



Local Development Plan 2 (2017 – 2033)

Initial Consultation Report

December 2019

Abbreviations

AMR	Annual Monitoring Report
JUDP	Joint Unitary Development Plan for Pembrokeshire 2000-2016
LDP / LDP (2)	Local Development Plan / Local Development Plan (2)
LPA	Local Planning Authority
SA	Sustainability Appraisal
SPG	Supplementary Planning Guidance
TAN	Technical Advice Note
LHMA	Local Housing Market Assessment
PSB	Pembrokeshire Service Board
PCNPA	Pembrokeshire Coast National Park 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).

'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	A document which sets out where the current LDP (LDP1) needs to be changed and why. PCC published a draft of this document in 2017, a revised document will be published alongside the Preferred Strategy in December 2018.
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.

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Introduction

Local Development Plan Review

- i) 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.

Initial Consultation Report

- ii) This **Initial Consultation Report** has been produced to identify how the Authority undertook its Preferred Strategy Consultation which is a formal stage in the Local Development Plan Review process.

Preferred Strategy Consultation

- i) **Chapter 1** sets out a summary of the publicity carried out for the Preferred Strategy Consultation
- ii) **Chapter 2** advises regarding the approach the Authority took regarding engagement and the bodies it engaged in the preparation of the Preferred Strategy
- iii) **Chapter 3** sets out the main issues raised in response to the Pre-Deposit consultation and the Authority's response. A separate schedule has also been prepared with individual comments responded to (see Appendices).
- iv) **Chapter 4** provides information on how late representations were dealt with.
- v) **Chapter 5** provides a conversion chart for policy numbering. It shows what the policy number was in the Preferred Strategy and what it is in the Deposit Local Development Plan.
- vi) **Chapter 6** advises what the next steps are.

Chapter 1: Publicity

1. The Council's Pre-Deposit Documents were published for an 8-week consultation between 17th December 2018 and 4th February 2019. These included:
 - A **Preferred Strategy**, which set out for public consultation, a draft Vision, Objectives and overall growth strategy for the Authority.
 - A **Review Report** which set out which parts of the current LDP might need to change and why.
 - The **Initial Sustainability Appraisal Report** which set out how the Preferred Strategy proposals were assessed for their social, economic and environmental impacts.
 - The **Habitats Regulations Appraisal Screening Report** which assessed whether or not the Preferred Strategy was likely to impact on a Natura 2000 site. These are sites designated for their importance habitats and species.
 - The **Candidate Sites Register** showed all of the sites (over 450) submitted to the Authority last year as part of its call for Candidate Sites.
2. The Preferred Strategy and accompanying documentation was placed on the Authority's website and all those on the Authority's mailing list were notified of the consultation.¹ A call for Additional Candidate Sites was also made at this time. All Candidate Sites received as Additional Candidate Sites were subsequently added to the Candidate Sites Register.
3. A formal notice was published in the local newspaper (the Western Telegraph) during the consultation period and a general press release was issued.
4. Two videos - one animation and one 'talking head' were released on the Council's social media pages and on the Preferred Strategy web page. An Easy Read version of the Preferred Strategy was also made available online and in libraries and contact centres.
5. A number of engagement events were held including two Town and Community Council workshops facilitated by Planning Aid Wales² and a Key Stakeholder Workshop³. Meetings were also held with the Affordable Housing Working Group and the Gypsy Traveller Steering Group. A Youth Seminar was held after the consultation period with 6th formers from local schools.

¹ <https://www.pembrokeshire.gov.uk/local-development-plan-review/preferred-strategy>

² <https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base> see LDP Evidence webpage: Feedback from Town and Community Council workshops Jan 2019: Pre Deposit Consultation

³ <https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base> see LDP Evidence webpage: Feedback from Stakeholders workshop Jan 2019: Pre Deposit Consultation

Chapter 2: Methods of Engagement

- a. The table below provides a summary of consultation and engagement prior to placing the Plan on Deposit. It is based on the identified methods of consultation set out in section 3.24 of the Delivery Agreement. A column on the right identifies whether or not the engagement methods identified in the Delivery Agreement were complied with.

Plan Preparation, Community Involvement Stages and Actions						
Stage	Key Actions	SA/SEA	HRA	Who should be involved?	Methods of Involvement	Target met?
1 DEFINITIVE STAGES						
Review Report	<ul style="list-style-type: none"> • Assess issues from AMR reports • Liaise with Members. • Offer general public opportunity to comment. 			<ul style="list-style-type: none"> • Members • Internal Consultees • General Public 	<ul style="list-style-type: none"> • Workshop with Members (January 2018) • Workshop with Town and Community Councils (6th December and 13th December 2017) • Press & PR • Public notice • PCC website & via social media⁴ 	YES
Delivery Agreement⁵	<ul style="list-style-type: none"> • Prepare a timetable for Plan preparation • Develop CIS • Identify Key SPG to be developed alongside Plan Review • Engage with City, Town & Community Councils 	<ul style="list-style-type: none"> • Consider the stages of SA work in the timetable • Identify consultation processes for SA in the CIS 		<ul style="list-style-type: none"> • Members • Internal Consultees • City, Town & Community Councils • General public 	<ul style="list-style-type: none"> • Workshop with Members (January 2018) • Workshop with Town and Community Councils (6th December and 13th December 2017) • 	YES

⁴ <https://www.pembrokeshire.gov.uk/local-development-plan-review/review-report>

⁵ Section 63 of the 2004 Act; LDP Regulations 5-10 2005 / 2015

Plan Preparation, Community Involvement Stages and Actions						
Stage	Key Actions	SA/SEA	HRA	Who should be involved?	Methods of Involvement	Target met?
	<ul style="list-style-type: none"> • Consult on and amend document following consultation. 				<ul style="list-style-type: none"> • Written information dissemination via post & email • Information on PCC website & via social media⁶ • Press release & PR⁷ • DA document available to view in customer service centres & libraries 	
Pre-Deposit Participation⁸	<ul style="list-style-type: none"> • Review Report (including review of AMR 1-4) • Call for evidence from 3rd parties • Review of existing LDP evidence base • Undertake/ commission research & surveys 	<ul style="list-style-type: none"> • Screening • Review other relevant policies, plans & programmes & sustainability objectives. • Agree methodology with stakeholders 		<ul style="list-style-type: none"> • Key stakeholders • Members • Internal Consultees • Specific & general consultation bodies 	<ul style="list-style-type: none"> • Meetings & discussions⁹ • Topic and area specific working groups (various) • Workshop with Key Stakeholders (26th April 2018) 	YES

⁶ <https://www.pembrokeshire.gov.uk/local-development-plan-review/delivery-agreement-including-the-community-involvement-scheme>

⁷ Radio Pembrokeshire, WT, Pembrokeshire Herald⁷, PCC Marketing Team

⁸ LDP Regulations 14 to 16A, 2005 / 2015

⁹ Meeting with Pembrokeshire Public Services Board 21st November 2017, meetings with Affordable Housing Working Group, Gypsy Traveller Steering Group, Minerals and Waste

Plan Preparation, Community Involvement Stages and Actions						
Stage	Key Actions	SA/SEA	HRA	Who should be involved?	Methods of Involvement	Target met?
	<ul style="list-style-type: none"> • Prepare technical background/issues papers to inform key stakeholder discussions • Engage with consultees to develop consensus on issues & strategy options • Call for Candidate Sites – which will remain open for 12 weeks 	<ul style="list-style-type: none"> • Gather baseline information • Produce & then undertake consultation on scoping report alongside key issues • Undertake SA/SEA of the options identified. • Early involvement of the environmental consultation bodies • Consult with statutory bodies and bodies representing social and economic interests on the SA Scoping Report – five week consultation period 		<ul style="list-style-type: none"> • City, Town & Community Councils • Young People • Gypsy Travellers 	<ul style="list-style-type: none"> • Workshop with Members (16th July 2018) • Youth Seminar (13th March 2019) • Written information dissemination via post & email • Information on Council website & social media outlets¹⁰ • Press release to advertise call for Candidate Sites. • Contact City, Town and Community Councils to provide views on the approach to be taken to Candidate Site evaluation. (letter/email sent 11th June – informal consultation until 23rd July 2018). 	

¹⁰www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-strategicoptions

Plan Preparation, Community Involvement Stages and Actions						
Stage	Key Actions	SA/SEA	HRA	Who should be involved?	Methods of Involvement	Target met?
Pre-deposit public consultation on preferred strategy & options & associated SA/SEA/HRA/AA	<ul style="list-style-type: none"> • Publish Candidate Sites Register • Obtain Member approval of the strategic options & preferred strategy • Publish, advertise & distribute the Preferred Strategy. • Formally advertise the public consultation stage • Undertake both formal & informal public consultation (statutory six weeks) • Provide feedback & comments on the representations received 	<ul style="list-style-type: none"> • Prepare the initial SA report (including SEA) • Publicise the SA/SEA evaluation report to support the decision making progress in identifying preferred options • Outcomes considered in the consultation process • Public consultation on the LDP Initial SA report, alongside the Preferred Strategy 	<ul style="list-style-type: none"> • HRA of any changes to the preferred options to be undertaken • Results of HRA to be publicised • HRA of likely effects on European Sites 	<ul style="list-style-type: none"> • Key Stakeholders • Members • Internal Consultees • City, Town & Community Councils • Specific & general consultation bodies • General public 	<ul style="list-style-type: none"> • Members' Seminar (30th November 2018) • Key Stakeholder seminar (19th July 2018) • Meetings with specific interest groups¹¹ • City, Town & Community Council Seminar (18th July 2018 & 24th July 2018, January 2019) • Press Release & PR • PCC website & via social media¹² • Written consultations including e-newsletters • Copies of the Preferred Strategy and Initial SA Report at County Hall and in customer service centres & libraries 	YES

¹¹ Gypsy Traveller Steering Group meeting held on 5th June 2018, 30th January 2019 and 3rd October 2019. Affordable Housing Working Group meetings 24th January 2019 and 21st October 2019.

¹² <https://www.pembrokeshire.gov.uk/local-development-plan-review/preferred-strategy>

2. Key Groups Identified in the Delivery Agreement:

a) General Public

Delivery Agreement aim: Anyone who makes a representation on the Plan at any stage will be added to the Interested Person's Database and receive updates at all key stages of Plan development.

Achieved: Email and written letters have been sent to all of those on the Database at key stages of Plan development.

b) City, Town and Community Councils

Delivery Agreement aim: Area specific meetings will be arranged with representatives of City, Town and Community Councils and the appropriate Council Members at key stages of Plan preparation. These will provide a forum to discuss the emerging policies and proposals for different areas of the County. These meetings will also include the Pembrokeshire Association of **Local Councils** (PALC) and One Voice Wales, both of whom are umbrella organisations representing local councils in Wales.

City, Town and Community Councils have a key role to play in disseminating information on the LDP to their local area. They will also be important in providing information and views to shape the proposals for their areas. Each City, Town and Community Council has been asked to nominate a LDP lead, who will disseminate information to other Councillors and, working with the Clerk, co-ordinate responses to the Council throughout the Plan process.

Achieved: Regular meetings have been held with City, Town and Community Council's at key stages. All City, Town and Community Council's were asked to nominate an LDP Lead who has been sent specific LDP information in addition to the Clerk of the City, Town and Community Council.

Details of engagement:

- 6th/8th December 2017 (one afternoon and one evening session offered to all Town and Community Councils) - Introduction and discussion sessions.
- January 2018
Feedback to Town and Community Councils, and a request for a link councillor in addition of clerks. 14 Town and Community Councillors gave contact details.
- January 2018
Update email to inform clerk and link officer that the call for candidate sites had been delayed.
- March 2018
Update email to inform clerk and link officer that candidate sites could be submitted from 14/03/2018 to 14/06/2018.

- May 2018
Update email to inform clerk and link officer that candidate sites submission deadline has been extended to 14/08/2018.
- 11th June 2018 – 20th July 2018
Consultation on ‘Candidate Site Assessment Methodology’.
- 18th and 24th July 2018 Workshops on ‘Spatial Growth and Options’
- 14th and 21st January 2019 Workshops on Preferred Strategy consultation.

c) Hard to Reach Groups

Delivery Agreement aim:

- Young people – the established Children and Families Executive Group will be used to ensure the views of young people are considered in the process. A Youth Seminar bringing together pupils from local Secondary Schools will also be used.
 - Gypsies, Travellers and Travelling Show-people – Pembrokeshire has a comparatively large resident population of Gypsy Travellers, living both on sites and in housed accommodation. There are also a small number of Travelling Show-people within the County. This population will be reached primarily using existing channels of communication – which are through the Policy Planning and Change Manager (Social Care and Housing, Pembrokeshire County Council) and through the Pembrokeshire Gypsy Traveller Steering Group.

Achieved: A Youth Seminar was held in March 2019 to discuss the direction set out in the Preferred Strategy and inform the preparation of the Deposit Plan. The Children and Families Executive Group is no longer in existence and therefore has not been used as a group for engagement purposes.

Engagement with the Gypsy Traveller community have predominantly taken place through the Pembrokeshire Gypsy Traveller Steering Group. This group includes representatives from Local Authority Sites and a community group representative. Officers attended meetings of that group on 5th June 2018, 30th January 2019 and 3rd October 2019. Opportunities to submit Candidate Sites were flagged through the meetings. An early review of the Gypsy Traveller Accommodation Assessment (GTAA) was undertaken and overseen by the Steering Group. This updated GTAA has informed the preparation of the Deposit Plan.

d) Elected Members

Delivery Agreement aim:

The involvement of elected Members of Pembrokeshire County Council throughout the Plan process is recognised as being of key importance by the CIS. The role of Members during Plan preparation is complex and varied. They will provide information on and represent their local areas, disseminate information to local

residents and also provide a strategic input on matters affecting the whole Plan area. Members' seminars will be held before meetings of Cabinet where the LDP is being considered. The Cabinet Member for Planning and Sustainability is responsible for the LDP.

The approval of Full Council will be required at the Preferred Strategy and the Deposit Plan stages. It will also be needed for the Delivery Agreement, following consultation but prior to submission to Welsh Government.

Achieved: Members' Seminars have been held regularly throughout the LDP Review process (seminars held on 18th January 2018, 23rd April 2018, 16th July 2018, 30th November 2018, 14th March 2019, 22nd October 2019). Members' Seminars have been held to discuss all key stages of the Plan and also non-statutory stages such as the consideration of strategic options. All key stages of the LDP have been considered by both Cabinet and Full Council.

In addition to Cabinet and Full Council, the Authority has taken key documents to its Policy and Pre-Decision Overview and Scrutiny Committee for scrutiny. This included the Draft Preferred Strategy (13th November 2011) and Draft Deposit Plan policies (12th November 2019).

e) Stakeholder Groups:

Delivery Agreement aim: A Key Stakeholder Group will be established. This group will assist with plan preparation by providing a representative view during its development, up to and including the Deposit Stage. The group will be made up of officers from the bodies forming the Pembrokeshire Public Services Board (PPSB), together with occasional specialists with expertise in particular topic areas, if required for specific technical discussion. LDP matters will be discussed at bespoke meetings, rather than at the regular PPSB meetings.

Specific stakeholder groups may also be set up drawing on members of the specific and general consultation bodies, if required. They will provide a forum where views can be discussed and attempts can be made to reach a consensus on the way forward on specific topics or geographical areas. The topic areas might include:

- The economy
- Housing
- The environment
- Utilities and infrastructure
- Community, local services and culture
- Sustainability Appraisal including Strategic Environmental Assessment

Where there are existing partnership groups which already cover the topics identified, liaison with these groups may provide an alternative to setting up topic stakeholder groups.

In some cases, meetings may also be held with individual stakeholders.

Achieved: A Key Stakeholder group has been established. It contains officers from the bodies of the PPSB and other specialists. Meetings took place with the Key Stakeholder Group on 19th April 2018, 19th July 2018 and 23RD January 2019. A note of these meetings is available as part of the Council's evidence base.¹³

A specific meeting of Agents and Developers was set up to consider the Viability assumptions that supports the Deposit Plan. This meeting took place on 17th October 2019.

Specific meetings and discussion have also taken place with key providers such as Dwr Cymru and the Local Highways Authority.

f) Existing Partnerships

Delivery Agreement Aim:

The Council will seek to integrate its LDP consultations and activities with the work being carried out by other partnerships, wherever this is possible. These partnerships include:

- Pembrokeshire Public Services Board
- Pembrokeshire Business Panel
- Pembrokeshire Business Network
- Haven Waterway Enterprise Zone
- Health, Social Care and Well-being Joint Commissioning Partnership Board
- Local Nature Partnership
- Community Safety Partnership
- Children and Families Executive Group
- Affordable Housing Working Group
- Pembrokeshire Gypsy Traveller Steering Group
- Local Transport Forum
- Destination Pembrokeshire Partnership
- Pembrokeshire Planning Agents' Forum

It is anticipated that the existing work of these Partnerships will help inform the content of the Replacement LDP.

Achieved:

An overview of the LDP process was presented to the Pembrokeshire Public Services Board on the 21st November 2017

As set out above liaison has taken place with a number of key groups regularly, including the Affordable Housing Working Group and Pembrokeshire Gypsy Traveller Steering Group.

Meetings with the Pembrokeshire Planning Agents' Forum take place every three months and updates on the LDP have been given at each meeting. Representatives from this group were invited to attend a specific Viability meeting in October 2019.

Other Forums have been contacted where appropriate for specific pieces of evidence, for example contacts on the Haven Waterway Enterprise Zone and Pembrokeshire Business Panel and Pembrokeshire Business Network were interviewed as part of the Two County Economic Study. Officers from the Local Nature Partnership have advised on the Candidate Site process.

g) 'Specific Consultation Bodies' and 'UK Government Departments'

Delivery Agreement Aim: These consultees (referenced as Groups B2 and B3 in the Local Development Plan Manual 2015) comprise those bodies with specific functions that apply within the Plan area, for example Dŵr Cymru Welsh Water, which is the local water undertaker. The Authority also needs to consult UK Government Departments where aspects of the plan appear to affect their interests.

These consultees will be provided with an opportunity to comment at key formal stages in Plan preparation. Some of these groups may also be important members of other stakeholder groups.

Achieved: Consultees have received written information at key stages of Plan production. A number of consultees have also been invited to attend the Council's Key Stakeholder group.

h) General Consultation Bodies

Delivery Agreement Aim: General Consultation Bodies' include voluntary bodies, those which represent the interests of different racial, religious, ethnic, national or disabled groups in the Plan area, as well as those which represent the interests of persons carrying on business and those which represent the interests of Welsh culture.

'Other Consultees' are those which do not necessarily fall within the above categories, but still have an interest in the Plan area which may be affected by the Local Development Plan.

These bodies will be provided with an opportunity to comment at key formal (statutory) stages. Some of these groups may also be important members of other stakeholder groups.

Achieved: Consultees have received written information at key stages of Plan production. A number of consultees have also been invited to attend the Council's Key Stakeholder group or sit on other groups such as the Pembrokeshire Gypsy Traveller Steering Group.

i) Planning Agents and Developers and those suggesting land for development

Delivery Agreement aim: The existing Pembrokeshire Planning Agents' Forum which brings together representatives from the Local Planning Authority, local developers, architects and other agents working in Pembrokeshire will be used to ensure that the views of Agents and Developers within the County are considered during Plan preparation.

Those wishing to submit areas of land that they would like to see identified for development or other purposes will have the opportunity to do so through the Candidate Sites process. Anyone added to the Interested Persons' Database will receive regular mailings updating them on Plan preparation processes. The Council will issue a formal call for candidate sites and prepare a Candidate Site submission form and short explanatory note for those wishing to submit a Candidate Site. The standardised form is to ensure that sufficient data accompanies each Candidate Site submission, which will then allow a robust assessment to be made. All submissions must be made via the Candidate Site Submission form and returned to the Development Plans team via email at ldp@pembrokeshire.gov.uk or by post to the *Development Plans Team, County Hall, Haverfordwest, Pembrokeshire SA61 1TP*.

Achieved:

As set out above Meetings with the Pembrokeshire Planning Agents' Forum take place every three months and updates on the LDP have been given at each meeting. Representatives from this group were invited to attend a specific Viability meeting in October 2019.

All of those who submitted Candidate Sites or who commented on Candidate Sites have been added to the Council's database and have therefore received written communication at all key stages of Plan development.

Chapter 3: Main Issues identified from Pre-Deposit Consultation

Those responding to the Pre-Deposit Consultation have raised a number of issues. The main issues are set out below.

1. Comments received to the Preferred Strategy

A full report setting out all of the comments received, together with the Council report is set out in **Appendix 1**. The most significant issues are set out below, together with the identified Council approach. Pembrokeshire County Council's Full Council approved these responses on 9th May 2019.¹⁴

Levels of Growth

A number of respondents commented on the level of housing proposed by the Authority. Although a small number of responses suggested that the Authority should consider lower overall levels of growth to protect the environment, in general most respondents either supported the level of growth identified or suggested that a higher level of growth should be identified. Those proposing a higher level of growth tended to be individuals or organisations promoting specific sites for development. Welsh Government noted that the growth levels identified in the Preferred Strategy were in line with the 10 year build averages in Pembrokeshire.

Pembrokeshire County Council approach: No change proposed to the level of growth identified in the Preferred Strategy, however a reduction in the flexibility allowance for housing from 15% to 10% will be taken forwards in the Deposit Plan.

Spatial Distribution – 60% Urban/40% Rural split

The LDP Preferred Strategy proposed a 60%/40% Urban/Rural split of housing allocations (sites over 5 units). This is broadly in line with the current population split in Pembrokeshire.

The Welsh Government objected to the proposed spatial distribution, suggesting that it is not the most sustainable strategy and noting that they consider Option 1, 70% Urban /30% Rural would align better with the objectives of Active Travel Act by promoting sustainable travel options. CPRW have also objected on sustainability grounds, suggesting that a 65%/35% split would be more appropriate.

A number of objectors have supported the spatial strategy including Ateb, who noted that sustainability relates to a number of aspects in addition to accessibility to facilities. *“Without the provision of new housing at settlements such as Letterston, there exists a risk that issues of affordability would rise in more rural settlements and the viability of existing services would be threatened. New development is required to support the*

¹⁴ <http://mgenglish.pembrokeshire.gov.uk/ieListDocuments.aspx?CId=285&MIId=4343&Ver=4&LLL=0>

viability of these services". PCNPA have supported the strategy noting a conformity in approach between the two Authorities.

Pembrokeshire County Council approach: No change proposed to the spatial distribution strategy of the LDP. Additional evidence will be developed to demonstrate why the 60/40 split is the most appropriate strategy for Pembrokeshire and how it can deliver sustainable development. This will include evidence of deliverability of sites of appropriate sizes, information on the opportunities created by new technology and home working, the potential impacts on the rural economy of a more urban approach and also information on the Welsh language and Affordable Housing need.

Amendments to Context and Key Issues, Vision and Objectives

A number of minor amendments to the Context, Key Issues, Vision and Objectives have been proposed. Where these would increase clarity or the soundness of the Plan by making linkages with policy approaches clearer they are supported.

Pembrokeshire County Council approach: Amendments to the Context, Key Issues, Vision and Objectives are supported in cases where these would increase the clarity or soundness of the Plan, or where this would clarify linkages with policy approaches.

Need for additional evidence in certain areas

Welsh Government have identified a need for the Authority to develop additional evidence in certain topic areas. Work is underway across a number of technical areas to address this comment and the requirements of national policy and guidance.

Pembrokeshire County Council approach: PCC recognises the need to undertake further evidence work in a number of technical areas to further inform the development of the Deposit Plan. This includes publication of an updated Local Housing Market Assessment, a Local Viability Assessment and a Two County Economic Study. An updated Gypsy Traveller Accommodation Assessment will also be undertaken to support the Deposit Plan.

Changes to the Settlement Hierarchy

Planning Policy Wales Edition 10 was published by Welsh Government in December 2018, shortly after the Pre-Deposit consultation (including the Preferred Strategy) was finalised. Welsh Government have noted in their response that any references to PPW in the plan and supporting evidence base must be updated to refer to and reflect the principles in PPW Edition 10, specifically sustainable transport which ensures the location and design of new development reduces the need to travel and prioritises walking, cycling and public transport.

Pembrokeshire County Council approach: A number of updates to the Rural Facilities Study which informs the Settlement Hierarchy have been introduced in April 2019. These updates reflect up-to-date information and views provided by Members, City, Town and Community Councils and the public. The scoring also uses the most up to date public transport route information from PCC Highways, reflecting changes introduced in March 2019. In response to PPW Edition 10, a new point has been added which gives weight to settlements with a cycle-path or shared use path. Thresholds in relation to population have also been added into the scoring.

The recommended changes result in the following outcomes:

Please note: No changes to settlements identified as Towns are proposed

Service Centres

(30+ Pts and a minimum population of 500+ or 1000+ population with at least 25 Pts)

– No change from Preferred Strategy

Service Villages

(11-29 Pts and a minimum population of 100+)

Change from 48 Service Villages to 45 Service Villages with the following changes:

- Lose: Burton, Bwlch-Y-Groes East Williamston, Newchapel, Redberth, & Waterston
- Gain: Scleddau & Hill Mountain

Local Villages

(5-10 Pts and a minimum population of 30+ or with a population of 100+ or with an existing local store)

Change from 58 Local Villages to 51 Local Villages with the following changes:

- Lose: Bethesda, Bridell, Glandwr, Gumfreston, Hill Mountain (moved up), Llanfyrnach, Llys-y-Fran, Martletwy, Poyeston Cross, Princes Gate,

Rhoscrowther, Rhos-Hill, Scleddau (moved up), Treffynnon, Tufton & Welsh Hook (Many of the changes are due to the bus updates)

- Gain: Barnlake, Burton, Bwlch-Y-Groes, Cuffern, East Williamston, Newchapel, Redberth, Walton East, Waterson & Whitehill

Not defined (0-4 Pts) All other locations will be considered either Hamlets or Countryside depending on their physical characteristics

A full list of all settlements and their revised Hierarchy position, showing changes since the Preferred Strategy position is included in **Appendix B**.

Welsh Language Issues

Cymdeithas yr Iaith Gymraeg, objected to the Preferred Strategy and consider a more community led approach should be taken. They consider that the impact of every option on the Welsh language should be considered. They identified the Community Land Trust (CLT) approach as a positive one. They are also concerned that the SP 17 policy only applies in areas where more than 20% of the population speak Welsh and consider this should apply across Pembrokeshire.

Welsh Government have noted that “*The settlements to the north of the County have been identified as areas where the Welsh language is important, but it is unclear how this has influenced the scale and distribution of housing within these settlements and whether any mitigation of impacts from new development is proposed.*” In terms of developing an approach for the Deposit Plan, they have suggested that the Deposit Plan would benefit from further assessments in relation to the Welsh Language.

PCC undertook a Sustainability Appraisal on all options considered as part of the Preferred Strategy. A specific Sustainability Appraisal Objective (7) is: Protect & enhance the role of the Welsh Language & culture. All options were therefore assessed on the basis of their performance against this objective. The approach identifying areas of the County which are most sensitive in terms of the Welsh Language is in accordance with Welsh Government National Planning Policy and Guidance. In terms of the scale and distribution of housing within the North of the County – this will be in accordance with the settlement hierarchy and the capacity of individual settlements. Assessment of individual Candidate Sites will consider the overall scale of a proposal in relation to the scale of an individual settlement and the potential for this to impact on the Welsh Language. The ‘Cluster’ Settlement approach is a specific attempt to promote the Welsh Language across Pembrokeshire and to enable small scale development at settlements where the Welsh language is strong in order to support opportunities for Welsh speakers to remain within their communities. Further analysis of Local Villages with the potential to become Cluster Local Villages

was undertaken based on an updated assessment of rural facilities within the Rural Facilities Survey report April 2019. No Local Villages were identified as Cluster Local Villages based on the Welsh language speakers within the community council area. Thus, whilst PCC notes Welsh Government's advice on the Deposit Plan approach, there has been no opportunity to incorporate this moving forwards. Opportunities for communities to support CLTs will be supported in the Deposit Plan.

Pembrokeshire County Council approach: PCC notes the comments made. During the assessment of Candidate Sites, the potential impact on the Welsh language will be considered when sites are assessed in terms of their scale and location. Further work on the justification of the 20% threshold will be provided within the Deposit Plan. A CLT reference will be included in the Deposit Plan.

Environment – Climate Change, potential NVZs, SuDS, Renewable Energy

Welsh Government suggested that the Preferred Strategy did not adequately address the requirements of the Environment Wales Act. Natural Resources Wales (NRW) however have supported the LDPs new policy on protecting and enhancing the Environment and welcomed its approach. At a meeting with WG in February to discuss their comments, WG officials confirmed that a change to the title of the Strategic Policy SP 11 and the introduction of a specific reference to Green Infrastructure within the policy, rather than in the reasoned justification would be enough to satisfy their objection.

NRW have highlighted a need to mention agriculture in SP 11 to pick up on the potential introduction of NVZs. They have also supported references to Sustainable Drainage Systems (SuDS) in the Preferred Strategy. They have questioned the current approach to SP1 and its soundness. NRW have raised a number of detailed technical questions in relation to flood risk and the evidence PCC is gathering as well as some further detailed comments on references in the text.

In terms of Renewable Energy Welsh Government have raised a number of technical issues with the Plan's evidence base, these were discussed in a meeting with officials and further work will be done to support the Deposit Plan's approach prior to publication.

Pembrokeshire County Council approach: Where proposed changes from WG and NRW would improve clarity or soundness these will be incorporated into the Deposit Plan. NRW are on the steering group for the emerging Strategic Flood Consequences Assessment, they will also be a key consultee on Candidate Sites which will mean that they will assist in ensuring that flooding issues are dealt with appropriately in the Deposit Plan.

Delivery of Key Sites

WG have made the following comments on Strategic Housing Sites:

“Delivery of housing is reliant upon the authority allocating sites which are broadly deliverable and in accordance with its spatial strategy. The authority acknowledges “historically some large Strategic Housing Sites have not been developed. Small and medium size sites are more likely to be brought forward by the local housing market” (page 21). If the authority proposes to include strategic housing sites in the Deposit plan, evidence must demonstrate deliverability. The four large sites at Slade Lane North, Slade Lane South, Maesgwynne and Shoals Hook Lane, as summarised in the 2017/18 AMR, show little progress of delivering units on the ground. These sites will need further justification to remain in the plan. “

The Council is fully aware of the need to demonstrate deliverability in terms of its Housing Allocations. Work is already underway through various commissions, the ongoing Joint Housing Land Availability Studies and the assessment of Candidate Sites to ensure that those allocations identified in the Deposit Plan are appropriate and deliverable.

Pembrokeshire County Council approach: PCC note WG comments on deliverability. PCC will undertake site assessments of Candidate Sites in accordance with the published Candidate Sites Assessment Methodology and guidance in the LDP Manual. The 60/40 strategy has in part been identified as an approach to ensure that appropriate and deliverable sites can be allocated in the Deposit Plan.

Minerals – Sand and Gravel Resource

Welsh Government identified in their response that there is an under provision of sand and gravel reserves in the West Wales region and that the authorities should work collaboratively to address the shortfall and identify specific sites. The Council has also been made aware that the Regional Technical Statement for Aggregates for South Wales is currently undergoing its second revision.

PCC’s most recent call for Candidate Sites as part of the Pre-Deposit consultation was advertised widely and flagged to landowners and current quarry operators. Three additional Candidate Sites have now been proposed for sand and gravel – two by PCC as a landowner and one by an existing quarry operator. These will be assessed as part of the Candidate Site Assessment process.

Pembrokeshire County Council approach: PCC has identified the need to address the regional shortfall in sand and gravel reserves both within the Review Report and the Preferred Strategy. Candidate Sites have been assessed as part of the preparation of the Deposit Plan and PCC will continue to work collaboratively on a regional basis on this issue.

2. Responses to the Review Report

No substantive comments to the Review Report were received. Those responses received were generally supportive (see Appendix C).

3. Responses to the Initial Sustainability Appraisal Report and to the Habitats Regulations Appraisal Screening Report

Consultation comments on the Initial SA report were received from PCNPA. These were focussed on minor changes to the appraisal matrices, which do not change the overall conclusions of the appraisals. No other comments were received except for a general comment from WG flagging the need for PCC to ensure that we have met all the procedural requirements. (See Appendix D).

Comments on the HRA were received from PCNPA and NRW. These were very brief; confirmation from NRW that the appraisal includes the necessary information, including details of the SACs and SPAs in and bordering Pembrokeshire. PCNPA have proposed additional wording (in SP11) or an additional policy on European sites (See Appendix D).

Pembrokeshire County Council approach: Amendments to the Initial SA Report are supported in cases where these would increase the clarity or soundness of the approach, or where this would clarify linkages with policy approaches. Additional wording to reflect the European sites in Pembrokeshire will be added into SP 11.

4. Responses to the Candidate Sites Register

The consultation on over 450 Candidate Sites proposed by the public for development or protection generated significant interest in some geographic locations. The 'hot spots' for responses included the Haven Road and Douglas James Way in Haverfordwest, East Williamston, Hook, Penally, Pentlepoir and Wooden and St Mary's Field in Fishguard. Responses tended to be of support from the site's promoter, with local residents tending to object on various grounds including access, landscape, sewerage capacity, lack of services and other issues.

Candidate Sites were discussed in detail with Town and Community Council's during the workshops held in January – see report of consultation on the LDP evidence base page.¹⁵

¹⁵ ¹⁵ <https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base>

Between April and June 2019 PCC formally consulted key and statutory consultees including Highways, Trunk Roads, NRW amongst others on those sites which accord with the revised settlement hierarchy.

A Final Site Assessment Report detailing all comments received on Candidate Sites will be published alongside the Deposit Plan. That report will record the initial outcome for each Candidate Site submission.

Additional Candidate Sites Proposed

A total of 55 Additional sites were proposed across the Authority area. These have been published to the Council's Website – see <https://www.pembrokeshire.gov.uk/local-development-plan-review/candidate-sites>.

These Additional Candidate Sites were discussed with Members during a Seminar in March. A formal public consultation took place on these sites between April and May/June for 6 week period. Those sites that accorded with a revised settlement hierarchy were also sent to key and statutory consultees for comment between April and June 2019.

As with the original Candidate Sites proposed, a Final Site Assessment Report detailing technical comments received on sites will be published alongside the Deposit Plan in a Site Assessment Report.

Chapter 4: Late Representations

In the Delivery Agreement the Council states that:

“The Council will be firm on its stance to deadlines and all representations must be made by the specified closing date. Acceptance of late representations is entirely at the discretion of the Council. Where a representation/submission is late, the Council will only allow it to stand where evidence is provided to show how a genuine attempt was made to submit within a deadline. Otherwise the process is delayed and those who submitted on time will be penalised.”

All representations received were in time, or if late, were accepted by the Council as being in accordance with its published approach in such circumstances.

Chapter 5: Policy Conversion Table


Preferred Strategy Policy Number	Deposit Plan Policy Number
SP 1 Creating Sustainable Places	SP 1 Creating Sustainable Places
SP 2 Housing Requirement	SP 2 Housing Requirement
SP 3 Affordable Housing Target	SP 3 Affordable Housing Target
SP 4 Supporting Prosperity	SP 4 Supporting Prosperity
SP 5 – Settlement Hierarchy	SP 5 – Settlement Hierarchy
SP 6 Settlement Boundaries	SP 6 Settlement Boundaries
SP 7 Main Towns	SP 7 Main Towns
SP 8 Narberth Rural Town, Service Centres and Service Villages	SP 8 Narberth Rural Town, Service Centres and Service Villages
SP 9 Local Villages	SP 9 Local Villages
SP 10 Countryside	SP 10 Countryside
SP 11 Protecting and Enhancing the Environment	SP 11 Protecting and Enhancing the Environment
SP 12 Port and Energy Related Development	SP 12 Port and Energy Related Development
SP 13 Employment Land Provision	SP 13 Employment Land Provision
SP 14 Retail Hierarchy	SP 14 Retail Hierarchy
SP 15 Visitor Economy	SP 15 Visitor Economy
SP 16 Minerals	SP 16 Minerals
SP 17 Welsh Language	SP 17 Welsh Language
SP 18 Transport Infrastructure and Accessibility	SP 18 Transport Infrastructure and Accessibility
SP 19 Waste Prevention and Management	SP 19 Waste Prevention and Management
GN 1 General Development Policy	GN 1 General Development Policy
GN 2 Sustainable Design	GN 2 Sustainable Design
GN 3 Infrastructure and New Development	GN 3 Infrastructure and New Development
GN 4 Resource Efficiency and Renewable and Low-carbon Energy Proposals	GN 4 Resource Efficiency and Renewable and Low-carbon Energy Proposals
GN 5 Infill Development in Hamlets	GN 5 Renewable Energy – target and allocations
	GN 6 Employment Proposals
	GN 7 Employment Allocations
	GN 8 Mixed use Housing and Employment Proposals
	GN 9 Protection of Employment Sites and Buildings
	GN 10 Extensions to Employment Sites
	GN 11 Residential Development
	GN 12 Infill Development in Hamlets
	GN 13 Housing Mix, Space Standards and requirements for Lifetime Home Standards
	GN 14 Residential Allocations
	GN 15 Small sites target
	GN 16 Local Needs Affordable Housing
	GN 17 Exception sites for Local Needs Affordable Housing

	GN 18 Specialist and Supported Accommodation
	GN 19 Specialist and Supported Accommodation Allocations
	GN 20 Gypsy and Traveller Sites and Pitches
	GN 21 Telecommunications and Digital Technology Infrastructure
	GN 22 Protection and Enhancement of the Historic Environment
	GN 23 Community Facilities
	GN 24 Community Facility Allocations
	GN 25 Retail and Commercial Centre Development
	GN 26 Out-of-Centre Retail and Commercial Development
	GN 27 Farm diversification
	GN 28 Conversion or Change of Use of Agricultural Buildings
	GN 29 Marinas
	GN 30 Transport Routes and Improvements
	GN 31 Working of Minerals
	GN 32 Safeguarding and Prior Extraction of the Mineral Resource
	GN 33 Secondary Aggregates and Recycled Waste Minerals
	GN 34 Buffer Zones around Mineral Sites
	GN 35 Green Infrastructure
	GN 36 Coastal Change
	GN 37 Green Wedges
	GN 38 Landscape
	GN 39 Maintenance and Enhancement of Biodiversity
	GN 40 Protection and Creation of Outdoor Recreation Areas
	GN 41 Protection of Open Spaces with Amenity Value
	GN 42 Visitor Attractions and Leisure Facilities
	GN 43 Serviced and Hotel Accommodation
	GN 44 Caravan, Camping and Chalet Development
	GN 45 Site Facilities on Existing Caravan and Camping Sites
	GN 46 Waste Management Facilities
	GN 47 Disposal of Waste on Land

Chapter 6: Next Steps

The table below is an extract from the Delivery Agreement. It identifies the stages in the process and at what stage Plan preparation is currently at. The WG agrees that a 3 month slippage is acceptable within the approved timetable and PCC is within these parameters:

<i>Key stage</i>	<i>Definitive and indicative timings</i>
Review Report	Preparation started in May 2017, with the document published for informal consultation in November 2017, alongside the Delivery Agreement.
Delivery Agreement	Preparation started in May 2017, with the document published for formal consultation in November 2017.
Preferred Strategy	Preparation will start in July 2018, with the document expected to be published for formal consultation by December 2018.
Deposit	Preparation will start in April 2019, with the document expected to be published for formal consultation by October 2019.
Submission to Welsh Government	By July 2020.
Examination	Between Autumn 2020 and Spring 2021.
Publication of the Inspector's Report	By Summer 2021
Adoption	By late Summer or Autumn 2021

We are here 

The table below sets out the Delivery Agreement expectations for the steps before and during the Deposit Plan consultation.

<p>Preparation for, & publication of, the Deposit Plan¹⁶</p>	<ul style="list-style-type: none"> • Provide feedback & comments in form of Initial Consultation Report • Report to Council on Preferred Strategy & any changes • Publicise Preferred Strategy as changed • Consult on detailed local policies & proposals • Obtain Council approval for the Deposit Plan • Publish, distribute & advertise and consult on the Deposit LDP including supporting documents (statutory six weeks) • Make representations publicly available • Publish the initial outcome of each 	<ul style="list-style-type: none"> • Undertake SA/SEA of effects of detailed policies & proposals of the Deposit Plan. • Formal Deposit of SA report • Public consultation on draft SA • SA/SEA report included with Deposit Plan • Ask representors to submit SA / SEA for Alternative Sites 	<ul style="list-style-type: none"> • HRA of Deposit Plan required. • Include HRA in the deposit proposals to be published • HRA of proposals for Alternative Sites 	<ul style="list-style-type: none"> • Key Stakeholders • Members • Internal Consultees • All specific and general consultation bodies • City, Town & Community Councils • General Public • Young People • Gypsy Travellers 	<ul style="list-style-type: none"> • Press & PR • PCC website. • PCC social media • Written consultations – letter & email • Copies of the plan available in County Hall, customer service & libraries • Area based workshops, which will be open for City, Town and Community Councils and the general public • Youth Seminar • Key Stakeholder seminar • Members’ Seminar • Meetings with specific groups/interests.
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¹⁶ LDP Regulations 17 to 19, 2005 / 2015

	Candidate Site submission.				
2. INDICATIVE STAGES					
Representations on Deposit proposals of LDPs – collate & provide feedback on representations	<ul style="list-style-type: none"> • Prepare a formal PCC response to Deposit representations and publish these • Discuss strategic &/or substantial objections with respondent(s) & update the Consultation Report 			<ul style="list-style-type: none"> • Key Stakeholders • Members • Internal Consultees • All specific & general consultation bodies • City, Town & Community Councils • General public 	<ul style="list-style-type: none"> • Members' Seminar • Key Stakeholder seminar • Written consultations • Meetings • PCC website & social media • Written information dissemination via post & email

<p>Submission¹⁷ – prepare recommendations and report on all representations received for submission to the examination</p>	<ul style="list-style-type: none"> • Finalise feedback & comments in form of an updated Consultation Report • Submit the Deposit Plan, the SA report (including SEA), HRA, Community Involvement Scheme, Consultation Report, representations & supporting documents (including the Evidence Base) to National Assembly & Planning Inspectorate 		<ul style="list-style-type: none"> • Report of iterative HRA submitted 	<ul style="list-style-type: none"> • Key Stakeholders • Internal Consultees • Members • All specific and general consultation bodies • City, Town & Community Councils • General public 	<ul style="list-style-type: none"> • Press & PR • PCC website & via social media • Written consultations • Copies of documents in key locations (County Hall, Haverfordwest, which is the Deposit location, the Council’s Customer Service Centres and local Libraries)
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¹⁷ Section 64 of the 2004 Act; LDP Regulations 22 -23 2005 / 2015