Consultation on Strategic Housing Options (July-September 2018) .....	6

## Introduction

### *Local Development Plan Review*

Pembrokeshire County Council is preparing a replacement Local Development Plan (LDP) – **Local Development Plan 2**. When adopted, it will provide a revised and updated policy framework to guide development outside of the National Park and inform planning decisions taken by the County Council. During the **Review**, the existing Local Development Plan (up to 2021) will remain in place until Local Development Plan 2 (LDP2) is adopted.

### *Strategic Options Consultation*

During the period between 16<sup>th</sup> July and 10<sup>th</sup> September 2018, Pembrokeshire County Council ran an informal public consultation on **Strategic Options** for the LDP 2. As part of this consultation, two papers were published, one on **Draft Issues, Vision and Objectives** and one on **Strategic Housing Options**. **The second paper Strategic Housing Options set out** various scenarios for future levels of housing growth and broad locations/policy options to consider for accommodating this growth. Both documents were made available on the Council website and in libraries and contact centres. All of those who had registered an interest in the LDP were informed of the informal consultation.

A summary of **Informal Public Consultation on LDP 2 Strategic Options** which sets out the written responses received to the consultation is set out in **Table 1** below.

### *Next steps*

The feedback received through the informal written consultation and in the workshops with Stakeholders, Members and Town and Community Councils will be considered and taken forward in the development of the LDP 2 **Preferred Strategy**. Pembrokeshire County Council anticipates publishing its **Preferred Strategy** for formal public consultation in December 2018.

Table 1: Feedback from Informal Public Consultation on Strategic Housing Options (July-September 2018)

<b>Growth Options</b>	
<p><b>Option 1 – 196 dwellings a year</b>  <b>Option 2 – 340 dwellings a year</b>  <b>Option 3 – 408 dwellings a year</b>  <b>Option 4 – 443 dwellings a year</b>  <b>Option 5 – 416 dwellings a year</b>  <b>Option 6 – 572 dwellings a year</b></p>	
<b>Q1: Do you support one of the Proposed Growth Options? (If so, please specify which one)</b>	
<b>Representor</b>	<b>Summary</b>
DCWW	No comment on these options – support guiding growth to locations with sewerage capacity.
HBF	The HBF are currently unable to support any one growth option but would not support a growth option that proposes less homes that are currently being built annually as a number of the options suggest.
National Grid	No comments
Belton & Son Ltd	Support is provided for Growth Option 6
ATEB	Support is provided for Growth Option 6
Maesgwynne Properties Ltd	Support for Growth Option 6
Guy Thomas	Support is provided for Growth Option 6
Jim Chesters	Support is provided for Growth Option 1
Camrose Community Council	Support is provided for Growth Option 6
Cllr D Burrell (personal capacity)	Support growth option 3, 4, 5 or 6, as this allows flexibility should there be greater demand than predicted in the lower growth scenarios. Although there is a risk that this could result in unnecessary environmental impacts should more housing be built than required, in theory it would seem to my unexperienced mind that this wouldn't happen as builders will only build housing that they think there is a demand for.
Jason Evans	No Comment

Nolton and Roch Community Council	Yes- Nolton and Roch Community Council support any proposal to build a little more houses than may be forecast and at least at the same level as the previous LDP, in order to ensure we safeguard the housing needs and ensure the development of the economy.
Mathry Community Council	No comment
Angela Lebovic	Support is provided for Growth Option 4.
<p>Conclusions:</p> <p>One representor supported Option 1, but the majority of written respondents supported higher levels of growth, with 5 out of the 14 respondents who answered this question supporting Growth Option 6 (the highest growth option). The HBF noted that they would not support a growth option that proposes less homes than are currently being built. Others supported Options that included recent build rates (Option 4).</p>	
<p><b>Q2. Would you like to propose a different Growth Option?</b></p>	
DCWW	None proposed
HBF	A more economic growth based / aspirational scenarios
Belton & Son Ltd	No
ATEB	No
Maesgwynne Properties Ltd	No
Guy Thomas	No
Jim Chesters	No
Camrose Community Council	No
Cllr D Burrell (personal capacity)	Would like to see specific housing allocations for affordable housing. It seems that the biggest demand in Pembrokeshire is for affordable housing (waiting list of 2179) so can the LDP focus house builders on meeting this target?
Jason Evans	No Comment
Nolton and Roch Community Council	No

Mathry Community Council	No
Angela Lebovic	No
<p>Conclusions:</p> <p>HBF have asked for a more economic growth based/aspirational scenario to be considered. One respondent has asked for specific housing allocations for affordable housing. This is a detailed aspect of delivering an overall housing requirement, but is a specific approach that the LPA will explore further, prior to the development of a Deposit Plan.</p>	
<p><b>Q3. Do you agree with the outcome of the Sustainability Appraisal?</b></p>	
DCWW	No comment
HBF	Yes
Belton & Son Ltd	No. The Sustainability Appraisal has incorrectly assessed a number of Sustainability Appraisal (SA) Objectives in respect of Growth Option 6. Notwithstanding this and in any case, it should be noted that Growth Option 6 would improve the economic, social, environmental and cultural well-being of Wales, in accordance with the sustainable development principle, under section 3 of the Well-Being of Future Generations (Wales) Act 2015 (WBFG Act), and would be in accordance with the sustainable development principle through its contribution towards one or more of the Welsh Ministers' well-being objectives set out as required by section 8 of the WBFG Act.
ATEB	No – we consider that the Sustainability Appraisal has incorrectly assessed a number of Sustainability Appraisal (SA) Objectives in respect of Growth Option 6. Notwithstanding this and in any case, it should be noted that Growth Option 6 would improve the economic, social, environmental and cultural well-being of Wales, in accordance with the sustainable development principle, under section 3 of the Well-Being of Future Generations (Wales) Act 2015 (WBFG Act), and would be in accordance with the sustainable development principle through its contribution towards one or more of the Welsh Ministers' well-being objectives set out as required by section 8 of the WBFG Act.
Maesgwynne Properties Ltd	No
Guy Thomas	No comment
Jim Chesters	Yes. Particularly note Option 1 proved most positive



Camrose Community Council	Not entirely, as a Community Council Camrose is committed to support an option to allow our villages and settlements to grow appropriately to be self-supportive, interactive and thriving with an ability to raise and support families and services.
Cllr D Burrell (personal capacity)	Yes
Jason Evans	No Comment
Nolton and Roch Community Council	The appraisal seems only to be at a high level, whereas the detail can change any output- obviously careful consideration of sites and the communities chosen for these developments will ensure that the environment etc is safeguarded as much as possible.
Mathry Community Council	Yes
Angela Lebovic	Yes
<p>Conclusions:</p> <p>Note the comments from those proposing higher levels of growth that the SA has incorrectly assessed the SA objectives in relation to this Option. The SA is an iterative piece of work which will be revised alongside the policies and detailed proposals within the Preferred Strategy. In relation to the assessment undertaken to date, the Council consider that Option 6 was correctly assessed against the relevant SA objectives.</p>	
<b>Spatial Options</b>	
<b>Q4. Do you support one of the Proposed Spatial Options? (1,2, or 3)</b>	
HBF	Option 2
Belton & Sons Ltd	No - We do not support either Options 1, 2 or 3 given that they do not propose any positive allocation of housing land within rural settlements.
<b>ATEB</b>	Option 2
Maesgwynne Properties Ltd	Option 2
Guy Thomas	Support for a combination of options 2 & 3 to enable PCC to use a flexible judgement appropriate to the settlements

Jim Chesters	Yes Option 1
Camrose Community Council	Yes Option 3
Cllr D Burrell (personal capacity)	Support Option 2 that directs 40% of growth towards rural settlements. Although this scores slightly worse than option one on the sustainability appraisal, I think it is important that these communities are supported by ensuring that there is sufficient demand to sustain services and/or create additional services. The likely provision of additional services within rural communities as a result should help to offset the requirement to travel further to services centres, particular if cycling routes to services centres continue to be improved and the local authority continue to invest in public transport services.
Jason Evans	Support for Spatial Option 2 (Service Based Focus). Unfortunately, it has become apparent over a number of years now that the level of interest from national housebuilders in Pembrokeshire has waned significantly, which has had a clear impact on its level of housing growth. However, local and regional builders continue to be buoyant in their activity in the County and show signs of continued success. As a result, the growth strategy of the replacement LDP with regards to housing should be reactive to this demand through the allocation of a greater number of medium sized allocations (5-50) at the identified Service Centres and Service Villages to secure a sustainable, but more importantly deliverable level of housing growth in the coming years. The suggested 60%/40% split of growth is therefore supported.
Martin Bell	Option 1
Nolton and Roch Community Council	Support any option that ensure that the rural communities of Pembrokeshire can thrive just as well as the towns. Crucial to get the right balance- that may be a fair 50/50 split for town and rural housing investment.
Mathry Community Council	Option 3
Angela Lebovic	Option 3
<p>Conclusions:</p> <p>A mixed range of views were received in response to this question. Of the 13 respondents, 2 supported Option 1, 5 supported Option 2, 3 supported Option 3, one supported a combination of options 2 and 3 and 2 did not support any options specifically.</p>	
<p><b>Q5. Would you like to propose a different Spatial Option?</b></p>	

HBF	No
Belton & Sons Ltd	Yes. We accordingly supportive of the 60/40% split and would suggest that this continues to be utilised within LDP2. We also support the approach to provide a mix of housing allocation sizes with the overall amount of housing identified being proportionate in scale to the size and level of services existing within the settlement. However, we do not support the approach to not positively allocating any housing land within settlements defined as Local Villages within the LDP2 Hierarchy of Settlements.
ATEB	No
Maesgwynne Properties Ltd	No
Guy Thomas	No comment
Jim Chesters	We would propose that local villages be included in growth to a measured extent in Option 1 to ensure a balanced growth whilst centring on Urban predominance.
Camrose Community Council	No
ClIr D Burrell (personal capacity)	No
Jason Evans	No
Mathry Community Council	No
Angela Lebovic	Yes – Option 3.
<p>Conclusions:</p> <p>Comments suggest that housing growth/ allocations should be included in Local Villages.</p>	
<p><b>Q6. Do you agree with the outcome of the Sustainability Appraisal?</b></p>	
HBF	Yes
Belton & Sons Ltd	No. The summary suggests that Option 1 is better than Option 2 because there are fewer uncertain effects. However, both Options 1, 2 and 3 score the same number of uncertain effects in the Sustainability Appraisal. Furthermore, Option 2 scores only one more negative effect than Option 1. Based on Barton Willmore’s SA, Option 2 would have two less negative effects than Option 1 and would therefore be the most sustainable Strategic Option in our opinion.

ATEB	No. we consider that the SA has incorrectly assessed a number of SA Objectives in respect of Strategic Option 2
Maesgwynne Properties Ltd	No
Jim Chesters	Yes
Camrose Community Council	In part, there is accuracy in the SA however, it does not reflect that people will always make choices and these will be based on a variety of individual circumstances. All 3 options discriminate against rural communities
Cllr D Burrell (personal c	Yes
Jason Evans	No Comment
Mathry Community Council	Yes
Angela Lebovic	Yes
<p>Conclusions:</p> <p>Note the comments from those proposing a 60/40 split that the SA has incorrectly assessed the SA objectives in relation to this Option. The SA is an iterative piece of work which will be revised alongside the policies and detailed proposals within the Preferred Strategy. In relation to the assessment undertaken to date, the Council consider that the 60/40 option was correctly assessed against the relevant SA objectives.</p>	
<p><b>Q7. Do you support any of the Rural Housing Strategy Options?</b></p>	
Belton & Sons Ltd	We support a combination of Settlement Cluster Option A (which recognises that groups of settlements can be used to identify sustainable locations for development) and Settlement Option D (which states that market housing can be 'allocated' in rural settlements).
Jim Chesters	Yes, Option B, C, E and H.
Camrose CC	Yes very supportive of clusters. Support for Option A and C, broadly supportive of the use of boundaries for all settlements. Infill and rounding off is supported. Wish to see every settlement have a boundary. Support for option E if its applied across the board. Support for Option G in terms of sustainable market housing
Cllr D Burrell (personal capacity)	Support for Option A – the use and consideration of settlement clusters Option C – settlement boundaries for all local villages

	<p>In don't support option E or F because I believe there should be restrictions on infill (see below). Rounding off would appear to be sensible to me at all locations, and could be allowed outside of settlement boundaries. I don't support Option H because local villages with few services would be difficult places for people without a car to live, and the numbers of people without cars in affordable housing is likely to be proportionally higher.</p> <p>I support Option G – allowing small scale market housing in local villages (sites of less than 5 units) BUT I think any commuted sums from development in these 'unsustainable' areas should be used to counteract their sustainability impacts e.g. by improving walking and cycling routes, or public transport in areas where they are more feasible means of regular transport.</p>
Jason Evans	No Comment give clarity both to potential applicants and to those who have already bought a property - ie that they can rely on their investment decisions. Having a clear boundary will also help infrastructure providers with their forecasts.
Martin Bell	Support for Settlement boundaries as they give clarity both to potential applicants and to those who have already bought a property - ie that they can rely on their investment decisions. Having a clear boundary will also help infrastructure providers with their forecasts. The current policy of no-infill and no extensions to existing settlements without a settlement boundary should be maintained, again on the basis of giving clarity both to those in existing properties and those hoping for new development in the open countryside. The proposal for "clusters" needs to be carefully examined to be sure that the provision of different services in adjacent villages is a practical answer and where access by pavements / cycleways would really yield a sustainable solution.
Mathry Community Council	Option A, C, E, G and H.
Angela Lebovic	Yes
Stephen George	<p><b>The current Policy of 100 % affordable in some Villages</b> - such as Pelcomb has had the effect that it is not financially viable to build in the village due to the current plan dictating any new development can only be social housing.</p> <p>This policy decision discriminates against any one in a position to obtain a mortgage or to to build, or for those who wish to build as part of their legitimate business it also then prevents others who wish to buy their home and live in this village.</p> <p>This has had the unintended consequence of no new development in this settlement since this decision was made. Furthermore this will push up the prices of houses in such villages and puts at an advantage those who already live in the village. It will push the prices up and put it out of the financial reach of others. This is discriminatory against the</p>

	working professional families and against business. There is already social houses in this village – how many more does the LA want/need
Gill George	<p>The current Policy of 100 % affordable in some Villages - such as Pelcomb has had the effect that it is not financially viable to build in the village due to the current plan dictating any new development can only be social housing.</p> <p>This policy decision discriminates against anyone in a position to obtain a mortgage to build, or for those who wish to build as part of their legitimate business. This Policy also now prevents others who wish to buy their own home and live in this village.</p> <p>This has had the unintended consequence of no new development in this settlement since this decision was made. What is the point of this when more homes overall are required in Pembrokeshire? Totally illogical.</p> <p>This is discriminatory especially against the working professional families and particularly against builders who are trying to carry on in business in uncertain, tough financial and housing climates.</p> <p>In Pelcomb for example there is already a significant number of LA houses in this village – how many more does the LA want/need? Has this been assessed and properly considered?</p> <p>Furthermore current Policy of social houses only will push up the prices of existing houses in such villages thus creating an advantage to those who already live in such villages. It will push the prices up and potentially put homes out of the financial reach of local people who wish to buy in their local/home village.</p>
<p>Conclusions:</p> <p>Settlement clusters (Option A) as an approach was supported by 4 respondents. One respondent specifically did not support settlement clusters (Option B).</p> <p>Settlement Boundaries for all locations in the hierarchy (Option C) was supported by 4/5 respondents. Options for infill and rounding off were also supported by some respondents, with others noting that there should be restrictions on infill in unsustainable locations.</p> <p>Mixed views were expressed on the type of housing that should be provided at the lowest levels of the hierarchy, with some respondents supporting affordable housing only and others market housing only. One respondent noted that any commuted sums from unsustainable</p>	

areas should be used to counteract their sustainability impacts. Two respondents highlighted issues in a specific location resulting from the current policy approach.

**Q8. Would you like to see any other housing options considered?**

Belton & Sons Ltd	We consider that Local Villages which are sustainably located with access to public transport and Main Towns (such as Keeston) should benefit from the positive allocation of housing sites. An additional option which incorporates this approach should be considered.
Jim Chesters	Would like to see a housing requirement that also increased the affordable housing proportion at all sites not just local villages. Affordable housing for local families is consistently flagged up as the major need but the proposals still lack a driven focus. This and the need for policies to maximise Brownfield sites should be paramount. The building industry will always seek market pricing on greenfield land as the most profitable development but policies should reflect this as the least likely to meet the County's true needs.
Cllr D Burrell (personal capacity)	I believe infill should only be allowed when it doesn't have a significant impact on open and green space and green infrastructure within villages.
Jason Evans	No Comment
Nolton and Roch Community Council	Important to consider linking certain settlements up that would benefit from clustering and to offer affordable housing for locals as a priority strategy.
Mathry Community Council	No
Angela Lebovic	Self-build
Stephen George	The current Density of 30 per Hectare in Pembrokeshire is treating towns like Haverfordwest in the same way as larger towns and cities like Wrexham, Swansea and Cardiff by applying the same Policy. Yet developers in Rural Haverfordwest are not permitted to build High Rise Flats and Town Houses which other towns and cities do in order to meet the 30 per hectare. Planners in Haverfordwest want new builds to look like other older developments and try to achieve this result by squashing everything into a small and often inadequate space. Thus by ticking the density box planners are creating on paper developments that buyers wanting to move to Pembrokeshire, or move to a new property with a gardens and garage cannot buy because the density does not allow development which are proportionate. EG a four bedroomed house with a double garage a parking area and a garden. It is now IMPOSSIBLE in Haverfordwest to provide a proportionate plot for a bungalow; Builders are being asked to build them but are

	<p>unable to provide a bungalow customers want to buy. The refusal of town houses on some sites just exacerbates this problem of squashing everything in to such an extent customers do not want to buy.</p>
<p>Gill George</p>	<p><b>The current Density of 30 dwellings per Hectare</b> is treating towns like Haverfordwest in rural Pembrokeshire in the same way as larger towns and cities like Wrexham, Swansea and Cardiff. It is illogical to apply the exact/same Policy when PCC do not in the same way allow higher rise and in many cases town houses, PCC are cherry picking which parts of the WG to apply which makes it very unfair.</p> <p><b>Developers</b> in Rural Haverfordwest are not permitted to build High Rise Flats and Town Houses which other towns and cities do in order to meet the 30 per hectare.</p> <p>Planners in Haverfordwest want new builds to look like other older developments and try to achieve this result by squashing everything into a small and often inadequate space. PCC can tick the WG density box, and planners in their minds are creating <b>on paper</b> developments that look awful and will not be pleasant to live in.</p> <p>Buyers wanting to move to Pembrokeshire, or locals wanting to move to a new build property with a gardens and garage cannot buy. The density interpretation and restriction of other types of dwellings such as town houses, do not allow an overall development which is proportionate. It is not unreasonable in a rural area to want to buy a new four bedroomed house with a double garage a parking area and a proportionate garden.</p> <p>In Haverfordwest it is now not possible to provide a proportionate plot for a bungalow. Builders are being asked by customers to build them but now find they are unable to provide a bungalow with a proportionate plot customers want to buy. The refusal of town houses on some sites just exacerbates this problem of squashing everything in to such an extent customers do not want to buy. The same is true for the building of flats.</p>



Conclusions:

Comments included proposals for Local Villages to benefit from allocations. Affordable housing prioritisation and potential for self-build flagged. Some comments on the locations that infill should be considered in. Two respondents highlighted concern over density levels.

**Other comments received**

Fishguard and Goodwick Town Council

1. Consideration of the existing plans of Fishguard and Goodwick showed very little undeveloped areas within the existing boundaries.
  2. The current development approved 2017 at the top of The Wallis alongside of the Fishguard/CefnDre/Scleddau Road area, was approved for affordable housing outside the existing boundary. No objection on behalf of the Town Council was given to this development.
  3. The major undeveloped site remains the Maesgwyn site where a big area is currently available for housing in the current plan. \*Please see below.
  4. The area marked HSG/034/KDP/01 is the former primary school site and former police station, has already been discussed for development with proposals. Whilst this is an obvious site for further town housing, access is not good with the exit via the one way system onto the Sladeway.
  5. As regards Goodwick, apart from the harbour village, there is very little undeveloped area available, apart from one or two infill spaces. There appears to be almost no development land available.
- Harbour Village site:
- The Fishguard and Goodwick Town Council has handed in person, drawings of an area in Harbour Village, Goodwick, to Mr. David Popplewell of Pembrokeshire County Council.
- Maesgwyn site:

	<p>This is the only realistic extension area of the town. Access is good and the site mostly level. However, it will take many years for any substantial area to be developed. And the reasons for this statement are:</p> <p>No obvious commercial growth in the Fishguard and Goodwick areas.  Current uncertainty over the future of the harbour in Goodwick  Most major developers have withdrawn from West Wales and are unlikely to return.  Any development on this site needs to be on a smaller requirements and a large emphasis on affordable housing, not speculative building to the county.</p>
Dwr Cymru	<p>We are pleased to note that our involvement in the LDP2 process to date has been taken into account when undertaking a review of the settlement hierarchy. Our view is that the availability of capacity on the public sewerage network or wastewater treatment works is a key factor in a settlement's sustainability.</p>
PCNPA	<p>Housing Provision and Distribution</p> <p>A range of options have been consulted upon which is welcomed and thought provoking. As with this Authority's Plan the recognition of the role the Wales Spatial Plan plays is welcomed. As the preferred spatial strategy is developed this Authority would welcome an opportunity to discuss how the approach fits with this Authority's Local Development Plan 2 spatial strategy (Examination anticipated at the beginning of 2019). The focus here will be in terms of how 'Local Villages' are treated</p>
<p><b>Conclusions:</b></p> <p>Note specific references to sites from Fishguard and Goodwick Town Council. These will be considered in the preparation of the Deposit Plan. Note support from Dwr Cymru of the inclusion of capacity of the public sewerage network or wastewater treatment works in a settlement's sustainability.  PCC will continue to liaise with PCNPA as the spatial strategy develops, to ensure conformity between the two Local Development Plans.</p>	