

LDP2 Preferred Strategy - Council Report

Stakeholder ID	Representor Surname / Organisation	Type of Representation	Representation Summary	Representation Full Text	Officer Response
1494	Ashby-Ridgway (Nathaniel Lichfield & Partners)	Object	OBJECT PLAN SHOULD INCLUDE POLICIES TO SUPPORT THE RELOCATION AND ROLLBACK OF DEVELOPMENT IN AREAS AFFECTED BY COASTAL CHANGES.	In this context it will be important for there to be positive policies in place to support the relocation or rollback of development in areas that are affected by coastal changes. The emerging Plan should recognise and support this approach	PCC recognises the need to develop a specific policy approach on this issue within the Deposit Plan.
1494	Ashby-Ridgway (Nathaniel Lichfield & Partners)	Support	General support for whole document	General support for whole document	Support noted.
34415	Bell	Object	Object to the lack of clarity in defining 'Rurality'	TENP considers the Strategy is not clear as to the definition of Rurality nor what is seen as the answers to "the challenges of rurality" as expressed in the Strategy – is the whole of Pembrokeshire "Rurality" in relation to Wales as a whole or areas of Pembrokeshire other than the principal settlements ?	No change proposed. As noted in the key characteristics section of the Preferred Strategy, Pembrokeshire is a largely rural authority, with the fifth lowest population density in Wales. Specific issues are identified under the heading tackling rurality within the Key Issues and Drivers section.
34874	Bullimore	Object	Objection to use of caveats in LDP policies, with the suggestion that they should be more explicit and rigorous (examples given).	There seem to be a reasonable degree of understanding and reassuring wording regarding sustainability in some policies, but they are difficult to square with other proposed policies. LDP2 risks giving too much 'wiggle room' for developers by caveating obligations or requirements by the use of such escape clauses as "where possible" or "consideration should be given to ..." Instead, LDP2 policies need to be more clearly explicit and rigorous, for example requiring: ALL new housing to be low carbon, energy efficient and energy generating; NO multiple unit developments – say over the 5 units as otherwise identified in LPD2 – to be consented unless aligned with the public transport infrastructure and other relevant local services.	No change proposed at this stage. However further consideration will be given to the wording of specific policies prior to the publication of the Deposit Plan.
34874	Bullimore	Object	Objection, the focus is on housing development but there is little on supporting infrastructure provision - a significant omission that needs to be addressed.	LDP2 is clearly focussed on housing development with little consideration of the wider picture in terms of supporting infrastructure provision. This is significant omission needs to be addressed.	The LDP Strategy has been based on an assessment of existing services and infrastructure which has driven the identification of a settlement hierarchy (see SP 5). Policy GN,.3 Infrastructure and New Development provides the framework to ensure all development is supported by appropriate infrastructure.
34874	Bullimore	Object	general objection requesting that priority		

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			must be given to development of brownfield rather than greenfield sites, including putting further commercial (retail) developments in or close to town centres rather than in out of town retail parks	In terms of general sustainability, priority must be given to development on "brownfield" rather than greenfield sites. Not only would this contribute to meeting the sustainability objectives but it could also contribute to restoring the main town centres, which the draft LDP notes have "struggled commercially in recent years". To further address this, LDP2 policies need to be adjusted to ensure that further commercial (retail) developments are located in or close to town centres rather than encouraging or facilitating the continued exodus of businesses to out of town retail parks as has been exacerbated by previous policies, or lack of them.	In accordance with PPW Edition 10, the Authority will prioritise the use of suitable and sustainable previously developed land where this is available, before considering greenfield sites. However, Pembrokeshire does not have significant levels of previously developed land in sustainable locations, which is likely to constrain the level of development that can be directed in this way.
1555	Clarke MRTPI	Object	Object to the lack of Policy/Objective on protecting community, culture etc	What is missing from the document is an objective and/or policy to help protect Pembrokeshire's valued community, cultural and social facilities from unnecessary loss. We suggest the inclusion of such a policy which sets out criteria with which proposals for change of use or loss must address.	PCC recognises the need to develop a specific policy approach on this issue within the Deposit Plan.
1475	Edwards	Support	Support for incorporating the Well-being of Future Generations goals into emerging policies	We welcome the fact that you have incorporated the Well-being goals from the Well-Being of Future Generations Act 2015, into the emerging policies	Support noted
2325	Eynon	Support	Preferred Strategy support	Preferred Strategy support	Support noted.
1485	Griffith (Clerk)	Support	Support for Preferred Strategy	Support for Preferred Strategy	Support noted.
34785	Hunt	Object	Object to the omission of Lifetime Homes Standard for major housing developments.	PAG would also request that consideration be given to including a requirement that there should be a certain number of dwellings built to Lifetime Homes Standard for any proposed major housing development. This links in with the recognised need for affordable dwellings.	No change proposed to the Preferred Strategy at this stage, however further consideration will be given to this issue in the development of the Deposit Plan.
34785	Hunt	Object	Object to omission to require Changing Places Toilet facility at major commercial developments	PAG would also request that consideration be given to including a requirement that there should be a Changing Places Toilet facility in certain major commercial developments. For example those linked to tourism and leisure and those involving retail parks.	No change proposed, however the Council will publish a Planning Obligations SPG alongside the Deposit Plan which will set out how any contributions to infrastructure will be

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					assessed at an application stage.
34879	Jackson	Support	Support the Preferred Strategy	Support the Preferred Strategy	Support noted.
34745	Johnston	Support	Support for Preferred Strategy	Support for Preferred Strategy	Support noted.
3183	Jones	Object	Where developments require improvements to existing or new connections to the trunk road and these are agreed at planning, the developer will be required to enter into an appropriate legal agreement for their delivery, generally via Section 184 and Section 278 of the Highways Act.	Where developments require improvements to existing or new connections to the trunk road and these are agreed at planning, the developer will be required to enter into an appropriate legal agreement for their delivery, generally via Section 184 and Section 278 of the Highways Act.	Comment noted - this will be addressed by detailed Supplementary Planning Guidance on Planning Obligations.
3183	Jones	Object	Need Transport Statement/Assessment at CS stage	At planning stage candidate sites coming forward are required to be accompanied by suitable transport supporting detail dependent on scale, either a Transport Statement (TS) or Transport Assessment (TA). Applications will be judged on their individual merits and the Welsh Government as trunk road highway authority may request specific supporting traffic impact detail in order to consider network impacts. Where designs are not DMRB compliant the highway authority reserves the right to issue a direction to refuse an application under the Planning Act (Wales).	This is a matter of detail that will be addressed at a planning application stage.
3183	Jones	Object	Need links to Active Travel Act	It's also important that developers align design to principles set out in the Active Travel Act to ensure sites cater fully for all users on transport grounds, so have included a line in the first para.	Further consideration will be given as to how to best incorporate the principles of the Active Travel Act into the development of the Deposit Plan.
3183	Jones	Object	Reference to Network Capacity/Connection	The strategic trunk road network is for the safe and expeditious movement of long distance traffic. In order to maintain freeflow and safety there is a general presumption against new access. Development should in the first instance seek access via existing connections to the trunk road. Where a significant impact on existing junctions/access is significant, mitigation will be required in the form of appropriate improvements and all access proposals must be compliant with the trunk road highway standards of the Design Manual for Roads and Bridges (DMRB) and also apply the principles of the Active Travel Act. In order for the trunk road highway authority to be in a position to make a considered view, the onus is on the forward planning authority to provide highway evidence in both capacity and safety terms. Where there are existing network capacity constraints it would be important that sites having a significant impact or where there are strategic growth sites, that these are only enabled with agreed infrastructure upgrades. Early identification of funding and delivery streams such as S.106 contributions are important to ensure	The Welsh Government Trunk Roads section will be a specific consultee on Candidate Sites later this year as part of the Candidate Site Assessment process.

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				developments can be accommodated.	
1507	Newey	Object	Must meet all legal and procedural requirements of LDP production.	As always, we would urge you to seek your own legal advice to ensure that you have met all the procedural requirements, including Sustainability Appraisal (SA) Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA) as responsibility for these matters rests with your Authority. A requirement to undertake a Health Impact Assessment (HIA) arising from the Public Health (Wales) Act 2017, if appropriate, should be carried out to assess the likely effect of the proposed development plan on health, mental well-being and inequality.	Advice on meeting legal and procedural requirements noted.
1507	Newey	Object	Need to show plan's relationship to Well-being Plan, particularly in context of health and well-being.	Further evidence will need to be provided in the Deposit Plan to demonstrate; Preferred Strategy needs to show the plan's relationship to the Well-being Plan, particularly in the context of health and well-being.	The Plan already identifies its key issues under the headings of the Local Well Being and the Draft Issues, Vision and Objectives 2018 paper sets out how these accord with the national Well-Being Plan. Further work on this area will however be undertaken to inform the Deposit Plan.
1507	Newey	Object	The Preferred Strategy stage was an opportunity to publish policies not anticipated to change in Preferred Strategy.	Bearing in mind an adopted plan already exists there was an opportunity to use the Preferred Strategy stage to consult on those policies that are not anticipated to change, as well as those that will be amended.	PCC has included a number of policies which already largely exist, together with minor amendments in the Preferred Strategy.
1507	Newey	Object	Need to incorporate references to Planning Policy Wales 10	Planning Policy Wales (PPW) Edition 10, establishes the key national planning priority as the delivery of high quality, sustainable places, through placemaking. PPW requires a wider, sustainable and problem solving outlook, which focuses on integrating and addressing multiple issues. This means a move away from the traditional approach to considering policy areas in isolation and encourages more placed based policies. The seven well-being goals must also be demonstrated, together with the five ways of working which encourage everyone to think in an integrated and collaborative way about policy making, drawing out long term trends. Any references to PPW in the plan and supporting evidence base must be updated to refer to and reflect the principles in PPW Edition	All references within the Deposit Plan will be updated to refer to and reflect the principles in PPW Edition 10.
1507	Newey	Object	Deposit Plan must demonstrate information on commuting, public transport and air pollution.	- <input type="checkbox"/> the content of the Strategy is based on housing numbers as a starting point, but what has not been explored is what this means in terms of commuting, public transport or air pollution, for example.	PCC has published information on public transport as part of its Rural Facilities Survey, Information on commuting is included in the PACEC ECONOMIC Profile of Pembrokeshire (2015). An assessment of potential impacts on air pollution is included as part of the Sustainability Appraisal.
1507	Newey	Object	A robust evidence base is critical to fully		

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			understand the Preferred Strategy. The evidence base is limited.	As a replacement plan the limited context and background documents and topic papers on key issues, such as the Local Housing Market Assessment, affordable housing viability assessment, Gypsy & Traveller assessment (for the plan period) and employment and economic growth is disappointing as a robust evidence base is critical to fully understand the Preferred Strategy. While the consultation mentions draft studies and work to be undertaken for the Deposit plan, it is difficult to provide comments as many have yet to be completed	PCC recognises the need to undertake further evidence work in a number of technical areas to inform the development of the Deposit Plan.
34655	Peters	Support	Support the Preferred Strategy	Support the Preferred Strategy	Support noted.
34411	Reynolds	Support	General support for Preferred Strategy	General support for Preferred Strategy	Support noted.
34783	Sedgwick	Support	Support the Preferred Strategy	General support for the PS	Support noted.
<u>1. Context and Key Issues</u>					
2603		Support	Support Key Issues identified under Protecting our Environment	We are pleased to note the inclusion of two specific drivers under this heading; available public sewerage and wastewater treatment works (WwTW) capacity is a key element to ensuring sustainable and viable development sites, and as such we welcome the inclusion of this driver. Further, the nod to sustainable urban drainage systems is welcomed.	Support noted.
1494	Ashby-Ridgway (Nathaniel Lichfield & Partners)	Object	OBJECT TO ISSUE IN RELATION TO TOURIST ACCOMMODATION UNDER PROTECTING OUR ENVIRONMENT	Under the heading "Protecting Our Environment", the Preferred Strategy states: "Tourist accommodation is changing and we need to take this into account including where new sites can be located or extended." Bourne Leisure welcomes the recognition of the changing needs of tourist accommodation, in particular "where new sites can be located or extended".	No change proposed - tourism development can have a significant impact on the environment and therefore it is appropriate to classify it under this heading.
1494	Ashby-Ridgway (Nathaniel Lichfield & Partners)	Object	Object to tourism issue wording - propose additional text to clarify.	Under the heading "Protecting Our Environment", the Preferred Strategy states: "Tourist accommodation is changing and we need to take this into account including where new sites can be located or extended." Bourne Leisure welcomes the recognition of the changing needs of tourist accommodation, in particular "where new sites can be located or extended". Bourne Leisure's experience is clear; holidaymakers are increasingly seeking a wider range of	Agree to incorporate change to tourism issue under the heading 'Protecting Our Environment'. Rephrase issue to read "Tourist accommodation is changing and we need to take this into account, including where new sites can be located or where existing sites can be extended."

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<u>1. Context and Key Issues</u>					
				<p>accommodation types and a continual expectation of improved quality of existing parks, resorts and facilities. It is very important for the Council to provide policy support for the changes to the tourism sector in existing sites, as well as new sites, in order to maintain and contribute to the maintenance and growth of the tourism industry in Pembrokeshire.</p> <p>The following amendment for clarification is sought: “Tourist accommodation is changing and we need to take this into account including where new sites can be located or where existing sites can be extended.” (proposed amendments underlined)</p>	
1494	Ashby-Ridgway (Nathaniel Lichfield & Partners)	Support	Support for Paragraph 1.5 - Key characteristics	<p>The importance of the tourism industry to the local economy in Pembrokeshire is further recognised in Paragraph 1.5 of the Preferred Strategy which states: “The key characteristics and spatial land uses of the Plan area are: Employment continues to be focused on the tourism and service industry...”</p> <p>Paragraph 1.5 of the Preferred Strategy is also consistent with PPW (Ed. 10) which states that tourism is vital to economic prosperity and job creation in many parts of Wales (paragraph 5.5.1).</p>	Support noted.
2330	Chesters	Object	Objection to paragraph 1.16 – section on resourceful communities – add a reference to provision of health services at local and county level’	<p>Plan ref: - key issues and drivers 1.16 / subsection on resourceful communities – ‘provision of health services at local and county level’. This is especially important when the strategy prefers housing led population growth .</p>	No change proposed. This issue is already covered by the broader issues under Resourceful Communities which states "Access to good levels of services and facilities helps to support and maintain strong communities,"
1491	Dunne	Support	Support for approach	<p>Support the conformity of approach. Await further detail in the Deposit Local Development Plan</p> <p>F. Gypsy Travellers and Showpeople The Pembrokeshire County Council 2015 Gypsy Traveller Accommodation Need Assessment(2015 GTANA) identifies an unmet need for 32 residential pitches, plus two Travelling Showpeople’s yards, over the next five years (by the end of 2020). Over the Plan period for PCC and PCNPA (up to the end of 2021) this equates to a need for 37 residential pitches and two Travelling Showpeople’s yards. The unmet need over the period up to the end of 2031 for the pending PCNPA and PCC replacement Plans is projected to be 101 pitches, plus the two aforementioned yards.</p> <p>The Council has analysed the responses which identified a need for</p>	Support noted.

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<u>1. Context and Key Issues</u>					
				<p>additional accommodation. To help to plan future provision, this need has been grouped into three geographic areas. These are: Haverfordwest, Pembroke/Pembroke Dock and Kilgetty.</p> <p>No need has been identified in the Pembrokeshire Coast National Park.</p> <p>Pembrokeshire County Council's Local Development Plan Preferred Strategy recognises that there will be a continued need for Gypsy Traveller pitches.</p> <p>Officers of the National Park have liaised with the Council's Gypsy & Traveller Accommodation Assessment Steering Group during the revision of the Local Development Plan.</p>	
1475	Edwards	Object	Objection to policy SP 11 - no mention of agriculture and its potential impact on the environment (including NVZs) in this policy (Note - in the final sentence of the REP it is assumed NRW intended to insert 'no' before 'mention')	Page 22 – protecting our environment, bullet point 9 –states “Intensification of agricultural practices and potential impact on the environment including Nitrate Vulnerable Zones”, this is a key issue and one that was raised at the stakeholders meeting. However, there is mention of agriculture within policy SP 11 or the supporting text.	A specific mention to agriculture will be introduced into the Deposit Plan, either in Policy SP 11 or in a specific General Policy on Biodiversity.
34567	Evans	Object	Objection under 'Protecting Our Environment' & Ref to Environment Act Para 1.7	<p>The majority of our wildlife and habitats are in moderate or poor condition despite conservation efforts, there is a need to protect biodiversity and the resilience of ecosystems.</p> <p>Open space and green infrastructure need to be protected to support the well being of communities.</p> <p>1.7 The Environment Act 2016 puts in place the legislation to plan and manage Wales' natural resources. It includes an enhanced biodiversity duty which requires Public Authorities to maintain and enhance biodiversity and to promote the resilience of ecosystems.</p> <p>The exception sites will not over rule 1.7 and (6.1)</p>	No change proposed. Note concern regarding exception sites. The Deposit Plan will include a number of policies including SP 11 Protecting and Enhancing the Environment which will ensure that the Authority meets its duties under the Environment Act.
34567	Evans	Object	Object to the reference to Brexit under 'Tackling Rurality'	<p>Brexit will have particularly high impacts on our rural communities who may need to diversify further in order to remain viable.</p> <p>This should state Brexit may (and not will). No one knows what BREXIT will consist of or if it will happen. The environment secretary has already stated that the full GAP subsidies will be paid until 2024 and then focused on farmers instead of landowners</p>	Bullet point 4 is based on evidence base gathered in LDP preparation including research by the Public Policy Institute for Wales on The Implications of Brexit for Agriculture, Rural Areas and Land Use in Wales (Jan 2018) which indicates high potential impacts from Brexit on rural communities. Further evidence on impacts of Brexit are based on research from the London School of Economics which estimates an impact of -1.,1% to -1,8% GVA for Pembrokeshire (Local

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<u>1. Context and Key Issues</u>					Economic Effects of Brexit, LSE 2017),
1507	Newey	Object	Need to demonstrate importance of collaborative working between neighbouring LPAs.	The Planning and Compulsory Purchase Act 2004 (PCPA 2004) tests of soundness and PPW emphasise the importance of collaborative working between neighbouring LPAs to secure the best possible planning outcomes for communities. Pembrokeshire has strong relationships with Pembrokeshire Coast National Park Authority, Ceredigion and Carmarthenshire County Councils to the North and East. The plan should demonstrate how these relationships have influenced the strategy and at later stages, plan policies/proposals and site allocations.	Comment noted. The Deposit Plan will include further information on how relationships with neighbouring planning authorities have shaped the strategy and detailed policies and site allocations.
1507	Newey	Object	Large sites have not come forwards and 4 large sites will need further justification to remain in the plan.	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.	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.
1507	Newey	Object	GTAA must identify a need for entire plan period and appropriate allocations should be made to meet the identified need.	Gypsy and Traveller provision The Gypsy Traveller Accommodation Assessment (GTAA) covers the period to 2031, not the entire plan period to 2033. The GTAA must identify a need for the entire plan period (up to 31 December 2033). This must be undertaken in advance of the Deposit plan consultation to ensure the plan clearly identifies the total and types of need over the plan period and makes appropriate provision. Given the high level of need identified in the current GTAA (101 pitches until 2031) this is a key issue for the authority and failure to identify the level of need and allocate sites in the Deposit Plan to meet the identified need is likely to result in the plan being unable to be found 'sound'.	PCC recognises the need to undertake further evidence work in a number of technical areas to inform the development of the Deposit Plan.
1507	Newey	Object	Deposit Plan will need to demonstrate links to wider region, particularly PCNPA and Swansea Bay City Region.	Further evidence will need to be provided in the Deposit Plan to demonstrate; -□links to the wider region, particularly with regard to the Pembrokeshire Coast National Park Authority and Swansea Bay City Region ;	PCC recognises the need to undertake further evidence work in a number of technical areas to inform the development of the Deposit Plan.
1564	Sinclair	Object	Object to identification of struggling town centres under Tackling Rurality.	Para 1.15 Key Issues and Drivers Page 22 re Tackling Rurality - there is the phrase "Most town centres are struggling with higher than average vacancy rates and fewer retail allocations will be needed than in the past" - which would seem inappropriate as the first point re Tackling Rurality. It is suggested that this point should be relocated to Living and Working – unless the whole Plan area is seen as suffering from Rurality.	Objection noted. PCC agree that this issue would be more appropriately identified under a different heading, but suggest instead identifying it under the heading 'Resourceful Communities'.

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<u>1. Context and Key Issues</u>					
1564	Sinclair	Object	Object to the lack of clarity over bullet point 4	In terms of bullet point 4 of Tackling Rurality, why is the impact of Brexit likely to be more on rural communities ?	Bullet point 4 is based on evidence base gathered in LDP preparation including research by the Public Policy Institute for Wales on The Implications of Brexit for Agriculture, Rural Areas and Land Use in Wales (Jan 2018) which indicates high potential impacts from Brexit on rural communities.
1564	Sinclair	Support	Support for Bullet points 2 and 3 under Tackling Rurality	In terms of bullet points 2 & 3 under Tackling Rurality we would agree with both and therefore consider that the drafting Policy GN5 in particular is inconsistent with the 'vision' of Tackling Rurality.	Support noted.
<u>2. Vision and Objectives</u>					
2603		Support	Support Criteria I of the LDP Objectives	The availability or capacity of infrastructure – particularly in rural areas – is a key aspect in determining the sustainability of a settlement. Infrastructure improvements can therefore act as a catalyst to directing development to these locations and as such, we support the inclusion of criteria I) of the LDP Objectives.	Support noted.
1494	Ashby-Ridgway (Nathaniel Lichfield & Partners)	Support	Support for the LDP Vision	The Preferred Strategy LDP Vision states: “Employment opportunities linked to start-up businesses, tourism, rural diversification, the green and blue energy industry and new sectors linked to the strategic opportunities provided by the Milford Haven Waterway and links to Ireland are promoted.” (paragraph 5.5.2) Bourne Leisure endorses the overall promotion of employment opportunities particularly those linked to tourism within the Preferred Strategy. The Preferred Strategy LDP Vision is consistent with Planning Policy Wales (PPW) (Edition 10) which states “the planning system encourages tourism where it contributes to economic development, conservation, rural diversification, urban regeneration and social inclusion, while recognising the needs of visitors and those of the local communities.” (paragraph 5.5.2)	Support noted.
1494	Ashby-Ridgway (Nathaniel Lichfield & Partners)	Support	Support for draft objective C	Draft Objective C of the Preferred Strategy states: “Sustain and enhance the rural and urban economy by supporting start-up businesses, rural diversification, changing agricultural practices, the visitor economy and the expansion of Small and Medium enterprises”. Draft Objective C is supported, particularly those aspects related to	Support noted.

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<u>2. Vision and Objectives</u>					
				<p>tourism.</p> <p>PPW (Ed. 10) states that “in rural areas, tourism-related development is an essential element in providing for a healthy and diverse economy” (paragraph 5.5.3). It also states that “in rural areas, tourism-related development is an essential element in providing for a healthy and diverse economy” (paragraph 5.5.4). This is certainly the case in Pembrokeshire, as recognised at paragraph 3.16 in the adopted LDP, which states that the tourist industry is the largest industry and employer in the county. It is important for the Draft Objectives of the Replacement LDP to provide support for employment opportunities, linked directly and indirectly to tourism. This in turn creates a strong tourism economy to the benefit of the social and economic well-being of the local communities.</p> <p>Draft Objective C is consistent with the Draft LDP Vision (above).</p>	
34415	Bell	Support	Support for the Vision and Objective 2	<p>TENP considers that whilst the Vision and Objective 2 are supported –</p> <ul style="list-style-type: none"> •□LDP2 Vision ... where the challenges of rurality and climate change are successfully tackled...(para 2.2) •□LDP2 Objectives include ... A) Mitigate and respond to the challenges of Climate Change. (Para 2.4) <p>a number of the Policies relating to the distribution of new build dwellings are contrary to that Vision and Objective A) and therefore that LDP2 is not ‘sound’.</p> <p>Nor does a policy of a more dispersed settlement pattern explain how the challenges of rurality are met and mitigated.</p>	Support noted.
1555	Clarke MRTPI	Support	Support Objectives D & I	<p>We are supportive of LDP Objectives D. and I. which seek to support communities and the provision of homes through key community facilities and services and facilitating the improvement of such services.</p>	Support noted.
34567	Evans	Object	Object to LDP Objective D	<p>Objective D: Sustain resourceful communities by providing a range and mix of homes supported by key community facilities and services.</p> <p>PCC has in Pembroke tried to close the library and tourist information centre which has only stayed open in the interim by the town council paying £20,000. They have also consulted to close the public toilets and the main street ones are now closed in the winter but the cost to use is now 40p. They now charge for parking at the railway station which discourages people to park and ride.</p> <p>Patients including OAP's have to queue before opening time in order to obtain a doctor consultation and St Oswalds surgery in Pembroke is now only open in the morning, meaning patients have to travel to Argyle street. How can the LDP-2 have so much growth in building when they are</p>	No change proposed. Objective D is an important element of ensuring Sustainable Development. A detailed general policy to support and protect Community Facilities will be included in the Deposit Plan.

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<u>2. Vision and Objectives</u>					
				actually running services down? A plan for improving the services should be alongside LDP-2 and where will the money come from and how much will the budget will be .?	
<u>3. Strategic Growth Options Appraisal</u>					
2124	Belton	Object	Object to level of growth	<p>The Preferred Growth Option of delivering 425 dwellings per year is objected to as it would result in the Plan failing the tests of soundness in that it does not fit (i.e. by no having regard to national policy and being inconsistent with regional plans) and is not appropriate (i.e. by not enabling the delivery of a strategy that is positive and aspirational). By comparison, the preferred level of growth would result in a decrease of 147 homes per annum, 2,205 homes over the Plan period. It should be noted that the current LDP has not been delivering the required level of housing growth targeted – with the latest (2018) JHLAS confirming a housing land supply of 4.5 years. There is accordingly a need to remedy the consistent under-delivery of housing over recent years in Pembrokeshire.</p> <p>Planning Policy Wales (Edition 10) (PPW) Paragraph 4.2.6 confirms that Welsh Government projections “will form a fundamental part of the evidence base for development plans” in order to identify an appropriate strategy for the delivery of housing in the plan area. They are projections that do not account for wider policy and economic considerations. Accordingly, having regard to the specific context and circumstances apparent in Pembrokeshire, it would not be appropriate to consider the demographic trend scenarios (Options 1 to 3).</p> <p>In respect of setting the housing requirement, PPW Para 4.2.6 states: “Appropriate consideration must also be given to the wider social, economic, environmental and cultural factors in a plan area in order to ensure the creation of sustainable places and cohesive communities.” In light of the above, support is provided for Growth Option 6: Dwelling – Led (Current LDP) Scenario. The level of growth proposed should be in line with this Option for the reasons outlined below.</p> <p>The dwelling-led (Current LDP) scenario results in the highest population growth outcomes, driven by increased net migration flows required to support the annual change in dwellings. The LDP (2013) target of +572 dpa would suggest a population growth rate of 16.6% over the 2017–2033 plan period.</p> <p>Issues of affordability are prevalent in Pembrokeshire. Housing is now significantly less affordable than in the late 1990s, which has caused some suppression in household formation. Pembrokeshire’s median wage is the second-lowest in Wales (State of the Nation 2017: Social Mobility in</p>	No change proposed to the level of growth identified in the Preferred Strategy. As set out in the Preferred Strategy the growth level is slightly above that derived from a 15 year migration trend and in the middle of average completion levels across the last 5 and 10 years. Because the figure is within the range delivered historically by the local building industry, the Authority is confident that it represents a deliverable target. The slightly higher figure will support greater levels of affordable housing and help to ensure a more balanced population profile by 2033.

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3. Strategic Growth Options Appraisal

Great Britain). Despite this, across Welsh counties, Pembrokeshire saw the highest rise at 8.1% in the last quarter of 2017 (Principality/Aca Data, Land Registry, January 2018). Levels of need for Affordable Housing are still acute in Pembrokeshire with a need for 1,641 affordable homes a year (Local Housing Market Assessment, 2014) (significantly more than the number of market dwellings built each year). As identified within the 2016-2017 Annual Monitoring Report (AMR) (Page 27), utilising the current LDP requirement “may reduce some of the historic pressure on housing costs that might be resulting in lower rates of household formation than would otherwise be expected”. Accordingly, the continuation of housing development at a significant level (at least in line with current LDP growth levels) is required to make any substantive difference to house price affordability.

By way of wider context, the Barker Review of Housing Supply (2004) indicated that an 86% increase in house building would be required to bring house price inflation down to the European average: “Achieving the desired improvement in the housing market would, it was asserted, require an additional 120,000 housing starts per year on top of the 140,000 in 2002/3, taking the annual total to 260,000. According to the Review’s modelling, this scenario would see between 5,000 and 15,000 newly formed households priced into the market in each year between 2011 and 2021.”

The PPIW Report Publication – Future Need and Demand for Housing in Wales prepared by the late Dr Holmans formulates two estimates of the need and demand for housing in Wales over the period 2011 to 2031 - one based on the Welsh Government’s official projections for growth in the number of households (the ‘principal projection’), the other based on a projection developed by Dr Holmans (the ‘alternative projection’), who argued that the Welsh Government may have under-estimated future growth in the number of households.

Based on the principal projection, Dr Holmans estimates that in the period 2011-2031, an additional 174,000 homes will be needed. The alternative projection gives a higher estimate of need and demand: 240,000 units over the same period. In contrast, the 2014-based Welsh Government Household Projections indicate a growth of circa 86,000 homes within the region over the 25-year period (2014 to 2039).

Put alongside historic rates of house building in Wales, Dr Holmans’ analysis suggests that if future need and demand for housing in Wales is to be met, there needs to be a return to rates of house building not seen for almost 20 years, and an increase in the rate of growth of affordable housing.

We also note that the HM Treasury, Autumn Budget Statement (2017)

Stakeholder ID	Representor Surname / Organisation	Type of Representation	Representation Summary	Representation Full Text	Officer Response
3. Strategic Growth Options Appraisal				<p>commented that: "Increasing housing supply guards against macroeconomic instability. House prices tend to rise faster in environments with lower responsiveness of new housing supply. Cross-country studies show that lower house price variability is associated with lower variability in inflation, interest rates and real incomes"</p> <p>The importance of housing in underpinning the aspirations of the Swansea Bay City Deal (which Pembrokeshire County Council form a part of) should also not be underestimated. The City Deal comprises a £1.3 Billion investment; £1.8 Billion boost to the economy; and seeks to create 10,000 new jobs. As part of the City Deal, Pembroke Dock Marine is proposed as a £76m specific investment intervention –stating: "This project will unlock local growth and regeneration opportunities in the area, exploring marine and other energy sectors. The ambition will be that this project will create a cluster of resources, knowledge and capabilities in marine energy and other energy sectors to accelerate technological development and lead to indigenous business growth, new start up business and an attraction for international business in this field."</p> <p>Housing growth is imperative to underpin the job creation sought through the City Deal (not least at Pembroke Dock). Further modelling would be required to forecast the necessary level of growth in homes required to balance with job growth, but a simplistic method would be to assume that 1 job equates to one household – the rationale being that typically a home is occupied by c.2.1 people, of which 50% are economically active. On the basis of the +10,000 new jobs sought by the City deal, and assuming this is spread over a 20-year period, it would result in job growth of +500 per annum. This would be over and above (in addition to) the Welsh Government Household Projections and, the significant level of investment was not accounted for at the time of adoption of the current LDP.</p> <p>Notwithstanding the City Deal and in any case, the construction sector is projected to have the greatest number of employment numbers in 2025 when compared with other sectors (Labour Market & Curriculum Overview for Pembrokeshire, PCC, July 2015). It is moreover projected to have the greatest increase in projected employment and gross value added (GVA) to 2025. Strong local clusters of construction employment within Pembrokeshire is identified as a strength within the Economic Profile Report commissioned by PCC (June 2015). Integral to the growth of the construction sector is the provision of housing - both to provide accommodation for construction workers and to support the projected job creation. Reducing the rate of housing growth currently targeted and being delivered would represent a significant risk to the buoyancy of this sector and conflict with the economic aspirations of the City Deal (which is of utmost importance in the context of Pembrokeshire).</p> <p>In summary, for the reasons outlined above, the Preferred Growth Option</p>	

Stakeholder ID	Representor Surname / Organisation	Type of Representation	Representation Summary	Representation Full Text	Officer Response
<u>3. Strategic Growth Options Appraisal</u>					
				<p>is objected to as it is clear that Growth Option 6: Dwelling – Led (Current LDP) Scenario is the most appropriate to utilise for LDP 2, owing to:</p> <p>a) Planning policy dictates that the Welsh Government projections should form only one element of the 'key evidence' in respect of assessing housing requirements, and that there are a number of specific contextual, policy and economic considerations which need to be accounted for in the context of Pembrokeshire;</p> <p>b) The current LDP is delivering the rate of housing growth currently targeted. Stepping down from this level would represent a serious risk of triggering enhanced issues of affordability, which already comprises a significant pressure to the local population;</p> <p>c) Growth at current levels is required to support the construction sector (which is the greatest employer in Pembrokeshire); however, the current LDP does not account for the Swansea Bay City Deal. Significant housing growth (over and above current levels targeted) will be required to underpin the 10,000 new jobs targeted to be created within the region, a significant number of which will need to be accommodated and housed within Pembrokeshire due to the commitment for investment specifically in Pembroke Dock.</p>	
1485	Griffith (Clerk)	Object	objection to the Preferred Strategy – show actual annual average house-building rate achieved under LDP1 for comparative purposes	Under “strategic growth options appraisal” we consider that the actual annual average house-building rate achieved under LDP1 should be shown for comparison .	This information is set out in supporting evidence papers and within the Council's Annual Monitoring Reports (publicly available on the website) for information. No change is proposed to the Plan.
1507	Newey	Support	10 year build rate broadly accords with Plan's housing requirement.	The plan makes provision for 7,820 homes in order to deliver a requirement of 6,800 homes. Analysis of the build rates for the 10 years 2008/09 to 2017/18 would indicate an annual average of 407 dwellings per year. If this were extrapolated over the 16 year plan period 2017 – 2033 this would equate to 6,512 units. This broadly aligns with the plan requirement identified by the Council. (There are discrepancies in the Council's evidence regarding small site completions being omitted for several years 2015/16 to 2017/18).	Support noted.
<u>4. Spatial Options Appraisal</u>					
2603		Support	Support the Hierarchy approach	We have welcomed the engagement between the LPA and ourselves from the outset of the LDP and as part of this engagement we advised on the high-level infrastructure capacities of our water and sewerage infrastructure; we are therefore pleased to see that our comments have been considered and settlements positioned in the Settlement Hierarchy appropriately.	Support noted.
2330	Chesters	Object		Plan ref: - 4.3 Settlement Hierachy	

Stakeholder ID	Representor Surname / Organisation	Type of Representation	Representation Summary	Representation Full Text	Officer Response
<u>4. Spatial Options Appraisal</u>					
			objection to paragraph 4.3 – ensure ongoing review of settlement facilities, to avoid future population growth in settlements that no longer have the services to sustain their classification	Provision should be included for ongoing review of settlement facilities in order to avoid future population growth in settlements that no longer have the services to sustain their classification other than pure size of that population .	No change proposed. Although it is recognised that facilities change over time, there needs to be a consistent base date on which to develop a Deposit Plan. The final Deposit Plan will include a monitoring trigger which assesses any changes to facilities within settlements as part of the Plan Review process.
1934	Gigler	Object	objection to prospect of development on greenfield sites, one alternative being to use empty flats in Pembroke instead. Provision of affordable housing is supported (recorded as a separate representation) but there are concerns about where residents might find employment, how they will access medical care, how schools will cope and whether transport infrastructure is adequate.	<p>I'll begin with a quote from May 2018 by the minister responsible for housing: "the green belt needs to be protected. The plan to build 300,000 homes a year into the 2020s should be done creatively using the built environment and brown belt sites. Over 20 years, there will be three million new social homes; we shouldn't need to build on greenfield sites". I realise that local authorities have discretion in this regard. I realise that there is pressure from developers to release green fields which are cheaper to develop and help LAs to deliver therefore much needed affordable housing in their counties.</p> <p>In Pembrokeshire, from 2003 to 2008 the number of hectares of grassland declined by almost two and a half thousand. The number of hectares of rough grazing declined by 1308 hectares .</p> <p>There are many empty flats in Pembroke Welsh government made funding available for the refurbishment of buildings. Several of Pembroke's Main Street retail units have closed and might be considered for alternative use including residential units. Do we know the actual number of empty flats and potential buildings available for conversion to starter/affordable homes in and around Pembroke? We need to explore all options before choosing to sacrifice more green fields to the built environment.</p> <p>I fully support the need for more affordable homes . I simply ask for careful consideration of the sacrifice of green fields in order to meet this demand. Furthermore, if all the proposed greenfield candidate sites were realised, I have some infrastructure concerns.</p> <p>With potentially 30 plus houses per hectare being built where are these new households going to find employment locally? How are they going to access medical care with an already hard pressed GP practice and our local hospital under threat? Is the capacity of our schools going to be able to cope?</p> <p>I am aware of aspirations for regeneration in our town, though find the details difficult to access or engage with. Do these aspirations include projects for the future expansion of education and NHS facilities, and employment opportunities?</p> <p>Our transport infrastructure in and around Pembroke is another concern.</p>	In accordance with PPW Edition 10, the Authority will prioritise the use of suitable and sustainable previously developed land where this is available, before considering greenfield sites. However, Pembrokeshire does not have significant levels of previously developed land in sustainable locations, which is likely to constrain the level of development that can be directed in this way. At the Deposit stage a detailed policy on Community Facilities will be included in the Plan.

Stakeholder ID	Representor Surname / Organisation	Type of Representation	Representation Summary	Representation Full Text	Officer Response
<u>4. Spatial Options Appraisal</u>					
				The Bridgend bypass and its links, the route which may ease congestion and pollution in our Main Street is of huge consequence to the local population. I see it is "outlined" on the LDP map of Pembroke. How does that fit in to the timescale for the latest plan? How does one engage with it?	
1507	Newey	Object	Unclear how growth will be distributed within rural areas.	It is also unclear as to how the scale of growth is distributed within the County beyond the fact that 40% of the overall provision (3,128 dwellings) is proposed in the 115 rural settlements.	As set out in paragraph 6.18 of the Preferred Strategy, development will be proportional to the size of a settlement, its function and character and based on current service provision. Further work will take place on this area as part of the development of the Deposit Plan, but the precise split between tiers will also depend on the availability of deliverable sites and the outcome of the assessment of Candidate Sites.
1507	Newey	Object	No indication of how growth has been split between six different tiers or settlements.	Furthermore, there is no indication as to how growth has been split between the six different tiers of settlements, or why even there is a need for six tiers, excluding hamlets and open countryside?	As set out in paragraph 6.18 of the Preferred Strategy, development will be proportional to the size of a settlement, its function and character and based on current service provision. Further work will take place on this area as part of the development of the Deposit Plan, but the precise split between tiers will also depend on the availability of deliverable sites and the outcome of the assessment of Candidate Sites.
1507	Newey	Object	Higher commuted sums in less sustainable locations should be supported by viability assessment.	The 4th bullet point under 'policy approaches in rural areas' (page 33) states this will include higher levels of commuted sums to support affordable housing in "less sustainable locations". This is not supported by a viability assessment, or any published evidence and unclear how it relates to the 2012 LHMA	PCC recognises the need to undertake further evidence work in a number of technical areas to inform the development of the Deposit Plan.
1507	Newey	Object	Question strategy of 60/40 as evidence suggests 70/30 is the most sustainable strategy.	The Welsh Government questions why the Preferred Strategy (60% of development to main towns and 40% to the rural settlements) has been chosen as your evidence demonstrates it is not the most sustainable strategy. The Council's evidence states Option 1, a 70/30 split, is a more sustainable strategy. We disagree with the simplistic assumption there will be increased congestion and pollution issues arising from Option 1 as opposed to Option 2, particularly as the majority of employment and trip destinations will be in the main urban areas where the co-location of homes and jobs would be possible. Option 1 would align better with the objectives of Active Travel Act by promoting sustainable travel options.	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 sustainability objectives. This will include evidence of deliverability of sites of appropriate sizes, information on the opportunities created by new technology

Stakeholder ID	Representor Surname / Organisation	Type of Representation	Representation Summary	Representation Full Text	Officer Response
<u>4. Spatial Options Appraisal</u>					
					and home working, the potential impacts on the rural economy of a more urban approach and also further information in relation to the Welsh language and Affordable Housing need.
1507	Newey	Object	Spatial analysis should include fuller consideration of the way technology may shape how places function in the future in terms of digital connections, telecoms and access to it.	The spatial analysis would benefit from fuller consideration of the way technology may shape how places function in the future in terms of digital connections, telecoms and access to it and the benefits this could bring in terms of reducing journeys and reduce pollution. The contribution of active travel should also be explored together with promoting the need for charging infrastructure which would enable a switch to low emission vehicles making movement patterns more sustainable and decarbonising transport.	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 sustainability objectives. 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 further information in relation to the Welsh language and Affordable Housing need.
1737	Sinnett	Object	Object to level of growth - should be higher	<p>Preferred Growth Option</p> <p>The Preferred Growth Option of delivering 425 dwellings per year is objected to as it would result in the Plan failing the tests of soundness in that it does not fit (i.e. by not having regard to national policy and being inconsistent with regional plans) and is not appropriate (i.e. by not enabling the delivery of a strategy that is positive and aspirational). By comparison, the preferred level of growth would result in a decrease of 147 homes per annum, totalling 2,205 homes over the Plan period. The Council's Annual Monitoring Report indicates that the Council's Housing Land Supply has largely exceeded the minimum requirement set in TAN 1 to maintain a five-year supply of housing land. This indicates the previous housing requirement set in the current LDP is deliverable – and therefore accords with Planning Policy Wales (Edition 10) (PPW) Paragraph 4.2.4.</p> <p>PPW Paragraph 4.2.6 confirms that Welsh Government local authority level Household Projections for Wales "... will form a fundamental part of the evidence base for development plans" in order to identify an appropriate strategy for the delivery of housing in the plan area. They are projections that do not account for wider policy and economic considerations. Accordingly, having regard to the specific context and circumstances apparent in Pembrokeshire, it would not be appropriate to consider the demographic trend scenarios (Options 1 to 3).</p> <p>In respect of setting the housing requirement, PPW Para 4.2.6 states:</p>	No change proposed to the level of growth identified in the Preferred Strategy. As set out in the Preferred Strategy the growth level is slightly above that derived from a 15 year migration trend and in the middle of average completion levels across the last 5 and 10 years. Because the figure is within the range delivered historically by the local building industry, the Authority is confident that it represents a deliverable target. The slightly higher figure will support greater levels of affordable housing and help to ensure a more balanced population profile by 2033.

Stakeholder ID	Representor Surname / Organisation	Type of Representation	Representation Summary	Representation Full Text	Officer Response
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4. Spatial Options Appraisal

“Appropriate consideration must also be given to the wider social, economic, environmental and cultural factors in a plan area in order to ensure the creation of sustainable places and cohesive communities.”
 In light of the above, support is provided for Growth Option 6: Dwelling – Led (Current LDP) Scenario. The level of growth proposed should be in line with this Option for the reasons outlined below.

The dwelling-led (Current LDP) scenario results in the highest population growth outcomes, driven by increased net migration flows required to support the annual change in dwellings. The LDP (2013) target of +572 dpa would suggest a population growth rate of 16.6% over the 2017–2033 plan period.

Issues of affordability are prevalent in Pembrokeshire. Housing is now significantly less affordable than in the late 1990s, which has caused some suppression in household formation. Pembrokeshire’s median wage is the second-lowest in Wales (State of the Nation 2017: Social Mobility in Great Britain). Despite this, across Welsh counties, Pembrokeshire saw the highest rise at 8.1% in the last quarter of 2017 (Principality/Aca Data, Land Registry, January 2018). Levels of need for Affordable Housing are still acute in Pembrokeshire with a need for 1,641 affordable homes a year (Local Housing Market Assessment, 2014) (significantly more than the number of market dwellings built each year). As identified within the 2016-2017 Annual Monitoring Report (AMR) (Page 27), utilising the current LDP requirement “may reduce some of the historic pressure on housing costs that might be resulting in lower rates of household formation than would otherwise be expected”. Accordingly, the continuation of housing development at a significant level (at least in line with current LDP growth levels) is required to make any substantive difference to house price affordability.

By way of wider context, the Barker Review of Housing Supply (2004) indicated that an 86% increase in house building would be required to bring house price inflation down to the European average:
 “Achieving the desired improvement in the housing market would, it was asserted, require an additional 120,000 housing starts per year on top of the 140,000 in 2002/3, taking the annual total to 260,000. According to the Review’s modelling, this scenario would see between 5,000 and 15,000 newly formed households priced into the market in each year between 2011 and 2021.”

Welsh Government’s latest release (30 January 2019) on ‘Estimates of housing need in Wales at a national and regional level (2018-based)’ (‘article’) advises that these estimates replace the previous estimates of housing need in Wales produced by Alan Holmans and published by Public Policy Institute for Wales (PPIW) in 2015.

Stakeholder ID	Representor Surname / Organisation	Type of Representation	Representation Summary	Representation Full Text	Officer Response
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4. Spatial Options Appraisal

Holman's principle estimated a need of 8,700 homes a year over the complete twenty-year period 2011-2031, totalling an additional 174,000 homes needed. Holman's alternative projection gave rise to a higher estimate of need and demand of 240,000 homes over the same period. The new estimates presented in WG's article estimate a need of 5,700 units a year (based on a central estimate) over a twenty-year period 2018-2038, totalling an additional 114,000 new homes needed. We consider WG's Upper 5 Year Estimate should be used in order to take into account economic considerations including the Swansea Bay City Deal. Based on WG's Upper 5 Year Estimate there is an estimated need of 7,542 new homes a year over the complete twenty-year period (2018-2038) this totals an additional 150,840 homes needed. While this is lower than Holmans projections it is significantly higher than the 2014-based Welsh Government Household Projections which indicate a growth of circa 86,000 homes within the region over the 25-year period (2014 to 2039).

As this article has only just been released by the WG, we have not had an opportunity to fully scrutinise the content. We therefore reserve the right to comment further on these new estimates of housing need in Wales. We also note that the HM Treasury, Autumn Budget Statement (2017) commented that:

"Increasing housing supply guards against macroeconomic instability. House prices tend to rise faster in environments with lower responsiveness of new housing supply. Cross-country studies show that lower house price variability is associated with lower variability in inflation, interest rates and real incomes"

The importance of housing in underpinning the aspirations of the Swansea Bay City Deal (which Pembrokeshire County Council form a part of) should also not be underestimated. The City Deal comprises a £1.3 Billion investment; £1.8 Billion boost to the economy; and seeks to create 10,000 new jobs. As part of the City Deal, Pembroke Dock Marine is proposed as a £76m specific investment intervention –stating:

"This project will unlock local growth and regeneration opportunities in the area, exploring marine and other energy sectors. The ambition will be that this project will create a cluster of resources, knowledge and capabilities in marine energy and other energy sectors to accelerate technological development and lead to indigenous business growth, new start up business and an attraction for international business in this field."

Housing growth is imperative to underpin the job creation sought through the City Deal (not least at Pembroke Dock). Further modelling would be required to forecast the necessary level of growth in homes required to balance with job growth, but a simplistic method would be to assume that 1 job equates to one household – the rationale being that typically a home is occupied by c.2.1 people, of which 50% are economically active. On the basis of the +10,000 new jobs sought by the City deal, and assuming this is spread over a 20-year

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4. Spatial Options Appraisal

period, it would result in job growth of +500 per annum. This would be over and above (in addition to) the Welsh Government Household Projections and, the significant level of investment was not accounted for at the time of adoption of the current LDP. Notwithstanding the City Deal and in any case, the construction sector is projected to have the greatest number of employment numbers in 2025 when compared with other sectors (Labour Market & Curriculum Overview for Pembrokeshire, PCC, July 2015). It is moreover projected to have the greatest increase in projected employment and gross value added (GVA) to 2025. Strong local clusters of construction employment within Pembrokeshire is identified as a strength within the Economic Profile Report commissioned by PCC (June 2015). Integral to the growth of the construction sector is the provision of housing - both to provide accommodation for construction workers and to support the projected job creation. Reducing the rate of housing growth currently targeted and being delivered would represent a significant risk to the buoyancy of this sector and conflict with the economic aspirations of the City Deal (which is of utmost importance in the context of Pembrokeshire).

In summary, for the reasons outlined above, the Preferred Growth Option is objected to as it is clear that Growth Option 6: Dwelling – Led (Current LDP) Scenario is the most appropriate to utilise for LDP 2, owing to:

- a. Planning policy dictates that the Welsh Government projections should form only one element of the 'key evidence' in respect of assessing housing requirements, and that there are a number of specific contextual, policy and economic considerations which need to be accounted for in the context of Pembrokeshire;
- b. The current LDP is delivering the rate of housing growth currently targeted. Stepping down from this level would represent a serious risk of triggering enhanced issues of affordability, which already comprises a significant pressure to the local population;
- c. Growth at current levels is required to support the construction sector (which is the greatest employer in Pembrokeshire); however, the current LDP does not account for the Swansea Bay City Deal. Significant housing growth (over and above current levels targeted) will be required to underpin the 10,000 new jobs targeted to be created within the region, a significant number of which will need to be accommodated and housed within Pembrokeshire due to the commitment for investment specifically in Pembroke Dock.

In summary, for the reasons outlined above, the Preferred Growth Option is objected to as we consider Growth Option 6: Dwelling – Led (Current LDP) Scenario is the most appropriate to utilise for LDP2. The Preferred Spatial Option is supported, and growth should be directed towards Letterston which has strong service provision and will reduce the need for residents to travel.

Stakeholder ID	Representor Surname / Organisation	Type of Representation	Representation Summary	Representation Full Text	Officer Response
<u>4. Spatial Options Appraisal</u>					
1737	Sinnett	Support	Support 60/40 option	We support the preferred spatial option of delivering Option 2 (60% Urban and 40% Rural) which includes housing allocations within Service Villages. Carew/Sagetson is identified as a Service Village within LDP2, which we support.	Support noted.
<u>5. The Strategy</u>					
2603		Support	Support the Urban/Rural Split	Urban/Rural Split of Allocations: As we have previously discussed, we welcome this proposal for the majority of growth to be focused within urban areas as the provision and capacity of our water and sewerage infrastructure is more prevalent within urban areas.	Support noted.
2603		Support	Support ref to SUDS	Drainage and Sustainable Drainage Schemes (SuDS): We are pleased to note the reference to the recently established SuDS Approval Boards (SABs). As intimated, the requirement for new developments to obtain SAB consent may result in layouts and densities changing in some housing developments, but the onus is on landowners/developers to consider SuDS prior to master planning their site which will ensure there is no need to retrofit schemes into the design at a later stage. The requirement to obtain SAB consent will result in surface water being disposed of in a sustainable manner and will ensure that it does not need to communicate with the public sewerage network, thereby ensuring there is sufficient capacity in the public sewerage network for foul-only flows from development sites.	Support noted.
34415	Bell	Object	Object to the level for growth, 65/35 would be a better alternative	The Environmental Network for Pembrokeshire (TENP) expresses its concern that the proposed Strategy does not reflect the requirements of the Well-being and Future Generations (Wales) Act insofar as the Draft Strategy perpetuates the 60% - 40% split urban to rural for the proposed residential development apportionment and also permits residential development in locations where under the current Plan they would have been refused. A 65% : 35% apportionment would, it is suggested be more sustainable. One of the 7 Goals of the Well-being and Future Generations (Wales) Act 2015 is "A Prosperous Wales" where this Goal is described as "An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change);" The following are extracts from the Consultation document or accompanying Report to Cabinet.	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 sustainability objectives. 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 further information in relation to the Welsh language and Affordable Housing need.

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5. The Strategy				<p>LDP Para 5.8 Growth will be distributed across the Plan area in accordance with a spatial strategy which promotes sustainable development. ... A weighting system has been applied which gives greatest weight to those facilities identified as being likely to reduce the need to travel and therefore most likely to be a sustainable location. (Statements which TENP supports)</p> <p>... In particular greater weighting has been given to the presence of schools, frequent bus services and community halls, with slightly reduced weight given to post offices. (Source – Report to Cabinet 3rd December 2018). A line which TENP also supports. [Underlining for the purposes of this objection].</p> <p>TENP is also aware that:-</p> <ul style="list-style-type: none"> • <input type="checkbox"/> the Council itself has recently undertaken a consultation exercise on reducing bus services which is particularly likely to affect rural areas and there is therefore concern that many of these services will be so infrequent that most people outside the towns or along key routes will be required to have regular access to a private car for everyday needs employment, shops, health visits etc. Increasing the dependence on travel by private vehicle is not in the interest of a low carbon economy. There is an acknowledged need to reduce mileage by all vehicles whether they are petrol, diesel or electric due to gaseous and particulate omissions or the need to generate additional electricity to drive electric vehicles. • <input type="checkbox"/> Other services and facilities delivered by both the public and the private sector have been in decline for a number of years and this trend shows no sign of reversing. Examples include the closure of shops, petrol filling stations, primary schools, (for example Dale, Moylegrove, Pentlepoir, Mathry, Stackpole, Angle and Hayscastle), libraries, health centres etc. (The LDP Seminar at County Hall on 23rd January noted a recent closure of a facility / service at Cilgerran). • <input type="checkbox"/> There is an inability for health and social care organisations, including the voluntary sector, to meet a growing need by the elderly and vulnerable to provide home care. The existing challenge of meeting the needs of these residents will be compounded by having to meet the needs of additional clients in rural locations where greater travel time and therefore increased staff costs are required for each visit. • <input type="checkbox"/> Sewage disposal in scattered dwellings and in 'hamlets' is predominantly by septic tanks and sealed cess pits. Such answers are not the preferred solutions as contamination of ground water can occur if such systems are not regularly maintained / emptied. Ground water is the supply source for aquifers which in turn supply drinking water. • <input type="checkbox"/> Affordable housing (even for local needs) should, wherever possible, be concentrated in affordable locations; and TENP suggests that such locations would be close to existing services and facilities that would include shops, schools, health centres (including surgeries and pharmacies), community halls and (reasonably frequent) public transport and not in 58 Local Villages and certainly not in the Hamlets of proposed GN5. 	

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<u>5. The Strategy</u>					
				<p>Changes in the type of housing permitted will be at the lowest levels of the Settlement Hierarchy are proposed – LDP2 will permit market housing in these locations (currently only local needs Affordable Housing is permitted). A ‘clusters’ concept has been used to also identify lower level settlements (Local Villages) which can accommodate greater growth because of their relationships to more sustainable settlements. The Preferred Strategy also proposed a limited infill policy, to apply in locations outside settlement boundaries. Under the current LDP no development is permitted in these locations. (Source – Report to Cabinet 3rd December 2018).</p> <p>TENP considers that the above proposals for a more relaxed approach in small settlements should be revised as it encourages a more dispersed settlement pattern which is contrary to the legislative requirements to develop a low carbon society and does not help with accessibility issues.</p>	
2124	Belton	Support	Support 60/40 strategy	We support the preferred spatial option of delivering Option 2 (60% Urban and 40% Rural) which includes housing allocations within Service Villages.	Support noted.
34874	Bullimore	Object	objection to the policy wording of the Preferred Strategy in general - suggesting there is too much room for short-term economic and social motives to override longer-term environmental necessities - policy wording should be unambiguous, robust and where necessary inflexible	<p>Although LPD2 appears to recognize PCC’s sustainability duties and its sustainability aspirations are reasonable though not as ambitious as necessary, the draft needs to be judged against the fact that planning decisions are not consistent and that both officers and members of planning committees have considerable discretion how loosely worded policies and applied; the LDP is the initial 'bargaining bid' in negotiations with applicants and developers. The LDP may well be PCC’s preferred outcome but it will never be achieved if there is sufficient latitude for short-term economic and social motives to override longer term environmental necessities. Policy wording therefore needs to be unambiguous, robust and, where necessary, inflexible.</p>	PCC recognises the need to develop further policy approaches and refine wording in a number areas prior to the publication of the Deposit Plan.
1491	Dunne	Support	Support 60/40 split	<p>Support the conformity of approach.</p> <p>D. Housing Distribution 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.</p>	Support noted
1491	Dunne	Support	Support the Spatial Strategy	Support - there is (therefore) conformity of approach in relation to the two Plan’s spatial strategies and the approach to cross-boundary settlements.	Support noted

Stakeholder ID	Representor Surname / Organisation	Type of Representation	Representation Summary	Representation Full Text	Officer Response
<u>5. The Strategy</u>					
				<p>Note the approach to infill and rounding off in the National Park Authority's Local Development will be subject to Examination the results of which (through any Matters Arising Changes) will hopefully be available for Pembrokeshire County Council to consider when developing its Deposit Local Development Plan.</p> <p>A. Spatial Strategy It is noted 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. The table below shows the compatibility of approach at higher and lower tiers in both Plans.</p> <p>In terms of additional comment: &#61644; Service Villages/Rural Centres: Some Rural Centres in the Pembrokeshire Coast National Park are listed in the Service Centres in the Council's Plan: Lamphey and Llangwm. These Centres lie almost wholly</p>	
1475	Edwards	Object	Objection to paragraph 5.9 - additional information on the forthcoming SFCA is requested	<p>Page 35 paragraph 5.9 reads "a currently commissioned strategic flood consequences assessment for Pembrokeshire will inform policies and allocations, ensuring highly vulnerable development does not take place in sites which are currently at flood risk or may become vulnerable to flood risk as a result of climate change in the future. Other sources of data will also ensure that areas of land which currently help to reduce overland flow of water remain undeveloped".</p> <ul style="list-style-type: none"> • When will the SFCA be available? • What parts of Pembrokeshire will be included within the SFCA? • What are the other sources of data? • We would request early consultation on allocations after they have been screened and we would wish to comment on any emerging policies as early 	The Strategic Flood Consequences Assessment document is currently being prepared. NRW are on the steering group for the project and will therefore have the opportunity to comment on and shape the final report. NRW will also be invited to comment on all Candidate Sites as part of the assessment process.

Stakeholder ID	Representor Surname / Organisation	Type of Representation	Representation Summary	Representation Full Text	Officer Response
<u>5. The Strategy</u>					
				as possible.	
1475	Edwards	Support	Comment noting the content of paragraph 5.14 regarding changes to layouts and the possible need for lower densities in some housing developments - to accommodate SuDS	Page 37 paragraph 5.14 Drainage and Sustainable Drainage Schemes (SuDS). We note that there may be changes to layouts and a need for lower densities in some housing developments.	Support noted.
1475	Edwards	Support	support for Development Sites SPG (as proposed) and use of Green Infrastructure Study to inform potential allocations and protection of Green Infrastructure	Page 36 paragraph 5.13 Promoting Biodiversity and Green Infrastructure. We welcome the Development Sites SPG and note that the Pembrokeshire Green Infrastructure study has been used to inform potential allocations and the protection of Green Infrastructure.	Support noted.
34643	Evans	Support	Support for the strategy	The general housing strategy is considered acceptable and the rural, urban split generally appropriate. The allowance for sensitive infilling at rural hamlets is welcomed as a means of allowing controlled development outside main settlements that would help sustain rural communities. Comments below relate to development at undefined rural hamlets/ groups of dwellings.	Support noted.
34848	Griffith	Object	Objection - more attention needed to restricted road access in rural area (around East Williamston)	Road Access (restricted) overall development in this rural area	The Settlement Hierarchy will be re-assessed in April 2019 to reflect updated information, the review of bus services approved by PCC Cabinet in March 2019 and to assign greater weight to settlements which have access to the National Cycle Network. Specific constraints for individual settlements will be assessed as part of the Candidate Site assessment process.
34780	Griffith (Clerk)	Object	General comment on provision of future housing - Tiers Cross	We welcome some development but not all listed	The Settlement Hierarchy will be re-assessed in April 2019 to reflect updated information, the review of bus services approved by PCC Cabinet in March 2019 and to assign greater weight to settlements which have access to the National Cycle Network. Specific Candidate Sites will be assessed following this process.
34785	Hunt	Object	Object to the distribution of growth - more growth should be directed to larger settlements and new housing in smaller villages should be restricted.		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

Stakeholder ID	Representor Surname / Organisation	Type of Representation	Representation Summary	Representation Full Text	Officer Response
5. The Strategy				<ul style="list-style-type: none"> • <input type="checkbox"/> The proposal is to retain the existing 60% : 40% urban : rural split of housing allocations , and • <input type="checkbox"/> To introduce Policy GN5 . <p>Both proposals will increase the absolute numbers living in smaller settlements where there are fewer and fewer services and facilities and where access to public transport is limited or non-existent. This objection is particularly relevant to proposed 'hamlets' of Policy GN5.</p> <p>The Access Group has noted that:-</p> <ul style="list-style-type: none"> • <input type="checkbox"/> Two critical issues are the aging population (anticipated increases in the over 65 population of 32% for the Plan area between 2017 and 2033) and reductions in the 0-15 age group of 2% over the same period. (Source:- Content of the LDP Preferred Strategy – Report to Cabinet 3rd December 2018). • <input type="checkbox"/> In 2033 Pembrokeshire's population will be aging with more people aged over 65, and fewer young people. (Source – Living and Working – para 1.15 in LDP) <p>With increases in age comes a need for greater support from others in the community particularly in respect of access as and when needed to transport, including access to public transport. According to a Seminar run by the LDP Team on 23rd January forecast population increase will be a reflection of the level of net migration. With the likelihood that the majority of the population increase will be from the 65+ age groups, it would seem appropriate to limit new build in rural areas to the larger of the settlements rather than those where dependency on the private car for transport is essential. There are, after all, a large number of existing homes in rural areas.</p> <p>PAG is an organisation affiliated to Disability Wales, which promotes facilitating access to sites, to transport and to information for those who are disabled or who have limited mobility.</p> <p>PAG has noted that:-</p> <ul style="list-style-type: none"> • <input type="checkbox"/> the Council itself has just completed a consultation exercise on reducing bus services particularly in rural areas to the degree that many of these services will be so infrequent that most people outside the towns or along key routes will be required to have regular access to a private car for 	<p>most appropriate strategy for Pembrokeshire and how it can deliver sustainability objectives. 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 further information in relation to the Welsh language and Affordable Housing need.</p>

Stakeholder ID	Representor Surname / Organisation	Type of Representation	Representation Summary	Representation Full Text	Officer Response
5. The Strategy				<p>everyday needs employment, shops, health services (including pharmacies) etc. A point particularly relevant to older persons, to the more vulnerable and to the less mobile.</p> <ul style="list-style-type: none"> •□Other services and facilities delivered by both the public and the private sector have been in decline for a number of years and this trend shows no sign of reversing. Examples include the closure of shops, petrol filling stations, primary schools (eg Dale, Moylegrove, Pentlepoir, Mathry, Stackpole, Angle and Hayscastle), libraries, health centres etc. •□There is an inability for health and social care organisations, including the voluntary sector, to meet a growing need by the elderly and vulnerable to provide home care. The existing challenge to meet the needs of these residents will be compounded by having to meet the needs of additional residents in rural locations where greater travel time and therefore increased staff costs are required for each visit. Increasing isolation is already a concern in rural Pembrokeshire and the proposed settlement strategy will compound the problem. <p>The preamble to the Strategic Policies and to the General Policies, together with extracts from the Report to the Cabinet of 3rd December, include the following conflicts between the reasoned argument for the Strategy and its delivery:-</p> <p>Para 5.8 Growth will be distributed across the Plan area in accordance with a spatial strategy which promotes sustainable development. ... A weighting system has been applied which gives greatest weight to those facilities identified as being likely to reduce the need to travel and therefore most likely to be a sustainable location. (Underlining for the purposes of this objection)</p> <p>... In particular greater weighting has been given to the presence of schools, frequent bus services and community halls, with slightly reduced weight given to post offices. (Source – Report to Cabinet 3rd December 2018).</p> <p>The proposed settlement strategies are inconsistent with the underlined statement as the following quotations suggest increasing the number of development opportunities in the less sustainable and unsustainable locations.</p> <p>5.10 A 60/40% Urban / Rural split of housing allocations (sites over 5 units) is proposed. This is broadly in line with the current population split in Pembrokeshire and with the current pattern of allocations between urban and rural locations. The advantages of this approach are that it offers growth opportunities to both urban and rural communities.</p> <p>5.12 In other rural locations, there will be limited opportunities for sensitive infilling where sites consist of 1-2 dwellings. In locations with a grouping of 20 or more dwellings, this can be for market housing.... In locations with a grouping of less than 20 dwellings, infill opportunities on sites for 1-2 dwellings will be for local needs affordable housing.</p> <p>Changes in the type of housing permitted will be at the lowest levels of the Settlement Hierarchy are proposed – LDP2 will permit market housing in these locations (currently only local needs Affordable Housing is</p>	

Stakeholder ID	Representor Surname / Organisation	Type of Representation	Representation Summary	Representation Full Text	Officer Response
<u>5. The Strategy</u>					
				<p>permitted). A 'clusters' concept has been used to also identify lower level settlements (Local Villages) which can accommodate greater growth because of their relationships to more sustainable settlements. The Preferred Strategy also proposed a limited infill policy, to apply in locations outside settlement boundaries. Under the current LDP no development is permitted in these locations. (Source – Report to Cabinet 3rd December 2018). (Underlining for the purposes of this objection).</p> <p>It is PAG's contention that for the reasons given above (Commencing "PAG has noted" with 3 bullet points) that</p> <ul style="list-style-type: none"> • <input type="checkbox"/> An increase in housing allocations / potential permissions should be directed to the larger and more sustainable settlements (for example a 65:35% split rather than the maintained 60:40) • <input type="checkbox"/> New housing in the smaller villages and unsustainable locations (particularly as proposed in Policy GN5) should be restricted as at present – NOT relaxed. <p>A scattered settlement pattern also generates additional vehicle journeys which is contrary to efforts to mitigate climate change. The Well-being of Future Generations (Wales) Act 2015 contains as one of its 7 Goals "A prosperous Wales", which is described as "An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); (Underlining for the purposes of this objection)</p>	
2402	Mathieson	Object	objection to the lack of a boundary for Sutton village	<p>Sutton has no village boundary map (although there are sites in the village which have had planning consent – now probably lapsed) . This is a change from previous plans. It would be helpful to know if this is a deliberate decision or an oversight. Should it have one in the future it would be good to identify the newly registered Village Green (Pictured below) just on the northern edge of the village as public open space within the village.</p>	<p>No settlement boundaries have yet been identified for LDP 2. LDP 1 boundaries (where they exist) have been shown on the Candidate Sites register for information. Sutton is a very small settlement with very limited services. As such it is likely to be classed as a hamlet rather than identified in the settlement hierarchy for the LDP.</p>
1507	Newey	Object	Unclear how Welsh language has influenced scale and distribution of housing within settlements to the north of the County.	<p>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.</p>	<p>No housing allocations have yet been identified, these will be included at the Deposit stage. In terms of the strategy - cluster local villages have been identified as a specific approach to promote the Welsh language. Policy SP 5 identifies in paragraph 6.18 that development will be proportional to the size of a settlement, its function and character, and based on current service provision. Policy SP 17 Welsh Language sets out how development will be managed sensitively</p>

Stakeholder ID	Representor Surname / Organisation	Type of Representation	Representation Summary	Representation Full Text	Officer Response
<u>5. The Strategy</u>					
					in areas where Welsh language has a significant role. Detailed Supplementary Planning Guidance on allocations will be produced at the Deposit Stage which will identify any specific requirements for phasing or other mitigation measures on individual sites.
1507	Newey	Object	Deposit Plan must set out site specific details for allocations, information on viability, phasing timescales, key infrastructure requirements. It must also demonstrate spatial distribution of housing land supply for each settlement and settlement tier and include a housing trajectory and housing land supply table.	<p>The Deposit Plan should also set out site specific details for allocations and include information on viability, general phasing timescales, key infrastructure requirements and evidence of commitment from developers.</p> <p>To demonstrate delivery and implementation of housing the Deposit plan must:</p> <ul style="list-style-type: none"> • <input type="checkbox"/> Identify the spatial distribution and components of housing land supply as allocations, commitments and windfall sites (small and large) for each settlement and settlement tier in which they will be delivered. • <input type="checkbox"/> Include a housing trajectory and housing land supply table within the LDP appendices, with a cross-reference in the reasoned justification to Policy (see guidance in the LDP Manual, edition 3). 	PCC recognises the need to develop further evidence and a specific policy approach on this issue within the Deposit Plan.
1507	Newey	Object	Demonstrating delivery of strategy and key allocations will be critical at Deposit Stage.	Demonstrating delivery of the strategy and key allocations will be critical and this should be supported by your Authority's evidence in the Deposit plan. Further comments are set out in the annex to this letter with additional guidance contained in the Draft LDP Manual (3rd edition).	PCC recognises the need to undertake further evidence work in a number of technical areas including deliverability to inform the development of the Deposit Plan.
1507	Newey	Object	Need major consideration to be given to the sustainable transport hierarchy in preparation of the strategy.	PPW10 gives greater emphasis to sustainable transport, including ensuring the location and design of new development reduces the need to travel and prioritises walking, cycling and public transport. The sustainable transport hierarchy should be a major consideration in the preparation of the strategy, directing development to locations most accessible by public transport, as well as sites which can be readily connected to existing active travel routes or future networks. This should be done from the outset.	The Settlement Hierarchy will be re-assessed in April 2019 to reflect updated information, the review of bus services approved by PCC Cabinet in March 2019 and to assign greater weight to settlements which have access to the National Cycle Network.
1507	Newey	Object	Need to evidence why 60/40 is the most appropriate option.	The preferred option of a 60% / 40% urban / rural split for housing growth is in line with the current population distribution. However, the evidence to justify why this option is the most appropriate, when considered against PPW and the SA does not support the chosen option. Option 1, a slightly more concentrated approach (70/30 split) is more sustainable (as set out in the Council's evidence) and would have an increased potential to reduce trip movements by private cars and support walking, cycling, public transport and reduce pollution.	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 sustainability objectives. 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

Stakeholder ID	Representor Surname / Organisation	Type of Representation	Representation Summary	Representation Full Text	Officer Response
<u>5. The Strategy</u>					
					on the rural economy of a more urban approach and also further information in relation to the Welsh language and Affordable Housing need.
34655	Peters	Support	Support the general strategy	The general housing strategy is considered acceptable and the rural, urban split generally appropriate. The allowance for sensitive infilling at rural hamlets is welcomed and would help sustain rural communities.	Support noted.
34411	Reynolds	Object	Reference needed to PDL	Within the PS there is only a limited reference to developing previously developed/ brownfield land. Prioritising these lands for development is considered an important aspect of any emerging LDP. Equally any such sites should demonstrate the reasoning why such lands should not be maintained for business purposes (see specific comments below in relation to Candidate site 336).	Consideration will be given to including additional references to PDL within the Deposit Plan, however LDPs are required to not repeat national planning policy and therefore it is likely that the Plan will include a cross-reference to appropriate sections of PPW 10, rather than repeating this.
34411	Reynolds	Object	Consideration of Sustainable Travel is complicated and needs to be evidenced	<p>The PS notes sustainable travel as a key item for consideration. As noted in recent press articles; rural bus services are in constant review in Pembrokeshire. It is recognised that limited rural services does focus general sustainable assessments to service towns and villages. However specific consideration of site proximity to services as well as an understanding of the nature and number of services needs to be considered against any specific site assessment. It would be interesting to see what long-term forecasts or discussions with service providers has, or will be undertaken, for the provision of bus services over the plan period.</p> <p>The walkability of sites to key services, or options to upgrade and improve the pedestrian network within the proximity of sites (as is the case with the Riverlea site), can also assist informing LDP allocations (either through new public rights of way, or creation of new public pedestrian walkways). Guidance values for “walkable” services (e.g. bus stops, schools, shops etc...) vary between 800m and 2000m.</p>	PCC recognises the need to undertake further evidence work in a number of technical areas to inform the development of the Deposit Plan.
34411	Reynolds	Support	Support for the move to greater number of small and medium sized housing sites	<p>Scale of development and strategic sites</p> <p>As noted in the PS documentation, development sites are often taken forward by small to medium scale developers within the locality. Across the south Wales region, larger development companies, such as Taylor Wimpey (from our experience/ commercial knowledge) are largely absent. Hence large-scale allocations are often slow to come forward (if at all), in part due to; funding requirements for large scale developments (and limited interest in the West Wales market outside of coastal areas); lower Gross Development Values (GDV), and; recent increased costs from the installation of sprinkler systems - impacting on the viability of existing</p>	Support noted.

Stakeholder ID	Representor Surname / Organisation	Type of Representation	Representation Summary	Representation Full Text	Officer Response
5. The Strategy				<p>allocated sites. Local economic factors are also a key item to consider e.g. lower levels of regional income, impacting on general affordability of homes (as compared to the national average). This has restrained many national development companies from larger housing allocations, outside of the South Wales region (generally focussing their development sites to Cardiff and neighbouring authorities). Deliverability of large strategic sites is therefore a key concern that the LPA needs to address when allocating a mix of housing sites in Pembrokeshire. It is noted that this would shift the LPA's focus of development, to a greater number of small to medium scale sites, supporting local development companies or self-builders (which is inferred within the PS).</p> <p>The financial impact of Brexit (and reduction in funding for developments across South and West Wales) is also apparent within the current market – which is a key risk to the deliverability of large or strategic housing sites over the plan period.</p> <p>The definition of “sustainability” is constantly evolving. The Country Landowners Association (CLA) has undertaken some interesting research on rural housing allocations across England and Wales (on what is, or can be construed as sustainable). NB I am seeking to gain access to this research to disseminate with the LPA. The focus of the research notes that with technological changes (e.g. internet services) and an increase in flexible and homeworking patterns; greater consideration of these changes should be reflected within rural areas when reviewing housing allocations. Further assessment of the longterm positive impacts from expanding rural towns and villages also needs to be undertaken - especially where new allocations (from an increased population) can support existing businesses, such as local shops, public houses, general supporting services, as well as public transport services.</p> <p>In light of the above, an arbitrary assessment of rural and semi-rural candidate sites (focussed on distance to service centres or villages) is considered to be a semi out-dated means of assessment - when other key demographic and lifestyle changes are also considered. It would be beneficial to understand how the LPA has considered the above and below matters in more detail. Particularly, what input can be derived from internet service providers/ provision, across the County, as well as the impact of any findings on the PS and emerging LDP when assessing rural housing allocations. This may also impact on the LPA's assessment for the provision of “live-work” developments or small-scale housing sites in the emerging LDP.</p>	
1564	Sinclair	Object	Object to the level of growth proposed for Narberth		As set out in paragraph 6.18 (POLICY SP 5) development will be proportional to the size of a settlement, its function and character and based on current service

Stakeholder ID	Representor Surname / Organisation	Type of Representation	Representation Summary	Representation Full Text	Officer Response
<u>5. The Strategy</u>					
				<p>Narberth.</p> <p>Reference is made to Narberth as an attractive rural market town (para 6.35) and that "Development in Narberth should maintain the attractiveness of the experience of living in and visiting the town".</p> <p>CPRW has concerns that the scale of existing and proposed dwellings which is being considered will significantly diminish the quality of life in the town, a concern which is particularly directed at the increasing congestion through the High Street, Spring Gardens and St James St - and which is likely to have implications for any emergency traffic movements. There are no proposals to divert the A478 away from the town centre, nor are there any proposals for additional car parking facilities to support the projected increased local demand for such provision.</p>	provision.
1564	Sinclair	Object	Object to the 60%/40% split as inconsistent with Vision and Objectives	<p>Having read the Pre-Deposit Consultation Documents CPRW Pembrokeshire is of the opinion that a number of the proposed policies within the Replacement LDP are inconsistent with the Vision and a number of the Objectives of the Deposit Draft and therefore consider that LDP2 is not 'sound'.</p> <p>LDP2 Vision ... where the challenges of rurality and climate change are successfully tackled....(para 2.2)</p> <p>LDP2 Objectives include ...</p> <p>A) <input type="checkbox"/> Mitigate and respond to the challenges of Climate Change. (Para 2.4)</p> <p>Key elements of the Strategy include the following extracts:-</p> <p>Para 5.8 Growth will be distributed across the Plan area in accordance with a spatial strategy which promotes sustainable development. ... A weighting system has been applied which gives greatest weight to those facilities identified as being likely to reduce the need to travel and therefore most likely to be a sustainable location. (Which CPRW supports) [Underlining for the purposes of this objection]</p> <p>5.10 A 60/40% Urban / Rural split of housing allocations (sites over 5 units) is proposed. This is broadly in line with the current population split in Pembrokeshire. The advantages of this approach are that it offers growth opportunities to both urban and rural communities.</p> <p>5.12 In other rural locations, there will be limited opportunities for sensitive infilling where sites consist of 1-2 dwellings. In locations with a grouping of 20 or more dwellings, this can be for market housing.... In locations with a grouping of less than 20 dwellings, infill opportunities on sites for 1-2 dwellings will be for local needs affordable housing.</p> <p>... In particular greater weighting has been given to the presence of schools, frequent bus services and community halls, with slightly reduced weight given to post offices. (Source – as paragraph below).</p> <p>Changes in the type of housing permitted will be at the lowest levels of the Settlement Hierarchy are proposed – LDP2 will permit market housing in these locations (currently only local needs Affordable Housing is permitted). A 'clusters' concept has been used to also identify lower level settlements (Local Villages) which can accommodate greater growth</p>	<p>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 sustainability objectives. 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 further information in relation to the Welsh language and Affordable Housing need. The strategy aims to address the issues identified in the Preferred Strategy and to delivery the Vision and Objectives. Underneath each Strategic Policies text identifies which key issues and objectives they deliver.</p>

Stakeholder ID	Representor Surname / Organisation	Type of Representation	Representation Summary	Representation Full Text	Officer Response
5. The Strategy				<p>because of their relationships to more sustainable settlements. The Preferred Strategy also proposed a limited infill policy, to apply in locations outside settlement boundaries. Under the current LDP no development is permitted in these locations. (Source – Report to Cabinet 3rd December 2018).</p> <p>CPRW fails to understand how the linkage between the stated and urgent need to Mitigate and respond to the challenges of Climate Change (Objective A) or to challenge rurality and climate change (part of The Vision), as reinforced by para 5.8 above, is met by proposing:-</p> <ul style="list-style-type: none"> • <input type="checkbox"/> a strategy which maintains the status quo of 60% urban and 40% rural rather than seeking one of 65% urban and 35% rural for new build. • <input type="checkbox"/> policies which promote additional market and affordable housing in “other rural locations” (para 5.12 and Policy GN5) <p>at a time when:-</p> <ul style="list-style-type: none"> • <input type="checkbox"/> the Council itself is undertaking a consultation exercise on reducing bus services particularly in rural areas to the degree that many of these services will be so infrequent that most people outside the towns or along key routes will be required to have regular access to a private car for everyday needs employment, shops, health visits etc. • <input type="checkbox"/> Other services and facilities delivered by both the public and the private sector have been in decline for a number of years and this trend shows no sign of reversing. Examples include the closure of shops, petrol filling stations, primary schools, (for example Dale, Moylegrove, Pentlepoir, Mathry, Stackpole, Angle and Hayscastle), libraries, health centres etc. (The LDP Seminar at County Hall on 23rd January noted a recent closure of a facility / service at Cilgerran) • <input type="checkbox"/> There is an inability for health and social care organisations, including the voluntary sector, to meet a growing need by the elderly and vulnerable to provide home care. The existing challenge of meeting the needs of these residents will be compounded by having to meet the needs of additional clients in rural locations where greater travel time and therefore increased staff costs are required for each visit. • <input type="checkbox"/> There is an acknowledged need on a national scale to reduce mileage by all vehicles whether they are petrol, diesel or electric due to gaseous and particulate omissions and the need to generate additional electricity to drive “carbon neutral” vehicles. • <input type="checkbox"/> Sewage disposal in scattered dwellings and in ‘hamlets’ is predominantly by septic tanks and sealed cess pits. Such answers are not the preferred solutions as contamination of ground water can occur if such systems are not regularly maintained / emptied. Ground water is the supply source for aquifers which in turn supply drinking water. • <input type="checkbox"/> Affordable housing (even for local needs) should, wherever possible, be concentrated in affordable locations; and CPRW suggests that such locations would be close to existing services and facilities that would include shops, schools, health centres (including surgeries and pharmacies), community halls and (reasonably frequent) public transport and not in 58 Local Villages and certainly not in the Hamlets of proposed 	

Stakeholder ID	Representor Surname / Organisation	Type of Representation	Representation Summary	Representation Full Text	Officer Response
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5. The Strategy

GN5.

In the context of reducing the need to travel, one of the 7 Goals of the Well-Being and Future Generations (Wales) Act 2015 is “A Prosperous Wales” where this Goal is described as “An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change);”

Nor are we sure how the challenges of rurality are either met or even mitigated by allowing a more dispersed pattern of additional housing in ‘lower level’ settlements than under the current LDP1. LDP1 saw a welcome and strong determination to limit the number of new dwellings in minor settlements. CPRW would have thought that reversing adopted policy would have compounded problems of rurality as more new dwellings are very likely to be permitted in unsustainable locations – for example south of Ludchurch where recent refusals have been shown on the Candidate Sites map as “Amber” suggesting disappointed applicants should have another go as the LPA has decided what was previously unsustainable is now sustainable. (“Amber” Candidate sites comprise 093,157,159).

Planning Policy Wales Edition 10 of December 2018 para 4.2.24 states:-
 “In the open countryside, away from established settlements recognised in development plans or away from other areas allocated for development, the fact that a single house on a particular site would be unobtrusive is not, by itself, a good argument in favour of permission; such permissions could be granted too often, to the overall detriment of the character of an area.”

Comments have been made in the Feedback sections of the Report that there is support for such a more liberal LDP2. It is also true that in a previous seminar attended by CPRW many voiced concerns that, with the Council itself contracting service provision in terms of both funding and physical presence, any new development should be focussed on the established urban centres rather than on the rural settlements within the County and certainly not on isolated groups of dwellings.

CPRW therefore suggests that the Council is being inconsistent as:-

- on the one hand PCC, as a partner in the County’s Community Plan and reflecting the Goals in the Well-being of Future Generations Act, it is driving a programme of concentration on key services and centres, whilst
- on the other in the LDP2 (draft) changing its attitude to and allowing development in unsustainable locations.

Conclusion.

That there is a fundamental inconsistency between:-

- on the one hand the Vision for LDP2 and the associated Objective A of LDP2 and,
- on the other hand both the continuation of the intended 60% urban : 40% rural split of housing allocations (ie no change in the strategy whilst

Stakeholder ID	Representor Surname / Organisation	Type of Representation	Representation Summary	Representation Full Text	Officer Response
5. The Strategy				<p>recognising in the preamble the need for change), together with the introduction of Policy GN5 which facilitates small scale developments in unsustainable locations.</p> <p>Neither the overall strategy governing the distribution of new development nor specifically GN5 assists in the delivery of a sustainable vision which is compatible with the challenges of either climate change or meets the challenge the challenges of rurality.</p> <p>CPRW would suggest that a 65:35% split urban:rural would be more a appropriate ratio under which to meet the challenges of climate change and the problems of rurality</p> <p>Example.</p> <p>CPRW is aware of one situation (and this certainly not unique) where over the last twenty years the number of properties has doubled despite the fact that:-</p> <ul style="list-style-type: none"> • <input type="checkbox"/> All houses use septic tanks / sealed cess pits. • <input type="checkbox"/> There are no local buses (the nearest route is the 381 which is circa 3km away). • <input type="checkbox"/> As a result all households have at least one car • <input type="checkbox"/> All have courier deliveries • <input type="checkbox"/> There have been complaints that street lighting should be improved, bus shelters built for children catching the school bus and for broadening the area of speed restrictions as the local population increases, and there are no pavements – examples of why such locations are not sustainable. <p>However, and appropriately, during the period of the current LDP two planning applications for residential properties have been refused reflecting the unsustainable nature of this site.</p> <p>LDP2 now proposes a possible reversal of a successful policy in what continues to be a non-sustainable location.</p>	
1737	Sinnett	Object	Growth should be higher	<p>The Preferred Growth Option of delivering 425 dwellings per year is objected to as it would result in the Plan failing the tests of soundness in that it does not fit (i.e. by not having regard to national policy and being inconsistent with regional plans) and is not appropriate (i.e. by not enabling the delivery of a strategy that is positive and aspirational). By comparison, the preferred level of growth would result in a decrease of 147 homes per annum, 2,205 homes over the Plan period. The Council's Annual Monitoring Report indicates that the Council's Housing Land Supply has largely exceeded the minimum requirement set in TAN 1 to maintain a five-year supply of housing land. This indicates the previous housing requirement set in the current LDP is deliverable – and therefore accords with Planning Policy Wales (Edition 10) (PPW) Paragraph 4.2.4 PPW Paragraph 4.2.6 confirms that Welsh Government local authority level Household Projections for Wales "... will form a fundamental part of the evidence base for development plans" in order to identify an appropriate strategy for the delivery of housing in the plan area. They are projections that do not account for wider policy and economic considerations. Accordingly, having regard to the specific context and</p>	<p>No change proposed to the level of growth identified in the Preferred Strategy. As set out in the Preferred Strategy the growth level is slightly above that derived from a 15 year migration trend and in the middle of average completion levels across the last 5 and 10 years. Because the figure is within the range delivered historically by the local building industry, the Authority is confident that it represents a deliverable target. The slightly higher figure will support greater levels of affordable housing and help to ensure a more balanced population profile by 2033.</p>

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5. The Strategy				<p>circumstances apparent in Pembrokeshire, it would not be appropriate to consider the demographic trend scenarios (Options 1 to 3).</p> <p>In respect of setting the housing requirement, PPW Para 4.2.6 states: “Appropriate consideration must also be given to the wider social, economic, environmental and cultural factors in a plan area in order to ensure the creation of sustainable places and cohesive communities.”</p> <p>In light of the above, support is provided for Growth Option 6: Dwelling – Led (Current LDP) Scenario. The level of growth proposed should be in line with this Option for the reasons outlined below.</p> <p>The dwelling-led (Current LDP) scenario results in the highest population growth outcomes, driven by increased net migration flows required to support the annual change in dwellings. The LDP (2013) target of +572 dpa would suggest a population growth rate of 16.6% over the 2017–2033 plan period.</p> <p>Issues of affordability are prevalent in Pembrokeshire. Housing is now significantly less affordable than in the late 1990s, which has caused some suppression in household formation. Pembrokeshire’s median wage is the second-lowest in Wales (State of the Nation 2017: Social Mobility in Great Britain). Despite this, across Welsh counties, Pembrokeshire saw the highest rise at 8.1% in the last quarter of 2017 (Principality/Aca Data, Land Registry, January 2018). Levels of need for Affordable Housing are still acute in Pembrokeshire with a need for 1,641 affordable homes a year (Local Housing Market Assessment, 2014) (significantly more than the number of market dwellings built each year). As identified within the 2016-2017 Annual Monitoring Report (AMR) (Page 27), utilising the current LDP requirement “may reduce some of the historic pressure on housing costs that might be resulting in lower rates of household formation than would otherwise be expected”. Accordingly, the continuation of housing development at a significant level (at least in line with current LDP growth levels) is required to make any substantive difference to house price affordability.</p> <p>By way of wider context, the Barker Review of Housing Supply (2004) indicated that an 86% increase in house building would be required to bring house price inflation down to the European average: “Achieving the desired improvement in the housing market would, it was asserted, require an additional 120,000 housing starts per year on top of the 140,000 in 2002/3, taking the annual total to 260,000. According to the Review’s modelling, this scenario would see between 5,000 and 15,000 newly formed households priced into the market in each year between 2011 and 2021.”</p> <p>Welsh Government’s latest release (30 January 2019) on ‘Estimates of housing need in Wales at a national and regional level (2018-based)’ (‘article’) advises that these estimates replace the previous estimates of housing need in Wales produced by Alan Holmans and published by Public Policy Institute for Wales (PPIW) in 2015. Holman’s principle estimated a need of 8,700 homes a year over the</p>	

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5. The Strategy				<p>complete twenty-year period 2011-2031, totalling an additional 174,000 homes needed. Holman's alternative projection gave rise to a higher estimate of need and demand of 240,000 homes over the same period. The new estimates presented in WG's article estimate a need of 5,700 units a year (based on a central estimate) over a twenty-year period 2018-2038, totalling an additional 114,000 new homes needed. We consider WG's Upper 5 Year Estimate should be used in order to take into account economic considerations including the Swansea Bay City Deal. Based on WG's Upper 5 Year Estimate there is an estimated need of 7,542 new homes a year over the complete twenty-year period (2018-2038) this totals an additional 150,840 homes needed. While this is lower than Holmans projections it is significantly higher than the 2014-based Welsh Government Household Projections which indicate a growth of circa 86,000 homes within the region over the 25-year period (2014 to 2039).</p> <p>As this article has only just been released by the WG, we have not had an opportunity to fully scrutinise the content. We therefore reserve the right to comment further on these new estimates of housing need in Wales. We also note that the HM Treasury, Autumn Budget Statement (2017) commented that:</p> <p>"Increasing housing supply guards against macroeconomic instability. House prices tend to rise faster in environments with lower responsiveness of new housing supply. Cross-country studies show that lower house price variability is associated with lower variability in inflation, interest rates and real incomes"</p> <p>The importance of housing in underpinning the aspirations of the Swansea Bay City Deal (which Pembrokeshire County Council form a part of) should also not be underestimated. The City Deal comprises a £1.3 Billion investment; £1.8 Billion boost to the economy; and seeks to create 10,000 new jobs. As part of the City Deal, Pembroke Dock Marine is proposed as a £76m specific investment intervention –stating:</p> <p>"This project will unlock local growth and regeneration opportunities in the area, exploring marine and other energy sectors. The ambition will be that this project will create a cluster of resources, knowledge and capabilities in marine energy and other energy sectors to accelerate technological development and lead to indigenous business growth, new start up business and an attraction for international business in this field."</p> <p>Housing growth is imperative to underpin the job creation sought through the City Deal (not least at Pembroke Dock). Further modelling would be required to forecast the necessary level of growth in homes required to balance with job growth, but a simplistic method would be to assume that 1 job equates to one household – the rationale being that typically a home is occupied by c.2.1 people, of which 50% are economically active. On the basis of the +10,000 new jobs sought by the City deal, and assuming this is spread over a 20-year period, it would result in job growth of +500 per annum. This would be over and above (in addition to) the Welsh Government Household Projections and, the significant level of investment</p>	

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<u>5. The Strategy</u>					
				<p>was not accounted for at the time of adoption of the current LDP. Notwithstanding the City Deal and in any case, the construction sector is projected to have the greatest number of employment numbers in 2025 when compared with other sectors (Labour Market & Curriculum Overview for Pembrokeshire, PCC, July 2015). It is moreover projected to have the greatest increase in projected employment and gross value added (GVA) to 2025. Strong local clusters of construction employment within Pembrokeshire is identified as a strength within the Economic Profile Report commissioned by PCC (June 2015). Integral to the growth of the construction sector is the provision of housing - both to provide accommodation for construction workers and to support the projected job creation. Reducing the rate of housing growth currently targeted and being delivered would represent a significant risk to the buoyancy of this sector and conflict with the economic aspirations of the City Deal (which is of utmost importance in the context of Pembrokeshire). In summary, for the reasons outlined above, the Preferred Growth Option is objected to as it is clear that Growth Option 6: Dwelling – Led (Current LDP) Scenario is the most appropriate to utilise for LDP 2, owing to:</p> <ul style="list-style-type: none"> a. Planning policy dictates that the Welsh Government projections should form only one element of the 'key evidence' in respect of assessing housing requirements, and that there are a number of specific contextual, policy and economic considerations which need to be accounted for in the context of Pembrokeshire; b. The current LDP is delivering the rate of housing growth currently targeted. Stepping down from this level would represent a serious risk of triggering enhanced issues of affordability, which already comprises a significant pressure to the local population; c. Growth at current levels is required to support the construction sector (which is the greatest employer in Pembrokeshire); however, the current LDP does not account for the Swansea Bay City Deal. Significant housing growth (over and above current levels targeted) will be required to underpin the 10,000 new jobs targeted to be created within the region, a significant number of which will need to be accommodated and housed within Pembrokeshire due to the commitment for investment specifically in Pembroke Dock. 	
1737	Sinnett	Support	Support the Strategy	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.	Support noted.
1737	Sinnett	Support	Support 60/40 split	We support the preferred spatial option of delivering Option 2 (60% Urban and 40% Rural) which includes housing allocations within Service Centres. Letterston remains a Service Centre, which we support.	Support noted.
1737	Sinnett	Support	Support for the Strategy	We also support the approach to provide a mix of housing allocation sizes with the overall amount of housing identified being proportionate in scale	Support noted.

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<u>5. The Strategy</u>					
				to the size and level of services existing within the settlement.	
2497	Wooles	Object	Object to Overall Growth Level	The strategy claims by producing more housing, more jobs would become available. All building work is tendered out for the cheapest price and that normally means the work will go to companies based near Swansea, Cardiff and not local companies. The strategy has been written with blinkered views in a dream world and not reality.	Support noted.
<u>Executive Summary</u>					
2603		Support	Support for 60/40 split	We note from the Executive Summary that there is 6,800 new homes proposed over the plan period between the years 2017 – 2033, with a 60%/40% urban/rural split. We welcome this proposal for the majority of growth to be focused within urban areas. From our perspective, the provision and capacity of our water and sewerage infrastructure is more prevalent within urban areas.	Support Noted.
<u>Glossary</u>					
1564	Sinclair	Object	Object to the lack of definition of local needs affordable housing	The Glossary accompanying LDP2 does not define Local needs affordable housing, nor are the terms “Exception Sites” or “Rural Enterprise” as a justification for a dwelling in the countryside included. It would appear that there is some overlap	Detailed policies on affordable housing will be included in the Deposit plan. Further details will also be set out in an Affordable Housing Supplementary Planning Guidance document at Deposit stage which will clarify how need including local need will be assessed.
1564	Sinclair	Object	Object to the lack of definition of 'Rural Enterprise'	The Glossary accompanying LDP2 does not define Local needs affordable housing, nor are the terms “Exception Sites” or “Rural Enterprise” as a justification for a dwelling in the countryside included. It would appear that there is some overlap	A definition will be added to the glossary for clarification.
1564	Sinclair	Object	Object to the lack of definition of 'Exception Sites'	The Glossary accompanying LDP2 does not define Local needs affordable housing, nor are the terms “Exception Sites” or “Rural Enterprise” as a justification for a dwelling in the countryside included. It would appear that there is some overlap	No change required. The Deposit Plan will include a specific policy on Exception sites for affordable housing which should address this point.
<u>GN.1 General Development Policy</u>					
2603		Support	Support Criterion 6	We welcome the inclusion of criteria six which seeks to ensure there is necessary and appropriate service infrastructure in order for development to be permitted.	Support noted.

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<u>GN.1 General Development Policy</u>					
1494	Ashby-Ridgway (Nathaniel Lichfield & Partners)	Support	Support paragraph 7.8.	<p>Paragraph 7.8 of the Preferred Strategy states: “Where there are concerns that a proposal would cause harm to health and safety through contamination, adverse impact on air quality, land instability, flooding or erosion, professional advice will be sought from the relevant authority. Where such concerns relate to the fluvial or coastal flooding and / or erosion, the provisions of the relevant Shoreline Management Plan will inform consideration of the health and safety issues. In some instances, anticipated on-site or off-site problems may render development inappropriate; in other cases, development may be possible if mitigation is available, to make the proposals resilient to the identified problems.”</p> <p>The approach of paragraph 7.8 is endorsed where it refers to concerns that a proposal would cause harm to health and safety through flooding or erosion, the provisions of the Shoreline Management Plan will inform consideration of the health and safety issues.</p> <p>This approach is consistent with PPW (Ed. 10) which states that the priorities contained within Shoreline Management Plans should influence and inform the preparation of development plans (paragraph 6.5.16). It also states at paragraph 6.5.17 that “Shoreline Management Plans will influence whether development itself can be justified or how it should be designed...” (paragraph 6.5.17)</p>	Support noted.
34874	Bullimore	Object	Objection to policy GN.1 - wording is insufficiently robust and therefore may fail to deliver the plan's ambitions.	However, the insufficiently robust subsequent development policies risk failing to deliver these ambitions.	No change proposed at this stage. However further consideration will be given to the wording of specific policies prior to the publication of the Deposit Plan.
34874	Bullimore	Support	Support in general for the criteria in policy GN.1, particularly criteria 4 and 5.	The criteria in GN.1, General Development Policy, are generally welcome, particularly criteria 4. “respects and protects the natural environment” and 5. “would incorporate sustainable transport and accessibility principles”.	Support noted.
1491	Dunne	Object	Suggest wording change to Criterion 3	<p>The term ‘significantly adversely affect landscape character ...’ could usefully be re-considered to ensure the criterion is drafted in a manner appropriate to the significance of the National Park designation (see paragraph 6.36 of Planning Policy Wales 10).</p> <p>A suggested wording that allows a qualitative judgement to be made would advise an ‘unacceptable adverse effect’, i.e. an unacceptable harmful impact that cannot be satisfactorily mitigated’.</p>	Change proposed. Agree. A change to criterion 3 of GN.1 is proposed, to read 'It would not cause an unacceptable adverse effect (a harmful impact that cannot be satisfactorily mitigated) on landscape character, quality or diversity, including the special qualities of the Pembrokeshire Coast National Park and neighbouring authorities'.

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<u>GN.1 General Development Policy</u>					
1491	Dunne	Support	Support GN.1	<p>Support in principle. Support Policy SP1 Creating Sustainable Places, GN1 General Development, GN2 Sustainable Design and GN4 Resource Efficiency and Low Carbon energy Proposals.</p> <p>Climate Change The Authorities have a shared understanding of the need to plan for climate change and to mitigate its impacts and to provide for high quality design to ensure that new development is sustainable.</p>	Support noted.
1475	Edwards	Object	Objection to policy GN.1, paragraph 7.8 - where other (non housing) allocations are located within the flood zone, NRW would wish to comment on these and advises that the SFCA should be used to inform such allocations.	You also state that a small number of other allocations are located within C1 or C2 flood zones. We would wish to comment on these allocations, in addition the SFCA should also be used to inform such allocations.	No change proposed but further matters to consider prior to the development of the Deposit Plan. An SFCA for Carmarthenshire and Pembrokeshire has been commissioned and is underway. NRW are on the Steering Group and will also separately be consulted on Candidate Sites. The reference to the small number of other allocations located within the C1 and C2 flood zones is taken forward from LDP 1. The allocations will be confirmed when the Deposit LDP 2 is published. It is not known at present whether the small number of non-residential LDP 1 allocations in the C1 and C2 flood zones will be carried forward into LDP 2.
1475	Edwards	Object	Objection to policy GN.1, paragraph 7.5 - request to delete a sentence regarding LPA consultation with NRW prior to authorization of development on sites affecting Ancient or Semi-Natural Woodland (NRW does not comment on these schemes as part of the planning application process).	Page 77 paragraph 7.5 states "The Local Planning Authority will consult with NRW prior to authorising development on sites affecting Ancient or Semi-Natural Woodland". Please remove this sentence as it is incorrect. NRW do not comment on these schemes as part of the planning application process.	Change proposed. Agree. This sentence, within paragraph 7.5, will be deleted for the Deposit LDP 2.
1475	Edwards	Support	Support for policy GN.1, paragraph 7.8, recording that no housing allocations being identified within C1 or C2 flood zones. (Note - this is the LDP 1 position - LDP 2 allocations won't be known until Deposit stage).	Page 78 paragraph 7.8. We welcome that fact that no housing allocations have been identified within C1 or C2 flood zones. TAN 15: Development and Flood Risk is under review and once finalised will refer to NRW's Flood Zones 2 and 3. Please could you change the wording to reflect this. Also, this should include no allocations for emergency services in these zones.	No change proposed, but matters to check prior to finalising the Deposit plan. Support noted. Once the revised TAN 15 is published and the references change to Flood Zones 2 and 3, PCC will change the policy text. PCC will ensure that the Deposit LDP 2 does not make housing allocations in the C1 or C2 flood zones. It will also take account of the additional comment that allocations for the emergency services should not occur in

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<u>GN.1 General Development Policy</u>					
					these zones.
2841	Melanie	Object	Objection to policy GN.1 – land instability is referenced in paragraph 7.8, but this issue should be referred to in the main body of the policy text.	Comment 2 – We note that the supporting text for Policy GN.1 – General Development Policy, specifically paragraph 7.8 states that where there are concerns that a proposal could cause harm to issues such as land stability then professional advice should be sought. However, we are disappointed that this is not explicit in the wording of the policy and it is requested that consideration be given to amendments to the wording of this policy in order to include the issues referred to in the supporting text into the main body of the policy itself.	No change proposed. Policy GN.1 has been drafted to capture the many detailed considerations that need to be taken account of in taking forward a development project under broad headings. Land instability forms one of the considerations under the 'unacceptable harm to health and safety' criterion (7) with the reasoned justification in paragraph 7.8 providing further detail on the many issues captured under this broader heading. PCC has used this approach for LDP 1 and it has generally proved successful. If PCC was to include a separate criterion for land instability, then it would need to take a similar approach for a range of other matters, making the policy unwieldy and difficult to use and potentially increasing the length of the Plan. General advice from Welsh Government is to ensure that Plans are succinct and the suggested change would not help in that respect.
<u>GN.2 Sustainable Design</u>					
34874	Bullimore	Object	objection to policy GN.2 - criterion 3 is too flexible and imprecise	Likewise, the wording of GN.2, Sustainable Design, "Development will be permitted where relevant criteria are met 3. It incorporates a resource efficient and climate responsive design" appear to be too flexible and imprecise.	No change proposed to the Preferred Strategy. The policy is designed to be flexible. More prescriptive guidance will follow in the form of a Design SPG.
1491	Dunne	Support	Support GN.2	Support in principle. Support Policy SP1 Creating Sustainable Places, GN1 General Development, GN2 Sustainable Design and GN4 Resource Efficiency and Low Carbon energy Proposals. Climate Change The Authorities have a shared understanding of the need to plan for climate change and to mitigate its impacts and to provide for high quality design to ensure that new development is sustainable.	Support Noted
1475	Edwards	Support	support for policy GN.2, paragraph 7.16 - reference to climate change	Page 81 paragraph 7.16. We welcome the reference to climate change within the supporting text.	Support Noted

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<u>GN.3 Infrastructure and New Development</u>					
2603		Object	Suggest that "water and sewerage infrastructure" is added to the list of criteria	Whilst we welcome the provisions of this policy and understand that the list of criteria is not definitive and that it is referred to in the following supportive text, we would suggest that "water and sewerage infrastructure" is added to the list of criteria in order that it is explicitly noted that developers may be required to contribute towards improvements in certain instances.	Change proposed. Agree. Propose change to GN.3 to add this item to the list of purposes for which contributions may be sought, but re-worded to read 'water, waste water treatment and sewerage infrastructure'.
34874	Bullimore	Object	Objection to policy GN.3 - the caveats in the policy risk undermining low carbon development.	However, the statement in GN.3 Infrastructure and New Development, that: "In the case of housing developments, priority will be given to affordable housing unless there is an overwhelming need for the available contribution, in whole or in part, to be allocated for some other appropriate purpose/s" appears to risk undermining low carbon development.	No change proposed. Shortage of affordable housing remains a key issue in the Plan area and is therefore identified as the top of the priority list. The Plan's overall strategy in combination with other policies on design will support low carbon development.
1555	Clarke MRTPI	Support	Support GN.3	Welcome Policy GN. 3 which seeks to secure new or improved community facilities. We would highlight that there are a number of theatres across the area which bring people together, provide opportunities for participation in the arts and cultural activity and improve social and cultural well-being. We suggest the policy text is amended to include reference to cultural facilities, or for supporting text to be amended to make clear that cultural facilities such as theatres, arts centres and cinemas are counted as community facilities.	Support noted.
1491	Dunne	Support	Support GN.3	Support Policy GN3 Infrastructure and New Development. The National Park Authority would welcome further engagement on the progression of the Community Infrastructure Levy discussion referred to in paragraph 7.23. Community Facilities and Infrastructure 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. Both Plans seek to prioritise affordable housing provision in the case of housing developments where necessary.	Support noted.
<u>GN.4 Resource Efficiency and Renewable and Low-Carbon Energy Proposals</u>					
34874	Bullimore	Object	Objection to policy GN.4 - policy wording is disappointing and not strong enough.		Change proposed. PCC recognises the need to undertake further work on the policy approaches on this issue within the Deposit Plan, drawing on the conclusions of the Renewable Energy Assessment

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<u>GN.4 Resource Efficiency and Renewable and Low-Carbon Energy Proposals</u>					
				The proposals in GN.4, Resource Efficiency and Renewable and Low-carbon Energy, are disappointing and beg the question whether they are really the best that PCC considers could be achieved. Such phrases as "should seek to ..." and "where appropriate" are simply not strong enough. "Expecting" and "supporting" through environmentally acceptable renewable energy solutions is not enough; they should be requirements.	prepared in 2017.
1491	Dunne	Support	Support GN.4	<p>Support GN4 Resource Efficiency and Renewable and Low-carbon Energy proposals.</p> <p>Note It would be beneficial to insert a cross reference to GN1 General Development in the reasoned justification.</p> <p>Renewable Energy 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.</p>	Support noted. The need for renewable energy proposals to meet the requirements of GN.1 at application stage is accepted, but if we were to include a cross-reference to this policy in the GN.4 reasoned justification, we would need to make a similar insertion in many other policies to be consistent. A paragraph to explain that the plan needs to be read as a whole will be included in the Deposit Plan.
1491	Dunne	Support	Support GN.4	<p>Support in principle. Support Policy SP1 Creating Sustainable Places, GN1 General Development, GN2 Sustainable Design and GN4 Resource Efficiency and Low Carbon energy Proposals.</p> <p>Climate Change The Authorities have a shared understanding of the need to plan for climate change and to mitigate its impacts and to provide for high quality design to ensure that new development is sustainable.</p>	Support noted.
1475	Edwards	Object	objection to policy GN.4, paragraph 7.27 - requesting inclusion of a reference to DNS where decisions on energy generating stations of 10MW to 50MW are made by the Planning Inspectorate	Page 85 paragraph 7.27. This paragraph should include a reference to the Development of National Significance (DNS) where decisions on energy generating stations of 10mw to 50mw are made by the Planning Inspectorate.	Change proposed. Agree. Additional text will be added to paragraph 7.27 for the Deposit LDP 2, to reference the role DNS and the Planning Inspectorate play in making decisions on energy generating stations of 10MW to 50MW.
1507	Newey	Object	Renewable Energy Assessment – should not restrict solar PV to agricultural grade 5 and lower.	The restriction of solar PV to grade 5 agricultural land and lower grade only is too constrained and not in line with the guidance in the Toolkit which states lower grade agricultural land of grades 3b, 4 and 5 should be assessed. The authority must justify their approach.	No change proposed, but matters to consider prior to finalising the Deposit plan. The PCC Renewable Energy Assessment addresses this issue. solar PV were

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<u>GN.4 Resource Efficiency and Renewable and Low-Carbon Energy Proposals</u>					
					shown on agricultural land of grades 3 to 5 inclusive, plus non-agricultural land, thus picking up Welsh Government's concern.
1507	Newey	Object	In Renewable Energy evidence LPA should justify exclusion zone of 1km along PCNPA for solar PV resources.	In relation to solar PV resources, the separation exclusion zone of 1km along the boundary with the National Park Authority should be justified.	No change proposed. PCC recognises the need to undertake further evidence work in a number of technical areas to inform the development of the Deposit Plan and to justify its position. A supplementary background paper on renewable energy, to explain / justify the 1km exclusion zone along the NP boundary for solar PV will be produced to accompany the Deposit Plan.
1507	Newey	Object	Authority should justify separation distance of 10-15km used in Renewable Energy Assessment.	In relation to the REA we have the following observations which require additional supporting evidence ; -□For wind technology, the authority should justify the separation distance of 10-15km, as a 7km distance is suggested in the 'Planning for Renewable and Low Carbon Energy – A Toolkit for Planners (September 2015).	No change proposed. Page 18 of the Renewable Energy Assessment refers to the 10-15km distance, which White Consultants recommended for turbines larger than 109m in height. It advises that Map 3.3.3 shows the effect of a 15km buffer zone applied to existing turbines (small to large) - the result of which was to exclude the whole of the study area for potential large-scale wind turbines. However, it also noted that applying a smaller 7km buffer, as recommended by the WG Toolkit, likewise resulted in the exclusion of the whole of the study area. Map 3.3.3 shows the cumulative impact of both 15km and 7km buffer zones. As no sites were identified with potential for future development of wind energy, no renewable energy contribution from wind technology was recorded in the REA. As the 7km and 15km separation distances gave the same result, there is no need for PCC to justify a 10-15km separation distance. Reliance will be placed on the results from the application of the 7km separation distance, which is what the WG Toolkit asks for.

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<u>GN.4 Resource Efficiency and Renewable and Low-Carbon Energy Proposals</u>					
1507	Newey	Object	Renewable Energy – LPAs should develop local policies and set targets.	LPAs should take a leadership role in pro-actively planning for renewable and low carbon energy. LPAs should fully utilise evidence in their renewable energy assessments (REA) to develop locally specific policies, set renewable energy targets and direct development to the most appropriate locations.	No change proposed, but further matters to check prior to finalising Deposit plan. PCC has already consented many renewable energy developments across its planning area. A REA has been prepared and its findings will inform the Deposit LDP 2.
3347	Ritchie	Object	Objection to policy GN.4 in relation to wind turbines - restrict to certain areas, perhaps a local version of a Strategic Search Area	<ol style="list-style-type: none"> 1. Under the current LDP there have been a significant number of applications for wind turbines, large solar energy installations and One Planet development in open countryside which would be protected from almost any other form of development. 2. Residents rightly expect protection from development, unless provided for in advance in the development plan. Such reasonable expectation has been denied, arguably due to policy lagging behind development demands. 3. LDP2 should address this problem by bringing such development strictly within specific categories of land or areas, as happens for other development. 4. Wind turbines above a small size could be restricted to certain areas, a miniature but strict version of the national Strategic Search Area. 	No change proposed. In relation to renewable energy, there have been many wind turbine and solar energy development across the PCC planning area since LDP adoption. Welsh Government wishes PCC to continue to support renewable energy developments and PCC recognises that this has to be done in the context of what has already been developed. A Renewable Energy Assessment has been prepared, whose findings will inform the provisions of the LDP 2 Deposit Plan. A balance will need to be struck between supporting low-carbon energy developments and ensuring that the individual and cumulative impacts of what is already consented is taken account of and the proximity of the Pembrokeshire Coast National Park recognised.
3347	Ritchie	Object	Objection to policy GN.4 in relation to solar energy proposals - restrict to certain areas, perhaps a local version of a Strategic Search Area - and to low fertility land - and only if agricultural and industrial building roofs can't provide the necessary capacity	<ol style="list-style-type: none"> 1. Under the current LDP there have been a significant number of applications for wind turbines, large solar energy installations and One Planet development in open countryside which would be protected from almost any other form of development. 2. Residents rightly expect protection from development, unless provided for in advance in the development plan. Such reasonable expectation has been denied, arguably due to policy lagging behind development demands. 3. LDP2 should address this problem by bringing such development strictly within specific categories of land or areas, as happens for other development. 5. Solar could likewise be restricted, but with a further requirement that it would only be allowed on low fertility land and after a test that there are no suitable industrial and agricultural building roofs in the County to make the capacity up. The reason of course being avoidance of loss of good farm 	

Stakeholder ID	Representor Surname / Organisation	Type of Representation	Representation Summary	Representation Full Text	Officer Response
<u>GN.4 Resource Efficiency and Renewable and Low-Carbon Energy Proposals</u>					
				land.	No change proposed, but matters to address prior to finalising the Deposit plan. The main response to these points is recorded under contributor 3347, representation ID 15039. With specific reference to solar energy proposals, the national policy drive to support renewable energy developments will need to be considered alongside the existing distribution of individual solar farms, their cumulative impact and the imperative of protecting National Park landscapes. Agree that agricultural land quality is a consideration and that there is potential in the PCC plan area for solar arrays to be located on the roofs of large industrial, agricultural and retail buildings. However, a highly restrictive policy on solar arrays will not conform to WG planning policy.
<u>GN.5 Infill Development in Hamlets</u>					
34643	Evans	Object	Object to the thresholds being too high	I also feel that the threshold of 20 dwellings for considering open market and affordable housing at the rural hamlets is too high, and 10 dwellings would provide more scope for mixed tenure dwellings in rural locations.	The threshold for 20 dwellings has been developed in relation to the scale and characteristics of settlements falling within the Settlement Hierarchy. Further evidence to justify the approach will be published as part of the Deposit Plan.
34643	Evans	Object	Object for GN.5	Paragraph 5.12 of the Preferred Strategy refers to opportunities for sensitive infilling where sites consist of 1-2 dwellings at rural hamlets or groups of dwellings. Policy GN.5 provides further details and assessment criteria. Criterion 2 of policy GN.5 refers to sensitive infill development of a small gap within an otherwise continuous built up frontage and appears to omit reference to rounding-off or minor sensitive extensions. Paragraph 3.56 of Planning Policy Wales (PPW, Edition 10, 2018) states: "Infilling or minor extensions to existing settlements may be acceptable, in particular where they meet a local need for affordable housing or it can be demonstrated that the proposal will increase local economic activity" (my emphasis). The omission, within the Preferred Strategy, to minor extensions at the rural groups/ hamlets, appears to be at odds with recently published Welsh Government policy. Furthermore, it would reduce the opportunity	No change proposed. This policy has been developed to respond to the Key Issues facing the Plan area, balancing this against the Authority's duties to protect and enhance the environment. Including a more generous criterion of rounding off led to very high levels of building in rural areas under the JUDP and could risk undermining the Plan's strategy if adopted in LDP2.

Stakeholder ID	Representor Surname / Organisation	Type of Representation	Representation Summary	Representation Full Text	Officer Response
<u>GN.5 Infill Development in Hamlets</u>					
				<p>for minor developments at rural hamlets, which could be an important source of deliverable rural housing, that would have positive impacts upon the rural and ageing communities.</p> <p>Arguably, appropriate assessments at application stage, by the Development Management Section, and the limitation of 1-2 dwellings would provide sufficient safeguards over insensitive or inappropriate development at the hamlets, or within the countryside. This amended approach would also bring the Authority in-line with the current strategies of Ceredigion and the Pembrokeshire Coast National Park.</p>	
34785	Hunt	Object	Object to Policy GN.5	<p>The Pembrokeshire Access Group (PAG) wishes to register its Objection to the Draft LDP2 Strategy as:-</p> <ul style="list-style-type: none"> •□The proposal is to retain the existing 60% : 40% urban : rural split of housing allocations , and •□To introduce Policy GN5 . <p>Both proposals will increase the absolute numbers living in smaller settlements where there are fewer and fewer services and facilities and where access to public transport is limited or non-existent. This objection is particularly relevant to proposed 'hamlets' of Policy GN5.</p> <p>The Access Group has noted that:-</p> <ul style="list-style-type: none"> •□Two critical issues are the aging population (anticipated increases in the over 65 population of 32% for the Plan area between 2017 and 2033) and reductions in the 0-15 age group of 2% over the same period. (Source:- Content of the LDP Preferred Strategy – Report to Cabinet 3rd December 2018). •□In 2033 Pembrokeshire's population will be aging with more people aged over 65, and fewer young people. (Source – Living and Working – para 1.15 in LDP) <p>With increases in age comes a need for greater support from others in the community particularly in respect of access as and when needed to transport, including access to public transport. According to a Seminar run by the LDP Team on 23rd January forecast population increase will be a reflection of the level of net migration. With the likelihood that the majority of the population increase will be from the 65+ age groups, it would seem appropriate to limit new build in rural areas to the larger of the settlements rather than those where dependency on the private car for transport is essential. There are, after all, a large number of existing homes in rural areas.</p> <p>PAG is an organisation affiliated to Disability Wales, which promotes facilitating access to sites, to transport and to information for those who are disabled or who have limited mobility.</p> <p>PAG has noted that:-</p> <ul style="list-style-type: none"> •□the Council itself has just completed a consultation exercise on reducing bus services particularly in rural areas to the degree that many of these services will be so infrequent that most people outside the towns or along key routes will be required to have regular access to a private car for everyday needs employment, shops, health services (including 	<p>No change proposed. This policy has been developed to respond to the Key Issues facing the plan area, balancing this against the Authority's duties to protect and enhance the environment.</p> <p>The need for a specific policy approach which supports the housing needs of older people, including the potential for Lifetime homes, and which enables older people to remain in their communities will be considered as part of the Deposit Plan. The settlement hierarchy will be re-assessed to take account of the review of bus services and access to the National Cycle network. Most development will be directed towards larger settlements.</p> <p>Additional evidence will be developed to demonstrate why the 60/40 split is the most appropriate strategy for Pembrokeshire and how it can deliver sustainability objectives. 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 further information in relation to the Welsh language and Affordable Housing need.</p> <p>The level of housing growth anticipated, with most development directed towards larger settlements and specific policy approaches which recognise the housing needs of older people, will give older people greater support and opportunities to live in main towns.</p>

Stakeholder ID	Representor Surname / Organisation	Type of Representation	Representation Summary	Representation Full Text	Officer Response
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GN.5 Infill Development in Hamlets

pharmacies) etc. A point particularly relevant to older persons, to the more vulnerable and to the less mobile.

- Other services and facilities delivered by both the public and the private sector have been in decline for a number of years and this trend shows no sign of reversing. Examples include the closure of shops, petrol filling stations, primary schools (eg Dale, Moylegrove, Pentlepoir, Mathry, Stackpole, Angle and Hayscastle), libraries, health centres etc.
- There is an inability for health and social care organisations, including the voluntary sector, to meet a growing need by the elderly and vulnerable to provide home care. The existing challenge to meet the needs of these residents will be compounded by having to meet the needs of additional residents in rural locations where greater travel time and therefore increased staff costs are required for each visit. Increasing isolation is already a concern in rural Pembrokeshire and the proposed settlement strategy will compound the problem.

The preamble to the Strategic Policies and to the General Policies, together with extracts from the Report to the Cabinet of 3rd December, include the following conflicts between the reasoned argument for the Strategy and its delivery:-

Para 5.8 Growth will be distributed across the Plan area in accordance with a spatial strategy which promotes sustainable development. ... A weighting system has been applied which gives greatest weight to those facilities identified as being likely to reduce the need to travel and therefore most likely to be a sustainable location. (Underlining for the purposes of this objection)

... In particular greater weighting has been given to the presence of schools, frequent bus services and community halls, with slightly reduced weight given to post offices. (Source – Report to Cabinet 3rd December 2018).

The proposed settlement strategies are inconsistent with the underlined statement as the following quotations suggest increasing the number of development opportunities in the less sustainable and unsustainable locations.

5.10 A 60/40% Urban / Rural split of housing allocations (sites over 5 units) is proposed. This is broadly in line with the current population split in Pembrokeshire and with the current pattern of allocations between urban and rural locations. The advantages of this approach are that it offers growth opportunities to both urban and rural communities.

5.12 In other rural locations, there will be limited opportunities for sensitive infilling where sites consist of 1-2 dwellings. In locations with a grouping of 20 or more dwellings, this can be for market housing.... In locations with a grouping of less than 20 dwellings, infill opportunities on sites for 1-2 dwellings will be for local needs affordable housing.

Changes in the type of housing permitted will be at the lowest levels of the Settlement Hierarchy are proposed – LDP2 will permit market housing in these locations (currently only local needs Affordable Housing is permitted). A ‘clusters’ concept has been used to also identify lower level

Stakeholder ID	Representor Surname / Organisation	Type of Representation	Representation Summary	Representation Full Text	Officer Response
<u>GN.5 Infill Development in Hamlets</u>					
				<p>settlements (Local Villages) which can accommodate greater growth because of their relationships to more sustainable settlements. The Preferred Strategy also proposed a limited infill policy, to apply in locations outside settlement boundaries. Under the current LDP no development is permitted in these locations. (Source – Report to Cabinet 3rd December 2018). (Underlining for the purposes of this objection).</p> <p>It is PAG’s contention that for the reasons given above (Commencing “PAG has noted” with 3 bullet points) that</p> <ul style="list-style-type: none"> • <input type="checkbox"/> An increase in housing allocations / potential permissions should be directed to the larger and more sustainable settlements (for example a 65:35% split rather than the maintained 60:40) • <input type="checkbox"/> New housing in the smaller villages and unsustainable locations (particularly as proposed in Policy GN5) should be restricted as at present – NOT relaxed. <p>A scattered settlement pattern also generates additional vehicle journeys which is contrary to efforts to mitigate climate change. The Well-being of Future Generations (Wales) Act 2015 contains as one of its 7 Goals “A prosperous Wales”, which is described as “An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); (Underlining for the purposes of this objection)</p>	
34745	Johnston	Object	objection to GN.5 – as it does not include provision for rounding off.	It is noted however that this policy does not include provision for rounding off. PPW advocates this approach (where appropriate) (PPW 3.56) and the matter is discussed in the preferred strategy (4.5). The dispersed nature of settlement in Northern Pembrokeshire means that communities struggle to achieve adequate access to development opportunities, allowing rounding off in certain circumstances would alter this situation and allow for greater levels of incremental growth more suited to the character of these settlements .	No change proposed. This policy has been developed to respond to the Key Issues facing the Plan area, balancing this against the Authority’s duties to protect and enhance the environment. Including a more generous criterion of rounding off led to very high levels of building in rural areas under the JUDP and could risk undermining the Plan’s strategy if adopted in LDP2.
34745	Johnston	Support	Support for infilling to minor rural settlement clusters – policy GN.5.	The return of infilling to minor rural settlement clusters is welcomed (policy GN.5)	Support noted.
34655	Peters	Object	Object to the omission of minor extensions		No change proposed – this policy has been developed to respond to the Key Issues facing the Plan area, balancing this against the Authority’s duties to protect and enhance the environment. Including a more generous criterion of ‘rounding off’ led to very high levels of building in rural areas under the JUDP and could risk undermining the Plan’s

Stakeholder ID	Representor Surname / Organisation	Type of Representation	Representation Summary	Representation Full Text	Officer Response
<u>GN.5 Infill Development in Hamlets</u>					
				<p>The general housing strategy is considered acceptable and the rural, urban split generally appropriate. The allowance for sensitive infilling at rural hamlets is welcomed and would help sustain rural communities. Comments below relate to development at undefined rural hamlets/ groups of dwellings.</p> <p>Paragraph 5.12 of the Preferred Strategy refers to opportunities for sensitive infilling where sites consist of 1-2 dwellings and the differentiation of rural groups of dwellings between those groups with 20 or more dwellings and those with under 20 dwellings. Policy GN.5 provides further details and assessment criteria.</p> <p>Criterion 2 of policy GN.5 refers to sensitive infill development of a small gap within an otherwise continuous built up frontage and appears to omit reference to rounding-off or minor sensitive extensions.</p> <p>Paragraph 3.56 of Planning Policy Wales (PPW, Edition 10, 2018) states: Infilling or minor extensions to existing settlements may be acceptable, in particular where they meet a local need for affordable housing or it can be demonstrated that the proposal will increase local economic activity.</p> <p>The omission, within the Preferred Strategy, to minor extensions at the rural groups/ hamlets, appears to be at odds with recently published Welsh Government policy. Furthermore, it would significantly reduce the opportunity for minor developments at rural hamlets. Arguably, appropriate assessments at application stage, by the Development Management Section would provide sufficient safeguard over insensitive or inappropriate development at the hamlets, or within the countryside.</p>	strategy if adopted in LDP2.
34655	Peters	Object	Support for Infill at Hamlets	The general housing strategy is considered acceptable and the rural, urban split generally appropriate. The allowance for sensitive infilling at rural hamlets is welcomed and would help sustain rural communities.	Support noted.
1564	Sinclair	Object	Object to GN.5 as inconsistent with Vision and Objectives		No change proposed. Additional evidence will be developed to demonstrate why the 60/40 split is the most appropriate strategy for Pembrokeshire and how it can deliver sustainability objectives. 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 further information in

Stakeholder ID	Representor Surname / Organisation	Type of Representation	Representation Summary	Representation Full Text	Officer Response
GN.5 Infill Development in Hamlets				<p>Having read the Pre-Deposit Consultation Documents CPRW Pembrokeshire is of the opinion that a number of the proposed policies within the Replacement LDP are inconsistent with the Vision and a number of the Objectives of the Deposit Draft and therefore consider that LDP2 is not 'sound'.</p> <p>LDP2 Vision ... where the challenges of rurality and climate change are successfully tackled....(para 2.2)</p> <p>LDP2 Objectives include ...</p> <p>A) <input type="checkbox"/> Mitigate and respond to the challenges of Climate Change. (Para 2.4)</p> <p>Key elements of the Strategy include the following extracts:-</p> <p>Para 5.8 Growth will be distributed across the Plan area in accordance</p>	<p>relation to the Welsh language and Affordable Housing need.</p> <p>The need for a specific policy approach which supports the housing needs of older people, including the potential for Lifetime homes, and choices which enable older people to remain in their communities will be considered as part of the Deposit Plan.</p> <p>The settlement hierarchy will be re-assessed to take account of the review of bus services and access to the National Cycle network. Appropriate means of sewage disposal will be considered as part of any development proposal.</p> <p>The Authority has commissioned a 'Local Housing Market Assessment' which will help establish levels of affordable housing need and the geographical split and tenure of affordable housing need. The Authority is aware that there is an affordable housing need in all areas.</p> <p>Policy GN.5 has been developed to respond to the Key Issues facing the Plan area, balancing this against the Authority's duties to protect and enhance the environment.</p> <p>Overall, there has been support for infilling from stakeholders. The LDP2 approach is restricted to the sensitive infilling of small gaps, at hamlets, and that impacts of cumulative proposals are fully taken into account. The potential impact in the character of an area will therefore be a key consideration.</p>

Stakeholder ID	Representor Surname / Organisation	Type of Representation	Representation Summary	Representation Full Text	Officer Response
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GN.5 Infill Development in Hamlets

with a spatial strategy which promotes sustainable development. ... A weighting system has been applied which gives greatest weight to those facilities identified as being likely to reduce the need to travel and therefore most likely to be a sustainable location. (Which CPRW supports) [Underlining for the purposes of this objection]

5.10 A 60/40% Urban / Rural split of housing allocations (sites over 5 units) is proposed. This is broadly in line with the current population split in Pembrokeshire. The advantages of this approach are that it offers growth opportunities to both urban and rural communities.

5.12 In other rural locations, there will be limited opportunities for sensitive infilling where sites consist of 1-2 dwellings. In locations with a grouping of 20 or more dwellings, this can be for market housing.... In locations with a grouping of less than 20 dwellings, infill opportunities on sites for 1-2 dwellings will be for local needs affordable housing.

... In particular greater weighting has been given to the presence of schools, frequent bus services and community halls, with slightly reduced weight given to post offices. (Source – as paragraph below).

Changes in the type of housing permitted will be at the lowest levels of the Settlement Hierarchy are proposed – LDP2 will permit market housing in these locations (currently only local needs Affordable Housing is permitted). A ‘clusters’ concept has been used to also identify lower level settlements (Local Villages) which can accommodate greater growth because of their relationships to more sustainable settlements. The Preferred Strategy also proposed a limited infill policy, to apply in locations outside settlement boundaries. Under the current LDP no development is permitted in these locations. (Source – Report to Cabinet 3rd December 2018).

CPRW fails to understand how the linkage between the stated and urgent need to Mitigate and respond to the challenges of Climate Change (Objective A) or to challenge rurality and climate change (part of The Vision), as reinforced by para 5.8 above, is met by proposing:-

- a strategy which maintains the status quo of 60% urban and 40% rural rather than seeking one of 65% urban and 35% rural for new build.
- policies which promote additional market and affordable housing in “other rural locations” (para 5.12 and Policy GN5)

at a time when:-

- the Council itself is undertaking a consultation exercise on reducing bus services particularly in rural areas to the degree that many of these services will be so infrequent that most people outside the towns or along key routes will be required to have regular access to a private car for everyday needs employment, shops, health visits etc.
- Other services and facilities delivered by both the public and the private sector have been in decline for a number of years and this trend shows no sign of reversing. Examples include the closure of shops, petrol filling stations, primary schools, (for example Dale, Moylegrove, Pentlepoir, Mathry, Stackpole, Angle and Hayscastle), libraries, health centres etc. (The LDP Seminar at County Hall on 23rd January noted a recent closure

Stakeholder ID	Representor Surname / Organisation	Type of Representation	Representation Summary	Representation Full Text	Officer Response
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GN.5 Infill Development in Hamlets

of a facility / service at Cilgerran)

- There is an inability for health and social care organisations, including the voluntary sector, to meet a growing need by the elderly and vulnerable to provide home care. The existing challenge of meeting the needs of these residents will be compounded by having to meet the needs of additional clients in rural locations where greater travel time and therefore increased staff costs are required for each visit.
- There is an acknowledged need on a national scale to reduce mileage by all vehicles whether they are petrol, diesel or electric due to gaseous and particulate omissions and the need to generate additional electricity to drive “carbon neutral” vehicles.
- Sewage disposal in scattered dwellings and in ‘hamlets’ is predominantly by septic tanks and sealed cess pits. Such answers are not the preferred solutions as contamination of ground water can occur if such systems are not regularly maintained / emptied. Ground water is the supply source for aquifers which in turn supply drinking water.
- Affordable housing (even for local needs) should, wherever possible, be concentrated in affordable locations; and CPRW suggests that such locations would be close to existing services and facilities that would include shops, schools, health centres (including surgeries and pharmacies), community halls and (reasonably frequent) public transport and not in 58 Local Villages and certainly not in the Hamlets of proposed GN5.

In the context of reducing the need to travel, one of the 7 Goals of the Well-Being and Future Generations (Wales) Act 2015 is “A Prosperous Wales” where this Goal is described as “An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change);”

Nor are we sure how the challenges of rurality are either met or even mitigated by allowing a more dispersed pattern of additional housing in ‘lower level’ settlements than under the current LDP1. LDP1 saw a welcome and strong determination to limit the number of new dwellings in minor settlements. CPRW would have thought that reversing adopted policy would have compounded problems of rurality as more new dwellings are very likely to be permitted in unsustainable locations – for example south of Ludchurch where recent refusals have been shown on the Candidate Sites map as “Amber” suggesting disappointed applicants should have another go as the LPA has decided what was previously unsustainable is now sustainable. (“Amber” Candidate sites comprise 093,157,159).

Planning Policy Wales Edition 10 of December 2018 para 4.2.24 states:-
 “In the open countryside, away from established settlements recognised in development plans or away from other areas allocated for development, the fact that a single house on a particular site would be unobtrusive is not, by itself, a good argument in favour of permission; such permissions could be granted too often, to the overall detriment of the character of an

Stakeholder ID	Representor Surname / Organisation	Type of Representation	Representation Summary	Representation Full Text	Officer Response
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GN.5 Infill Development in Hamlets

area.”

Comments have been made in the Feedback sections of the Report that there is support for such a more liberal LDP2. It is also true that in a previous seminar attended by CPRW many voiced concerns that, with the Council itself contracting service provision in terms of both funding and physical presence, any new development should be focussed on the established urban centres rather than on the rural settlements within the County and certainly not on isolated groups of dwellings.

CPRW therefore suggests that the Council is being inconsistent as:-

- on the one hand PCC, as a partner in the County’s Community Plan and reflecting the Goals in the Well-being of Future Generations Act, it is driving a programme of concentration on key services and centres, whilst
- on the other in the LDP2 (draft) changing its attitude to and allowing development in unsustainable locations.

Conclusion.

That there is a fundamental inconsistency between:-

- on the one hand the Vision for LDP2 and the associated Objective A of LDP2 and,
- on the other hand both the continuation of the intended 60% urban : 40% rural split of housing allocations (ie no change in the strategy whilst recognising in the preamble the need for change), together with the introduction of Policy GN5 which facilitates small scale developments in unsustainable locations.

Neither the overall strategy governing the distribution of new development nor specifically GN5 assists in the delivery of a sustainable vision which is compatible with the challenges of either climate change or meets the challenge the challenges of rurality.

CPRW would suggest that a 65:35% split urban:rural would be more a appropriate ratio under which to meet the challenges of climate change and the problems of rurality

Example.

CPRW is aware of one situation (and this certainly not unique) where over the last twenty years the number of properties has doubled despite the fact that:-

- All houses use septic tanks / sealed cess pits.
- There are no local buses (the nearest route is the 381 which is circa 3km away).
- As a result all households have at least one car
- All have courier deliveries
- There have been complaints that street lighting should be improved, bus shelters built for children catching the school bus and for broadening the area of speed restrictions as the local population increases, and there are no pavements – examples of why such locations are not sustainable.

However, and appropriately, during the period of the current LDP two planning applications for residential properties have been refused reflecting the unsustainable nature of this site.

Stakeholder ID	Representor Surname / Organisation	Type of Representation	Representation Summary	Representation Full Text	Officer Response
<u>GN.5 Infill Development in Hamlets</u>					
				LDP2 now proposes a possible reversal of a successful policy in what continues to be a non-sustainable location.	
1564	Sinclair	Object	Object to GN.5 'Infill Development in Hamlets'	<p>SP1 element 5 Accessibility to services and element 7 Reduced contribution to climate change.</p> <p>By promoting the opportunity to infill developments in hamlets (Policy GN5) the LPA is proposing development in locations with very limited access or no access to local services and facilities and to locations where the overriding method of transport will be by private car. The favoured population projection reflects the probability that net immigration will contain a high proportion of 65+ - a new population that will increasingly rely on access to a car rather than catching a bus or walking or cycling to services and facilities.</p>	<p>No change proposed. Policy GN.5 has been developed to respond to the Key Issues facing the Plan area, balancing this against the Authority's duties to protect and enhance the environment.</p> <p>The need for a specific policy approach which supports the housing needs of older people, including the potential for Lifetime homes, and choices which enable older people to remain in their communities will be considered as part of the Deposit Plan.</p>
1564	Sinclair	Object	Object to GN.5 'Infill Development in Hamlets'	<p>SP5 Settlement Hierarchy – A Sustainable Settlement Strategy . The number of identified settlements listed under this Policy where windfall, market, housing, local needs affordable housing and exception sites will be permitted is 6 + 1 + 8 + 48 + 58 or 121 which gives a wide range of sustainable settlements throughout the area of LDP2 without having to look for opportunities in 'hamlets' .</p> <p>SP6 Settlement Boundaries. Local Village Settlement Boundaries are defined more tightly, limiting opportunities to small scale infill and rounding off, although greater opportunities exist for development in Cluster Local Villages. (Presumably the rounding-off is within the proposed settlement limits)</p>	<p>Policy GN.5 has been developed to respond to the Key Issues facing the Plan area, balancing this against the Authority's duties to protect and enhance the environment.</p> <p>Settlement boundaries will include identified opportunities for infill and rounding off at Local Villages.</p>
1564	Sinclair	Object	Object to GN.5 'Infill Development in Hamlets' as it is inconsistent with points identified under tackling rurality	In terms of bullet points 2 & 3 under Tackling Rurality we would agree with both and therefore consider that the drafting Policy GN5 in particular is inconsistent with the 'vision' of Tackling Rurality.	No change proposed. Policy GN.5 has been developed to respond to the Key Issues facing the Plan area, balancing this against the Authority's duties to protect and enhance the environment.
1564	Sinclair	Object	Object to GN.5 'Infill Development in Hamlets'	Permitting more development in unsustainable countryside locations (Policy GN5 in particular) appears to be counter intuitive and therefore not justified.	No change proposed. This policy has been developed to respond to the Key Issues facing the Plan area, balancing this against the Authority's duties to protect and enhance the environment.
1564	Sinclair	Object	Object to GN.5 'Infill Development in Hamlets' on the basis that exception sites will allow for local needs affordable housing.		No change proposed. This policy is a specific response to the key issues facing the Plan. .

Stakeholder ID	Representor Surname / Organisation	Type of Representation	Representation Summary	Representation Full Text	Officer Response
<u>GN.5 Infill Development in Hamlets</u>					
				<p>It would appear to us that there is no justification for Policy GN5 as the phrase “for local needs affordable housing” if provision is going to be made for exception sites to meet the need for rural enterprise dwellings as described in TAN6 dated October 2017 para 4.3.1</p> <p>One of the few circumstances in which new isolated residential development in the open countryside may be justified is when accommodation is required to enable rural enterprise workers to live at, or close to, their place of work. Whether this is essential in any particular case will depend on the needs of the rural enterprise concerned and not on the personal preference or circumstances of any of the individuals involved. Applications for planning permission for new rural enterprise dwellings should be carefully assessed by the planning authority to ensure that a departure from the usual policy of restricting development in the open countryside can be fully justified by reference to robust supporting evidence. (Underlining for the purposes of this objection)</p>	Policy SP10 Countryside allows for appropriate opportunities for rural enterprise workers housing.
<u>Introduction</u>					
1507	Newey	Object	Key areas where evidence base can be improved or strengthened.	<p>Our representation also includes more detailed issues in the annex to this letter. Collectively , our comments highlight a range of issues that in our opinion need to be addressed if the plan is to be considered ‘sound’. We have indicated where evidence of soundness is not immediately clear and where the evidence base can be improved or strengthened going forward. Key areas include:</p> <ul style="list-style-type: none"> •<input type="checkbox"/> Spatial strategy, scale and distribution of growth •<input type="checkbox"/> Delivery and implementation of sites •<input type="checkbox"/> Welsh language •<input type="checkbox"/> Affordable housing and Local Housing Market Assessment (LHMA) •<input type="checkbox"/> Gypsy and Travellers •<input type="checkbox"/> Employment and economic growth •<input type="checkbox"/> Renewable energy •<input type="checkbox"/> Minerals 	PCC recognises the need to undertake further evidence work in a number of technical areas to inform the development of the Deposit Plan.
<u>SP.1 Creating Sustainable Places</u>					
2603		Support	Support Criterion 5	As we have already referred to, the availability and capacity of the water supply and public sewerage infrastructure is one of the key indicators of a settlement’s sustainability. As such, we welcome the inclusion of criteria five within this policy in contributing to creating sustainable places.	Support noted.
34874	Bullimore	Object			Further consideration will be given to the

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SP.1 Creating Sustainable Places			objection to policy SP 1 - policy text is over-ambitious, doesn't explain how conflicts will be dealt with or issues prioritised, both generally and in the context of specific initiatives such as the Swansea Bay City Deal, some of the text is welcome in terms of intent but too loose and it is difficult to see how the policies will deliver climate change objectives (there is more on adaptation and mitigation than on overcoming the issues)	<p>The Council clearly must accommodate a plethora of drivers in respect of the new LDP, from multiple national strategic policies and legislation, though regional economic policies and initiatives to local needs. However, this results in the critical problem that there is a real incompatibility between many of these drivers, goals and needs.</p> <p>SP 1, Creating Sustainable Places, is ambitious: "All proposals must ensure that development supports the delivery of economic, social, environmental and cultural well being." This is easy to write and very welcome, but it's a massive ask given the inherent conflicts between those goals. The LDP2 appears silent on both how are they going to prioritised, and the policies that spell out how they will be prioritised, or what the priorities will be when conflicts arise.</p> <p>Nevertheless, the pre-eminence of the Well being of Future Generations Act and the existential threats from climate change and its manifestations for Pembrokeshire are inescapable and must be recognised and accommodated now, in this LDP, and not at some unspecified point in the future.</p> <p>It is unclear how the seven well-being goals of the WBFG Act have been prioritized and conflicts arising from them been resolved.</p> <p>It is unclear how the conflicts between sustainability duties such as those identified by theWBFG Act have been reconciled with economic growth policies, eg those arising from the Swansea Bay City Deal.</p> <p>The LDP documents are liberally spattered with familiar, contemporary, politically correct phrases and aspirations, though on close scrutiny and consideration not all of these are mutually compatible.</p> <p>The repeated references and apparent aspirations to sustainability and low carbon development are very welcome. However, crucial judgements are flawed and wording in key policies too loose and provide far too much 'wriggle room' for developers, planning officers and the Council's planning committee.</p> <p>Addressing the critical overarching issue of climate change is in there, it's number 1 on the list of objectives on p.24, though there seems to be much more about adaption than mitigating contributions and it's hard to find the policies that are going to deliver the objective. Given that climate change impacts are here now, and will increase as global carbon emissions continue to increase rather than decrease, this urgency does not appear to be adequately reflected in</p>	precise wording of this policy during the preparation of the Deposit Plan.

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<u>SP.1 Creating Sustainable Places</u>					
				LDP2 decision making.	
1491	Dunne	Support	Support SP 1	<p>Support in principle. Support Policy SP1 Creating Sustainable Places, GN1 General Development, GN2 Sustainable Design and GN4 Resource Efficiency and Low Carbon Energy Proposals.</p> <p>Climate Change The Authorities have a shared understanding of the need to plan for climate change and to mitigate its impacts and to provide for high quality design to ensure that new development is sustainable.</p>	Support Noted
1475	Edwards	Object	Objection to policy SP 1 - is the policy sound and can it be applied to all development	Page 39 Policy SP1 – Creating Sustainable Places. This policy specifies that “All proposals must ensure that development supports the delivery of economic, social, environmental and cultural well-being and that development proposals should demonstrate the following:” We ask whether this policy is sound and can be applied to “All” development.	Comment noted. Further consideration of detailed policy wording will take place prior to the publication of the Deposit Plan.
34567	Evans	Object	Object to continued building work in areas where this has happened for over 10 years on the basis of the delivery of well-being goals.	<p>6.1 Local Authorities have a duty to achieve the Well-being goals set out in the Well Being of Future Generations Act and to deliver sustainable development and well-being. This policy sets out the main ways in which development proposals will be expected to demonstrate that they are supporting the delivery of economic, social, environmental and cultural well-being and therefore contributing towards sustainable development.</p> <p>Areas where building work has been ongoing for 10 years or more with unadopted roads proving problems for example mobility scooter users should be given a rest in order to support their well being, in accordance with 6.1</p>	No change required to the policy. A range of issues including deliverability and access will be considered during the assessment of Candidate Sites.
1564	Sinclair	Object	Correct typo at SP1. Creating Sustainable Places para 6.3	Para 6.3. Last sentence – “Wales” rather than ‘wales’	Agree - minor typographical error to be corrected.
<u>SP.10 Countryside</u>					
1494	Ashby-Ridgway (Nathaniel Lichfield & Partners)	Object	Object to Policy SP10	<p>The re-use and conversion of appropriate existing buildings.” Bourne Leisure endorses the approach at paragraph 6.81 which supports proposals for high quality visitor accommodation, attractions and leisure facilities, particularly those in the countryside. The commitment to creating a high quality destination which visitors will want to revisit through the provision of a “strong and diverse year round industry” is welcomed.</p> <p>Paragraph 6.81 of the Preferred Strategy is consistent with PPW (Ed. 10) which, in relation to “Productive</p>	No change proposed. This policy is in accordance with Planning Policy Wales Edition 10 and aims to address the Key Issues facing the Plan area. Detailed policies on topics such as tourism will be developed for the Deposit Plan.

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SP.10 Countryside				<p>and Enterprising Places” identifies the need to capitalise on Wales’ distinctive tourism offer to promote Wales to the world, creating high quality jobs in this sector which enhance skills and provide employment year-round.</p> <p>However, given the recognised importance of a year round visitor industry in PPW (Ed. 10) and paragraph 6.81 of the Preferred Strategy, Draft Policy SP 10 should include the promotion of year-round tourism accommodation and facilities in the countryside in order for the policies to be consistent with one another.</p> <p>Draft Policy SP10 ought to be amended as follows:</p> <p>“Proposals for development in Countryside locations will be supported where it is an essential requirement for people who live and work there and where it respects its landscape setting and the natural and built environment. Development which minimises visual impact on the landscape and relates to one of the following will be promoted:</p> <ol style="list-style-type: none"> 1. Enterprises for which a countryside location is essential, including One Planet Development. 2. Opportunities for rural enterprise workers to be housed in suitable accommodation that supports their employment; 3. Tourism accommodation and tourism facilities; 4. Appropriate agricultural diversification schemes; and 5. The re-use and conversion of appropriate existing buildings.” 	
1494	Ashby-Ridgway (Nathaniel Lichfield & Partners)	Object	Object to Policy SP10	<p>The re-use and conversion of appropriate existing buildings.”</p> <p>Bourne Leisure endorses the approach at paragraph 6.81 which supports proposals for high quality visitor accommodation, attractions and leisure facilities, particularly those in the countryside. The commitment to creating a high quality destination which visitors will want to revisit through the provision of a “strong and diverse year round industry” is welcomed.</p> <p>Paragraph 6.81 of the Preferred Strategy is consistent with PPW (Ed. 10) which, in relation to “Productive and Enterprising Places” identifies the need to capitalise on Wales’ distinctive tourism offer to promote Wales to the world, creating high quality jobs in this sector which enhance skills and provide employment year-round.</p> <p>However, given the recognised importance of a year round visitor industry in PPW (Ed. 10) and paragraph 6.81 of the Preferred Strategy, Draft Policy SP 10 should include the promotion of year-round tourism accommodation and facilities in the countryside in order for the policies to</p>	

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<u>SP.10 Countryside</u>					
				<p>be consistent with one another. Draft Policy SP10 ought to be amended as follows: “Proposals for development in Countryside locations will be supported where it is an essential requirement for people who live and work there and where it respects its landscape setting and the natural and built environment. Development which minimises visual impact on the landscape and relates to one of the following will be promoted: 1.Enterprises for which a countryside location is essential, including One Planet Development. 2. Opportunities for rural enterprise workers to be housed in suitable accommodation that supports their employment; 3.Tourism accommodation and tourism facilities; 4.Appropriate agricultural diversification schemes; and 5.The re-use and conversion of appropriate existing buildings.”</p>	
1494	Ashby-Ridgway (Nathaniel Lichfield & Partners)	Support	Support for paragraph 6.81	<p>The Preferred Strategy states: “A focus for the future is the provision of a strong and diverse year round industry, creating a high quality destination which visitors will want to revisit. A crucial feature of achieving this is ensuring that the aspect that draws visitors – the quality of the environment – is enhanced by any development that takes place. To ensure this is achieved proposals for visitor accommodation, attractions and leisure facilities, particularly those in the countryside, are required to be of high quality and to demonstrate that such a location is essential.” (paragraph 6.81) Draft Policy SP 10 of the Preferred Strategy states: “Proposals for development in Countryside locations will be supported where it is an essential requirement for people who live and work there and where it respects its landscape setting and the natural and built environment. Development which minimises visual impact on the landscape and relates to one of the following will be promoted: 1.Enterprises for which a countryside location is essential, including One Planet Development. 2.Opportunities for rural enterprise workers to be housed in suitable accommodation that supports their employment; 3.Appropriate agricultural diversification schemes; and 4.The reuse and conversion of appropriate existing buildings.</p>	Support Noted
1491	Dunne	Support	Support SP.10 Criterion 3	<p>Agriculture Rural Diversification/Conversion Both plans recognise the importance of agriculture and agricultural support industries to Pembrokeshire and the need to support appropriate</p>	Support Noted

Stakeholder ID	Representor Surname / Organisation	Type of Representation	Representation Summary	Representation Full Text	Officer Response
<u>SP.10 Countryside</u>					
				rural diversification.	
1491	Dunne	Support	Support SP.10 Criterion 4	Agriculture Rural Diversification/Conversion Both plans recognise the importance of agriculture and agricultural support industries to Pembrokeshire and the need to support appropriate rural diversification.	Support Noted
1475	Edwards	Object	Objection to policy SP 10, paragraph 6.48 - requesting clarification as it is not clear what is meant by the paragraph	Page 57 paragraph 6.48 reads "Pembrokeshire's natural and semi-natural environments also provide services to the economy and society which can be realised at a distance from the site in question e.g. Flood risk amelioration, water quality, air quality, climate change mitigation and adaptation, carbon sequestration, pollination of crops". It is not clear what is meant by this paragraph.	A change can be made to clarify the meaning of paragraph 6.48, in relation to the positive benefits that natural and semi-natural environments bring to society and the economy.
34567	Evans	Object	Object to SP.10	6.46 Pembrokeshire and its wider context, has a range of important environments and landscapes, some of which are shown on the Proposals Maps as nature designations. In addition to the specific environments that are protected by a range of designations, there are a number of non-designated landscapes, woodlands, hedgerows, trees and species that occur across the Plan area and contribute to making Pembrokeshire a special place. Some of the species found in Pembrokeshire are of significant value to the area's ecology including European protected species such as bats, otters, dormice and the marsh fritillary butterfly . The exception sites will not over rule 6.46	No change proposed – this policy is in accordance with National Policy and the strategic aims of the Plan.
34411	Reynolds	Object	Greater recognition needed on how rural communities actually function	In relation to "live-work" developments, also referenced in the PS; it would also be worth considering how potential changing work practices can be developed, or factored in to the emerging LDP - to provide rural housing, support rural industry as well as the local economy. Whilst live-work developments may be focussed to one or two local employment opportunities associated with main dwelling; wider benefits from corresponding business development can assist developing new economic opportunities within Pembrokeshire, and/ or, see the creation of local hubs where complementary businesses could be located. Changing retail practices are also worth considering when reviewing rural housing allocations. The rise of home delivery services for food produce, as well as general home/ retail purchases on-line e.g. Amazon, has seen a shift in how rural allocations could be considered sustainable, especially if the LPA's current assessment is focussed to assessing sites based solely on the use of the private car for travel purposes, without reflecting on wider social change. Wider impacts in respect of the viability of rural services/ shops also need to be addressed when housing allocations are reviewed e.g. increasing	No Change is proposed. Additional evidence will be developed in relation to the spatial strategy of the LDP including information on the opportunities created by new technology and home working. The Rural Facilities background paper has considered the range of services available to rural settlements, including shops. The appropriate policy approach to shops and town centres will be considered within the Deposit Plan. The settlement hierarchy of the plan seeks to direct most development to where there are good levels of existing services which are considered to be the most sustainable locations within the plan area. The role of local and village shops and public houses will be taken be considered within the Deposit Plan.

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<u>SP.10 Countryside</u>					
				<p>the local population, to enhance or support the local economy. The evolving function and role of retailing provision in wider towns and villages also needs to be considered in respect of the above. As part of the wider retail provision/ policy assessment; the impact of out of town shopping areas on town and village retail offerings, can also impact on rural centres, changing daily and weekly shopping patterns for existing or future residents.</p> <p>Rural village services have, in our opinion, an extended reach, whereby passing journeys from people travelling to and from work, or for general journeys, create passing trade opportunities - which can be further supported from any new rural housing allocation. This also impacts on the long-term potential for wider supporting service industries such as public houses. When reviewing allocations for both commercial and housing opportunities, a more detailed review of the provision and proximity to services is suggested e.g. the type and nature of each service in service towns and villages, reviewed against indicative population requirements to support such services. This may also impact on how the LPA considers outlying allocations and wider sustainability assessments being undertaken (when seeking to review new housing sites).</p>	
3347	Ritchie	Object	Objection to policy SP 10 - in the context of One Planet Developments - use the same / similar policy approach to that for camp sites - require them to be near a settlement, recognising sustainability arguments.	<p>1.Under the current LDP there have been a significant number of applications for wind turbines, large solar energy installations and One Planet development in open countryside which would be protected from almost any other form of development.</p> <p>2.Residents rightly expect protection from development, unless provided for in advance in the development plan. Such reasonable expectation has been denied, arguably due to policy lagging behind development demands.</p> <p>3.LDP2 should address this problem by bringing such development strictly within specific categories of land or areas, as happens for other development.</p> <p>6.One Planet development could be covered by the same (or a variation on the same) policy as camp sites, that is they must be near a settlement. The justification is the same albeit the sustainability argument is stronger for One Planet development.</p>	No change is proposed to SP 10 in response to this representation. Further evidence will be developed to support the Deposit Plan in relation to renewable energy One Planet Development is a national policy approach.
<u>SP.11 Protecting and Enhancing the Environment</u>					
1475	Edwards	Support	REP 2 (PS) - support for including a new policy on protecting and enhancing the environment - reflecting the local authority duty under the Environment Act 2016	we note you have included a new policy on protecting and enhancing the environment, to achieve the duty placed on you by the Environment Act 2016, which requires all Local Authorities to maintain and enhance biodiversity and to promote the resilience of ecosystems.	Support Noted

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<u>SP.11 Protecting and Enhancing the Environment</u>					
1475	Edwards	Support	Support for policy SP 11 (plus a request to be consulted on the forthcoming Biodiversity and Landscape Character SPGs)	Page 58 Policy SP11 Protecting and Enhancing the Environment. We welcome this policy and the supporting text which refers to the use of other documents which will help inform the LDP e.g. The Land Use Planning Tool and Pembrokeshire Nature Recovery Action Plan. There is reference to the Biodiversity and Landscape Character Areas SPGs, we request to be consulted on the production of these guidance documents.	Support Noted
1507	Newey	Object	Preferred Strategy should set out a direction of travel on how plan will improve biodiversity and reflect Environment Act 2016.	The Environment (Wales) Act 2016 sets out a legislative framework for the Sustainable Management of Natural Resources (SMNR) with provisions for public bodies to contribute to achieving SMNR. The Preferred Strategy should set out a 'direction of travel' on how the plan will aim to improve and not reduce biodiversity and further the resilience of ecosystems. Currently, the Preferred Strategy does not sufficiently reflect the Environment Act 2016.	PCC met WG officials and discussed this point in a meeting in February. Changes to the policy including an amendment to the title and specific wording on Green Infrastructure (rather than in the reasoned justification) will be introduced to address this point. As set out in the Preferred Strategy, additional work on this area will take place as part of the preparation of the Deposit Plan.
<u>SP.12 Port and Energy Related Development</u>					
1491	Dunne	Support	Support for cross referencing	<p>Support the conformity of approach. The reference in paragraph 6.60 to cross referring to General Policies which include GN.1 criterion 3) dealing with the National Park is supported.</p> <p>Note that with regard to Policy SP12 Port and Energy Related Development it is suggested that the reference to excluding wind energy generation would provide clearer advice if inserted in the policy text.</p> <p>The Spatial Strategy commentary above sets out where there is consistency of approach on where employment undertakings can take place in the County.</p> <p>The County Council and the National Park Authority are stakeholders in the preparation of a Regional Strategic Economic study currently being produced with a final report anticipated in 2019.</p> <p>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.</p> <p>Any issues arising for the National Park Authority would need to be considered in a future review of the Plan.</p> <p>Overall, the approach taken by Pembrokeshire County Council is likely to be compatible with the Pembrokeshire Coast National Park spatial</p>	Change proposed. Support noted. Also agree with the suggestion in paragraph 2 that the reference to excluding wind energy generation would be clearer if inserted in the policy text. Therefore propose a change to SP 12 to move the last sentence of 6.60 to the end of the main policy text.

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<u>SP.12 Port and Energy Related Development</u>					
				strategy.	
<u>SP.13 Employment Land Provision</u>					
1507	Newey	Object	Rep 30 – Deposit Plan evidence on employment should include employment target and buffer, allocations, identification of the Haven Waterway Enterprise Zone, appropriate policies and explanation of delivery.	<p>The Deposit Plan should:</p> <ul style="list-style-type: none"> - <input type="checkbox"/> Identify an employment/job target and buffer; - <input type="checkbox"/> Allocate sites to meet the need, including use defined by Use Class where appropriate; - <input type="checkbox"/> Identify the Haven Waterway Enterprise Zone in accordance with the Welsh Government's designation; - <input type="checkbox"/> If appropriate, include a new policy to protect and identify key employment sites to safeguard for future employment use; - <input type="checkbox"/> include a policy to support alternative uses on existing employment sites not safeguarded; and - <input type="checkbox"/> Explain how allocated sites will be delivered, especially key allocations. 	No change proposed. PCC recognises the need to undertake further evidence work in a number of technical areas to inform the development of the Deposit Plan. A Two County Economic Study covering Pembrokeshire and Carmarthenshire will inform the preparation of the Deposit Plan. PCC will also draw on information from its annual Employment Land Surveys.
<u>SP.14 Retail Hierarchy</u>					
1491	Dunne	Support	Support SP.14	<p>Retail</p> <p>Both Authorities' strategies focus on the need to maintain / create vibrant and diverse town, district and local centres.</p> <p>Both Plan's retail hierarchies are compatible and based on the findings of the South West Wales Regional Retail Study (February 2017) which was commissioned jointly with Ceredigion County Council.</p>	Support Noted
1564	Sinclair	Object	Object to the omission of residential as part of a mixed use at the former primary school site	The Candidate Sites Register, site 288 describes the former school site as proposed use – "Mixed use – housing, employment...." where as para 6.78 includes the sentence "Proposals for the former primary school will introduce a complementary range of community, retail and commercial uses" – no reference to residential. The last substantive application was for a mix of commercial and with housing as a first floor use. Suggestion – that "residential" should be included in para 6.78 although only as part of a mixed use.	This representation relates to paragraph 6.77 of the Preferred Strategy. This paragraph can be amended to refer to residential uses.
<u>SP.15 Visitor Economy</u>					
1494	Ashby-Ridgway (Nathaniel Lichfield & Partners)	Support	Support for Policy SP15 'Visitor Economy'	<p>Draft Policy SP 15 of the Preferred Strategy states:</p> <p>"Proposals for development relating to the visitor economy will be supported provided that they are in an appropriate location, contribute to the diversity and quality of accommodation and attractions, and respect and protect the natural and built environment and surrounding communities."</p> <p>The approach at draft Policy SP 15 is endorsed. It provides support for</p>	Support Noted.

Stakeholder ID	Representor Surname / Organisation	Type of Representation	Representation Summary	Representation Full Text	Officer Response
<u>SP.15 Visitor Economy</u>					
				<p>development that enables a range and choice of tourism accommodation to meet a variety of needs. Providing a range of different accommodation types can help maximise opportunities to attract visitors. The result of this support for greater diversity of tourism accommodation would be to support increased economic benefits to the region from the tourism industry, including creating jobs, attracting visitor expenditure and facilitating investment. Together, they will deliver this aspect of the Plan's Vision and Objectives. Draft Policy SP 15 is consistent with PPW (Ed. 10) which states "the planning system encourages tourism where it contributes to economic development, conservation, rural diversification, urban regeneration and social inclusion, while recognising the needs of visitors and those of local communities." (paragraph 5.5.2)</p>	
1491	Dunne	Support	Support SP.15	<p>Visitor Economy Both Authorities recognise the importance of the visitor economy to Pembrokeshire's economy and aim to support the visitor economy and to attract visitors all year round. Recognition is given by both Authorities to the attraction of the natural environment and the need for its protection. Between them the Plan strategies will allow for a range of visitor accommodation.</p>	Support Noted
<u>SP.16 Minerals</u>					
1491	Dunne	Support	Support SP.16	<p>Support the compatibility of approach between the two Plans and with national planning policy.</p> <p>Minerals The terrestrial sand and gravel landbank and the apportionment of provision to meet future needs is now considered on a regional basis.</p> <p>There are current sand and gravel production sites in the Pembrokeshire Coast National Park, further sites and allocations in Ceredigion and some small-scale production in Carmarthenshire. However, the regional landbank for sand and gravel is rather limited in comparison with that available for hard rock. National Park sand and gravel production at the two current production sites will eventually cease and production and allocation sites elsewhere in the region are of limited capacity.</p> <p>New terrestrial production sites within the region but outside the National Park are needed.</p> <p>The Plan sets out its approach to meeting that long term need in the</p>	Support noted.

Stakeholder ID	Representor Surname / Organisation	Type of Representation	Representation Summary	Representation Full Text	Officer Response
SP.16 Minerals					
2841	Melanie	Object	<p>General comments about the coal mining legacy in the PCC planning area, including public safety, land instability problems, mine entries, addressing these issues in conjunction with new development and the role of the Coal Authority in relation to new development proposed in coal resource areas.</p>	<p>Coal Mining Legacy</p> <p>As you will be aware, the Pembrokeshire County Council area has been subjected to coal mining which will have left a legacy. Whilst most past mining is generally benign in nature, potential public safety and stability problems can be triggered and uncovered by development activities .</p> <p>Problems can include collapses of mine entries and shallow coal mine workings, emissions of mine gases, incidents of spontaneous combustion, and the discharge of water from abandoned coal mines. These surface hazards can be found in any coal mining area, particularly where coal exists near to the surface, including existing residential areas. The Planning Department at the Coal Authority was created in 2008 to lead the work on defining areas where these legacy issues may occur.</p> <p>The Coal Authority has records of over 171,000 coal mine entries across the coalfields, although there are thought to be many more unrecorded. Shallow coal which is present near the surface can give rise to stability, gas and potential spontaneous combustion problems. Even in areas where coal mining was deep, in some geological conditions cracks or fissures can appear at the surface. It is estimated that as many as 2 million of the 7.7 million properties across the coalfields may lie in areas with the potential to be affected by these problems. In our view, the planning processes in coalfield areas need to take account of coal mining legacy issues.</p> <p>Within the Pembrokeshire County Council area there are approximately 1784 recorded mine entries and around 220 coal mining related hazards have been reported to The Coal Authority. Mine entries may be located in built up areas, often under buildings where the owners and occupiers have no knowledge of their presence unless they have received a mining report during the property transaction. Mine entries can also be present in open space and areas of green infrastructure, potentially just under the surface of grassed areas. Mine entries and mining legacy matters should be considered by Planning Authorities to ensure that site allocations and other policies and programmes will not lead to future public safety hazards.</p>	<p>No change proposed.</p> <p>The coal mining legacy of the PCC planning area is acknowledged and matters relating to land instability will be addressed through policy GN.1 (criterion 8) and the related reasoned justification text (e.g. paragraph 7.8). It is noted that the Coal Authority does not consider that land instability and the coal mining legacy are a complete constraint on new development. However, the coal mining legacy will be taken into consideration in assessing candidate sites, proposing allocations for the LDP 2 Deposit Plan and in relation to planning applications.</p>

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<u>SP.16 Minerals</u>					
2841	Melanie	Object	General comment about coal resources capable of extraction by surface mining operations in the PCC planning area, avoiding unnecessary sterilisation of those resources by new development, seeking prior extraction of coal and addressing land instability problems associated with coal.	<p>Although mining legacy occurs as a result of mineral workings, it is important that new development recognises the problems and how they can be positively addressed. However, it is important to note that land instability and mining legacy is not a complete constraint on new development; rather it can be argued that because mining legacy matters have been addressed the new development is safe, stable and sustainable.</p> <p>As The Coal Authority owns the coal and coal mine entries on behalf of the state, if a development is to intersect the ground then specific written permission of The Coal Authority may be required.</p>	<p>No change proposed, but matters to consider prior to finalising the Deposit plan.</p> <p>Since the Preferred Strategy was published, Welsh Government has published PPW edition 10. Paragraph 5.10.17 notes that safeguarding of the primary coal resource is no longer required. However, the Council still has an option to provide that safeguarding. Further consideration will be given to whether or not it is still appropriate to safeguard coal given Welsh Government's commitment to reducing carbon emissions and the reduced importance of coal in providing national energy security. If safeguarding of the primary coal resource is not taken forward by the Deposit LDP 2, it follows that the prior extraction requirement relating to this mineral may no longer be necessary. While the Coal Authority does not wish to see coal resources unnecessarily sterilised by new development and wishes PCC to consider prior extraction of coal to avoid this, the position of Welsh Government on coal safeguarding and hence also prior extraction has changed. PCC will form a view on the best way forward on this for the Deposit LDP 2. Land instability is covered by policy GN.1. The potential to reduce land instability through prior extraction will also be given further consideration in conjunction with</p>

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<u>SP.16 Minerals</u>					
2841	Melanie	Support	Support for policy SP 16 - minerals.	<p>Policy SP16 Minerals</p> <p>We are pleased to see that this policy identifies that known resources of coal will be safeguarding from permanent development.</p>	<p>preparation of the Deposit LDP 2.</p> <p>Support noted.</p>
1507	Newey	Object	Deposit Plan should reference landbank requirements in Regional Technical Statement and state how LDP will satisfy these. We note current under provision in Pembrokeshire (inc. PCNPA), Carmarthenshire and Ceredigion.	<p>Minerals</p> <p>The Deposit Plan should reference the landbank requirements set out in the Regional Technical Statement (RTS) and state how the LDP will satisfy these. We note there is an under provision of 2.94mt of sand and gravel reserves within the region of Pembrokeshire (including the National Park) Carmarthenshire and Ceredigion. These authorities should work collaboratively to address the shortfall and identify specific sites.</p>	<p>No change proposed, but matters to address prior to finalising the Deposit plan.</p> <p>The Deposit Plan will reference the RTS, which is currently being reviewed for the second time. The regional sand and gravel shortfall is acknowledged. PCC has and will continue to work with other authorities in SW Wales to try to address the shortfall. There are three LDP 2 Candidate Sites in PCC's planning area and their suitability for sand and gravel quarry allocations will be evaluated in conjunction with preparation of the Deposit Plan. However, this is a regional issue and not one for PCC to resolve exclusively. If specific sites cannot ultimately be identified, then the fall back position is an area of search based on the economic sand and gravel resource of the Plan area (as defined by BGS).</p>
<u>SP.17 Welsh Language</u>					
1491	Dunne	Support	Support SP.17	<p>Support SP17 Welsh Language, GN1 General Development Policy. Similar approach taken.</p> <p>Note GN1 General Development Policy Criterion 3) refers to both impacts on landscape in the County's planning jurisdiction and the National Park.</p> <p>Environment & Culture</p> <p>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.</p> <p>Both Plans take account of the need to not compromise either individually or cumulatively the qualities of important landscapes including the Pembrokeshire Coast National Park.</p>	Support Noted

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<u>SP.17 Welsh Language</u>					
				<p>The Welsh language which continues to be an important component in the social, cultural and economic life of many communities in the County will be protected and supported by managing development sensitively in areas where it has a significant role in the community.</p> <p>Both Authorities are preparing joint Archaeology Lighting and Biodiversity Supplementary Planning Guidance.</p>	
1507	Newey	Object	Deposit Plan would benefit from an assessment of how Welsh language has influenced the growth strategy, whether there are any anticipated negative impacts on the language and a justification of the 20% threshold for Welsh language sensitive areas.	<p>Welsh language</p> <p>The authority has identified Welsh language sensitive areas with a threshold of 20% (Policy SP17). The Deposit Plan would benefit from;</p> <ul style="list-style-type: none"> - <input type="checkbox"/> An assessment of how the Welsh language has influenced the growth strategy (scale and location) for those areas, primarily in the north east rural parts of the plan area, defined as areas of Welsh language sensitivity; - <input type="checkbox"/> Whether there are any anticipated negative impacts on the language which should be avoided, or where they cannot be avoided, require mitigation - <input type="checkbox"/> A justification of how the threshold of 20% aligns with neighbouring authorities. 	Further information will be included within the Welsh Language Background Paper and, where appropriate, within the Deposit Plan in response to this representation.
<u>SP.18 Transport Infrastructure and Accessibility</u>					
34785	Hunt	Support	Support for part of SP18 'Transport Infrastructure and Accessibility'.	PAG is pleased to support element 3 of SP 18 "Pedestrian and cycleway schemes coming forward in conjunction with the Act Travel (Wales) Act, 2013 will be supported" as this will enable greater accessibility for all.	Support noted.
<u>SP.19 Waste Prevention and Management</u>					
1491	Dunne	Support	Support SP.19	<p>Support Policy SP 19 Waste Prevention and Management.</p> <p>Waste</p> <p>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.</p>	Support noted.
<u>SP.2 Housing Requirement</u>					
2330	Chesters	Object	Objection to Policy SP2 'Housing Requirement', paragraph 6.6 inclusion of the 15% flexibility allowance.	<p>Plan ref SP2 Housing requirement – 6.6</p> <p>6.6 should be amended to lower the additional allowance. In our opinion a 15 percent Ad Hoc additional allowance makes previous housing level determinations meaningless.</p>	Further consideration will be given to this issue in the preparation of the Deposit Plan and additional evidence published to justify the flexibility allowance level.

Stakeholder ID	Representor Surname / Organisation	Type of Representation	Representation Summary	Representation Full Text	Officer Response
<u>SP.2 Housing Requirement</u>					
1507	Newey	Object	At Deposit will need to demonstrate why a 15% flexibility is appropriate.	Further evidence will need to be provided in the Deposit Plan to demonstrate; -□why a 15% flexibility allowance is appropriate and how it relates to all housing components, delivery and phasing over the plan period;	Further consideration will be given to this issue in the preparation of the Deposit Plan and additional evidence published to justify the flexibility allowance level.
<u>SP.3 Affordable Housing Target</u>					
34874	Bullimore	Support	The emphasis on affordable housing is understandable and welcome	support for policy SP 3 - emphasis on affordable housing	Support Noted
1491	Dunne	Support	Support AH target	<p>Support the conformity of approach and continuing to liaise on affordable housing policy and guidance development.</p> <p>E. Affordable Housing Both plans place a strong emphasis on delivering affordable housing to meet local needs. There is a shared approach to identifying the scale of need using the Local Housing Market Assessment 2014.</p> <p>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.</p> <p>Both Authorities are also part of a joint commission with neighbouring authorities on assessing viability in the region.</p> <p>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.</p> <p>The authorities also intend to prepare a joint affordable housing supplementary planning guidance to replace currently adopted supplementary planning guidance.</p>	Support Noted
1934	Gigler	Support	support for provision of affordable homes (noting this comment is made in the broader context of concern over possible release of greenfield land for development).	I fully support the need for more affordable homes	Support Noted.
34774	Gray (Clerk)	Object	Need more affordable housing	The Council would like to see more affordable housing become available in smaller hamlets and villages throughout Pembrokeshire allowing rural areas the opportunity to grow and not stagnate.	No change proposed. The Preferred Strategy aims to support both rural and urban areas in delivering housing including affordable housing.
1507	Newey	Object	No LHMA has been published.	Affordable housing and the Local Housing Market Assessment (LHMA)	

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<u>SP.3 Affordable Housing Target</u>					
				There is no up-to-date LHMA published (current version 2012) which is a core piece of baseline evidence influencing the scale, type and location of growth for a plan.	PCC is progressing a regional LHMA which is due for publication by the end of May 2019. This will then be used to inform the deposit plan and will be a key piece of evidence.
1507	Newey	Object	Question Affordable Target of 2,000 new affordable units.	Policy SP3 sets a target to deliver 2,000 new affordable units, a considerable increase from a target of 980 affordable units in the adopted plan. There is no evidence to demonstrate how the target will be delivered using cross subsidy from market housing, public sector subsidy or direct delivery by the local authority or RSL's. There is no viability assessment to support delivery of this target. We note the target equates to 30% of the overall housing provision, yet the indicative targets in the adopted LDP for affordable housing (informed by viability evidence) does not exceed 25%. How then will 30% be delivered?	No change proposed to the Preferred Strategy. PCC's Annual Monitoring reports show that affordable housing delivery has consistently exceeded current LDP affordable housing targets. The new target is based on historic and anticipated levels of delivery of affordable housing rather than on the level of need and founded by robust evidence.
<u>SP.4 Supporting Prosperity</u>					
34567	Evans	Object	Object to SP.4	6.17 Given the uncertainties around the economy associated with Britain exiting the EU, it is critical for the Plan to provide sufficient flexibility to respond to changing circumstances. This flexibility will in part be created by criteria based policies which will enable applications on sites outside allocations to be considered. The project fear scenarios for the economy through BREXIT have been shown to be false and should say so.	No change proposed. New evidence proposed - Two County Economic Study. Agree that there is great uncertainty regarding what form Brexit will take and the economic impacts across Wales and within Pembrokeshire. It is likely that the Deposit LDP 2 will include both employment allocations and criteria based policies, which is also the approach of the current Plan. A two-county economic study for Carmarthenshire and Pembrokeshire is to be prepared shortly and this will be updated one year after publication, anticipating that there will be more certainty over the Brexit outcome by that time. Although no specific change to policy SP4 is proposed in response to this representation, close attention will be paid to the Brexit situation when preparing the Deposit Plan.
34774	Gray (Clerk)	Support	Welcome support for economic prosperity.		Support noted. However, extension to

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<u>SP.4 Supporting Prosperity</u>					
				The City Council would welcome opportunities for more business start ups / enterprise units and suggest that the non-domestic rateable charges relief period is extended and reduced gradually in order to allow new businesses the opportunity to become fully established.	the non-domestic rateable charges relief period is outside the scope of the LDP.
1507	Newey	Object	Employment forecasts have not informed the plan – SP4 is unclear on relationship with Swansea Bay City Region and Haven Waterway Enterprise Zone.	Employment and economic growth Employment forecasts from Experian Goad (2018) and the Regional Economic Study to establish land use requirements have not informed the plan/policies. Policy SP4 supports the delivery of 2,200 jobs, but it is unclear how this growth level relates to opportunities arising from the Swansea Bay City Region and the Haven Waterway Enterprise Zone.	No change proposed. New evidence proposed - Two County Economic Study. The Local Employment Trends background paper (December 2018) explains the basis for the increase in projected workforce jobs over the plan period (2017-2033). The increase is anticipated to be at a modest pace (from 62,200 such jobs in 2017 to 64,400 in 2033). The projection is based on ONS data, is for Pembrokeshire as a whole and assumes a soft Brexit. Particular growth is projected in jobs liked to accommodation and food and health and social care sectors. It adds that many of the additional jobs will be part-time in nature. Some of these jobs will arise from the Swansea Bay City Deal (particularly in the renewable energy sector) and from the Haven Waterway Enterprise Zone (a fiscal initiative available for business proposals in spatially defined areas in various parts of the County). While any new jobs created through these initiatives will be welcome, Pembrokeshire is not the primary focus of the Swansea Bay City Deal. Also, while fiscal assistance to businesses is helpful, in itself it does not guarantee significant uptake. While large businesses are important to Pembrokeshire, so too are small and medium sized enterprises and their cumulative impact. A Two County Economic Study for Carmarthenshire and Pembrokeshire is being commissioned and its outcomes will help inform the economic policies and proposals of the Deposit LDP 2.

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<u>SP.4 Supporting Prosperity</u>					
1507	Newey	Object	At Deposit must demonstrate link between the plan's housing requirement and target for 2,200 jobs.	<p>Further evidence will need to be provided in the Deposit Plan to demonstrate;</p> <p>-□the link between the plan's housing requirement and target for 2,200 jobs to ensure broad alignment in economic activity and labour force projections and reduce the need for commuting.</p>	<p>No change proposed. PCC recognise the need to undertake further evidence work in a number of technical areas to inform the development of the Deposit Plan. This will include a 2 County Economic Study and further information regarding the housing requirement and its spatial distribution.</p> <p>Housing demand in the major urban centres of Wales is to a large extent driven by job creation and the in-migration that this creates. In such areas, linking the housing requirement of an LDP to a jobs target makes sense. In Pembrokeshire, housing demand is to a significant extent driven by retirement migration rather than new jobs. Hence linking the housing requirement to a jobs figure would not be appropriate in PCC's plan area. PPW edition 10 says that planning authorities need to understand their local housing market and the factors influencing housing requirements in their area over the plan period. (Para 4.2.3). In that context, paragraph 4.2.7 says that, amongst other things, migration has the ability 'to influence outcomes significantly'. PCC has concluded that it must cater for job creation driven housing demand and also the element of demand arising from retirement in-migration (and a range of other matters that affect housing demand).</p> <p>Having said this, it is sustainable to collocate employment opportunities where there are areas of existing and proposed housing, to provide new residents with travel choices and to reduce a need for commuting and this approach will be followed in directing growth. PCC also notes that technological developments mean that a lot of people now have the ability to work from home (at least some of the time) which will also reduce the need for commuting. Evidence on this issue will be gathered as part of the 2 County Economic Study.</p>

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<u>SP.5 Settlement Hierarchy - A Sustainable Settlement Strategy</u>					
2124	Belton	Support	Support Keeston identification as a Service Village	<p>Whilst no explicit amendments are required within the Preferred Strategy, it should be noted that, whilst the settlement itself has a limited range of facilities (scoring a weighted score of 8 within the Council's Rural Settlement Report), it has a close functional relationship with Haverfordwest, which is identified as a Hub Town within Pembrokeshire's LDP providing a range of facilities and employment opportunities. The closest bus stops to the application site are located on the A487 near the West Lane junction. They are approximately 550m walk to the south of the candidate site and is linked to it by a segregated footway that extends the length of West Lane to its junction with the A487. These bus stops provide access to the No. 411 bus service (Haverfordwest – St Davids, hourly, Monday – Saturday). A segregated cycle path is moreover available to prospective residents of the site which links Keeston to Haverfordwest (circa 30-minute cycle time). It accordingly has excellent public transport links and greater accessibility to a wider range of facilities, services and employment opportunities than a number of more remote Service Villages.</p> <p>PPW states that “clusters of smaller settlements where a sustainable functional linkage can be demonstrated, should be designated by local authorities as the preferred locations for most new development including housing” (page 34). Keeston, as a Service Village within proximity and enjoying a sustainable functional linkage to Haverfordwest, should according be allocated with sufficient housing reflective of its position.</p> <p>In</p>	Support Noted
2124	Belton	Support	Support Sustainable Rural Communities	<p>In addition to the above, it should be noted that, the WCFG Act, which the LDP must accord with, includes a wide-range of well-being goals. Sustainability relates to a number of aspects in addition to accessibility to facilities. Without the provision of new housing at settlements such as Keeston, 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 viability of these services. An increase in the older (65+) age groups is estimated within the Demographic Forecasts Paper (July 2018). New development is required to support younger families moving to the area, and is therefore more likely to support the role of Welsh language and culture within these settlements through appealing to a more youthful population profile than currently exists within Local Villages.</p> <p>Without positively allocated land at settlements like Keeston, there would be no further 'planned' housebuilding within the next plan period – running up to 2033. Any housing development would be as a result of 'windfall' development – which has not been positively planned for through the plan-making process. Whilst it is accepted that such development should form part of the Council's supply of housing, the Welsh Government's response to the recent consultation on Technical Advice Note 1 stated that applications being submitted on unallocated sites is “generating uncertainty for communities and is to the detriment of the plan-led system</p>	Support Noted

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<u>SP.5 Settlement Hierarchy - A Sustainable Settlement Strategy</u>					
				[and that] It is considered that planning authorities should be focusing on the delivery of sites allocated in development plans". It is accordingly considered that the positive allocation of housing land at Keeston is required to give the local community greater certainty through the plan-led provides.	
34874	Bullimore	Object	objection to policy SP 5 - Tiers Cross has been scored incorrectly and should be a Local Village and not a Service Village - there has been no increase in services (since the last Plan)	Local comments for Tiers Cross. The village has been scored incorrectly as a "Service Village" having been reclassified upwards "due to an increase in their recognised services and facilities" since the last LDP. This decision is flawed and unjustifiable. There has been no increase in services. The village has a shortage of the key services that most people would use routinely (eg shop, post office), with the last significant change in services being the loss of the post office. The village has been just tipped over the scoring threshold for Service Village by the 3 points awarded for having a "Community Hall". There is no community hall in the village and classifying the Church's 'schoolroom' as a community hall is stretching of imagination and definition too far. On this basis Tiers Cross should remain classified as a local village.	The Settlement Hierarchy will be re-assessed in April 2019 to reflect updated information, the review of bus services approved by PCC Cabinet in March 2019 and to assign greater weight to settlements which have access to the National Cycle Network.
34874	Bullimore	Object	objection to policy SP 5 - Settlement Hierarchy - the selection of option 2 is inconsistent and many policies therefore unjustifiable - option 1 (70% / 30% urban / rural split) is most sustainable and should have been adopted	Settlement Hierarchy (SP5). The evidence reports and sustainability appraisals clearly judge Spatial option 1 (70:30) split as most sustainable, but Option 2 has been selected seemingly as a half way between that and the current rural:urban split, for what appear to be questionable short-term reasons. Given that the settlement pattern is not currently reflecting PCC's centralisation of critical public services and PCC recognises the need to cut vehicle mileage to contribute toward sustainability, the selection of Option 2 is inconsistent with many policies and therefore unjustifiable. Option 1 should be adopted.	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 sustainability objectives. 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 further information in relation to the Welsh language and Affordable Housing need.
34878	Burks	Object	concern over scale of future growth in Pentlepoir if various Candidate Sites are accepted.		No change proposed to the level of growth identified in the Preferred Strategy. As set out in the Preferred Strategy the growth level is slightly above

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<u>SP.5 Settlement Hierarchy - A Sustainable Settlement Strategy</u>					
				<p>Please accept this letter as a formal objection to a number of proposed candidate sites as contained within p76 of the Candidate Site register (please see attached copy and map for reference).</p> <p>My initial vested interest in one of these proposed candidates sites was one of geographical location to my residence however upon further investigation I am now growing more concerned with the potential approach towards the over development of Pentlepoir village as a whole. Having fully reviewed the Local Development Plan and its associated evidence papers it is clearly apparent that the county as a whole is currently building dwellings at a rate greater than is require in accordance with the current Population projection plans, as published on the Pembrokeshire county council planning website .</p> <p>Ref: Population, Household and Labour Force Projections Development Plans September 2008 Prepared by Brian Stickings GIS/Information Manager Policy & Corporate Planning Pembrokeshire County Council</p> <p>“p.35 Dwellings Requirement The following table suggest that for the area of Pembrokeshire outside the National Park will require a total of 5155 new dwelling for the period 2006-2021, which equates to an average build of 345 units per annum, which compares with a current average completions rate of approximately 470 dwellings per annum.”</p> <p>Pentlepoir village has steadily grown through development year on year with the creation of many new housing estates which have all fed both directly and indirectly into the A478, which is already an extremely busy road servicing the popular holiday resorts of Tenby and Saundersfoot. Surely creating increased traffic attempting to join this already busy road should be considered a dangerous idea.</p> <p>It is my intention through this objection letter to appeal to the members of the community council to fully review and consider the points of objection that I have raised and for them to take great care and consideration to the long term effects and ultimate needs of the rural village of Pentlepoir. As</p>	<p>that derived from a 15 year migration trend and in the middle of average completion levels across the last 5 and 10 years. Because the figure is within the range delivered historically by the local building industry, the Authority is confident that it represents a deliverable target. The slightly higher figure will support greater levels of affordable housing and help to ensure a more balanced population profile by 2033. Specific assessment of Candidate sites will take place as part of the preparation of the Deposit Plan.</p>

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<u>SP.5 Settlement Hierarchy - A Sustainable Settlement Strategy</u>					
				potential development of this scale would almost double the size of the village and far exceed the current need for housing within the locality. I fully appreciate the councils need to keep the village prosperous and moving forward however I urge them to consider their duties to the current residents of Pentlepoir and the overall look and feel of the village .	
34902	Burrow	Object	Objection to the classification of East Williamston as a Service Village	<p>East Williamston should not be classed as a service village. No school, poor access via a single track. Score of 10 making EW a "serviced village". If the mobile library were to cease then it wouldn't be. East Williams classification as a service village should be removed, as before East Williamston is not a Service Village. Your system needs amending to recognise this truth.</p> <p>[Officer note. This response is also made in respect of the Review Report].</p>	The Settlement Hierarchy will be re-assessed in April 2019 to reflect updated information, the review of bus services approved by PCC Cabinet in March 2019 and to assign greater weight to settlements which have access to the National Cycle Network.
2151	Clark	Object	Object to East Williamstons Categorisation	The main objection to the prospect of further development is the access road, the single lane country road from Cold Inn, and its ability to cope with additional demand. The speed limit through Cold Inn (40mph) was already too high and considering the amount of residents living there should already be 30mph. The creation of any new traffic as a result of future expansion of East Williamston is only going to make the situation worse, and should be borne in mind .	The Settlement Hierarchy will be re-assessed in April 2019 to reflect updated information, the review of bus services approved by PCC Cabinet in March 2019 and to assign greater weight to settlements which have access to the National Cycle Network.
34706	Crocker	Object	Station Terrace should be included under Letterston	The area to the east of the Letterston settlement boundary known as Station Terrace should be included as a satellite boundary to the village.	No change proposed. Consideration of precise settlement boundaries will take place as part of the preparation of the Deposit Plan, in accordance with a Plan wide methodology.
1491	Dunne	Support	Support for Sustainable Settlement Strategy	<p>Support the conformity of approach.</p> <p>C. Housing Growth 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.</p>	Support Noted
34848	Griffith	Object	Objection to East Williamston being classified as a Service Village	<p>East Williamston needs to be removed as a service village, it is a small rural community with very little services.</p> <p>The plan shows the possible sites for more houses, the access road to the village is a single road, by putting more housing around it adds more</p>	

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<u>SP.5 Settlement Hierarchy - A Sustainable Settlement Strategy</u>					
				pressure on our local services and more pressure to the single access road.	The Settlement Hierarchy will be re-assessed in April 2019 to reflect updated information, the review of bus services approved by PCC Cabinet in March 2019 and to assign greater weight to settlements which have access to the National Cycle Network.
34848	Griffith	Object	objection – remove (East Williamston) from the list (of Service Villages)	Remove it from list [officer note: East Williamston]	The Settlement Hierarchy will be re-assessed in April 2019 to reflect updated information, the review of bus services approved by PCC Cabinet in March 2019 and to assign greater weight to settlements which have access to the National Cycle Network.
34889	McIntosh	Object	Object to the position of East Williamston in the Hierarchy	<ul style="list-style-type: none"> •<input type="checkbox"/>One point is awarded for a mobile library. This service, which visits once every three weeks, has been under threat of withdrawal by Pembrokeshire County Council on more than one occasion and its long-term future is by no means assured. Should it be withdrawn, the number of points would be taken below the minimum requirement. •<input type="checkbox"/>Three points are awarded for the community hall. While it is an undoubted amenity, its use is limited because of noise factors, which could affect nearby housing, and its lack of parking already poses problems for local residents. •<input type="checkbox"/>The church (1 point) is very small and has a tiny congregation. It is more of historical interest than a thriving centre of worship. •<input type="checkbox"/>The land on which the children’s play area (2 points) stands is owned by the East Williamston Community and Hall Association, a charity, and is only leased to the East Williamston Community Council. Should this lease be revoked, the two points lost would immediately take the village below the ten point suitability criteria. •<input type="checkbox"/>The two areas of common land (1 point) are extremely small. •<input type="checkbox"/>The mains sewerage and water treatment plant (awarded 2 points when taken together) consists of a small pumping station adjacent to a private dwelling. A number of properties in the village still use septic tanks and, should they all decide to connect to the mains, together with possible areas of new housing, it is of concern that the current works may not be adequate . <p>In short, the ten suitability points appear somewhat unsound. The village of East Williamston contains only one of the ‘Top Level Services’, a Community Hall, whose</p>	The Settlement Hierarchy will be re-assessed in April 2019 to reflect updated information, the review of bus services approved by PCC Cabinet in March 2019 and to assign greater weight to settlements which have access to the National Cycle Network.

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<u>SP.5 Settlement Hierarchy - A Sustainable Settlement Strategy</u>					
				<p>limitations have already been noted, and only one of the 'Prime Services', namely the Children's Play Area. This is remote and is separated from the main body of the village; it is accessed only via a footpath over private land and stands on private land itself.</p> <p>The village has no bus service and, indeed, one of the two roads into the village is marked as unsuitable for heavy vehicles. Both the access roads are single track and the road known as Ford Lane, to the west, is very narrow and has several places where there is no visibility of oncoming traffic. Many residents already decline to use this road. It is however, a unique rural lane whose beauty is appreciated and it would not lend itself to any modifications.</p>	
34880	McIntosh	Object	Object to settlement hierarhcy	<p>The methodology adopted, using a 'scoring' system to categorise rural settlements, does not go far enough towards giving a true reflection of a modern-day settlement.</p> <p>Using a very simplistic and subjective scoring system without any further attempt at 'weighting' skews the resultant score badly. For example, a large church with a healthy weekly congregation of 100 will score identically to a tiny church with 10 regular worshippers attending services one week in four. If a post-office is down-rated in the scoring due to diminishing usage then why not churches which can barely maintain a congregation ?</p>	The Settlement Hierarchy will be re-assessed in April 2019 to reflect updated information, the review of bus services approved by PCC Cabinet in March 2019 and to assign greater weight to settlements which have access to the National Cycle Network.
34880	McIntosh	Object	Object to settlement hierarchy in terms of access to settlements	<p>However, the most obvious defect with the system is one of omission – the scoring system does not address one of the most fundamental issues concerning sympathetic development in rural areas – ACCESS .</p> <p>For example: East Williamston has been scored as a 'service village' with all that that implies under the proposed LDP2. However, the village is accessed by just one minor through-road. This lane is single track, unlit and without any provision (or possibility of provision) for pedestrians or cyclists. The lane to the east carries a 40mph speed limit whilst to the west down a steep hill, between tree-lined banks and ditches it is de-restricted whilst, at the same time signed as 'unsuitable for heavy goods vehicles'. All very pretty but wholly unsafe for walking/cycling – particularly at night. This lane is a regular site for minor accidents usually involving one of two passing vehicles ending in the ditch and a significant number of local residents simply decline to use it.</p> <p>Quoting your Rural Facilities Survey Report: The importance of balancing social, economic and environmental needs as a consideration in where to locate new housing through a settlement strategy is raised in Planning Policy Wales (November 2016, section 9.2.5). Paragraph 9.2.8 suggests using a search sequence "starting with the re-use of previously developed land and buildings within settlements, then settlement extensions and then new development around settlements with good public transport links".</p>	The Settlement Hierarchy will be re-assessed in April 2019 to reflect updated information, the review of bus services approved by PCC Cabinet in March 2019 and to assign greater weight to settlements which have access to the National Cycle Network.

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<u>SP.5 Settlement Hierarchy - A Sustainable Settlement Strategy</u>					
				Clearly East Williamston has little or no prospect of ever being on a public transport link and has no way of creating viable pedestrian/cycle connection to the closest of those links. The settlement is already suffering from an overload of vehicles on its one ancient lane and it is difficult, therefore, to understand the conclusion of the document that it should be deemed a 'service village' "where residential development will be sought to support the LDP strategy"	
34882	Ratcliffe	Object	Object to Pentlepoir position in the Settlement Hierarchy	It is important to highlight that within the Rural Facilities Survey 2018; 2018 Revised Settlement Hierarchy, Pentlepoir is stated to have 119 residents. This is incorrect, the population is far larger, this can be deemed an issue if this is used as a deciding factor as to where to position additional housing.	The Settlement Hierarchy will be re-assessed in April 2019 to reflect updated information, the review of bus services approved by PCC Cabinet in March 2019 and to assign greater weight to settlements which have access to the National Cycle Network.
34411	Reynolds	Support	Support for Settlement Hierarchy	The definition of "sustainability" is constantly evolving. The Country Landowners Association (CLA) has undertaken some interesting research on rural housing allocations across England and Wales (on what is, or can be construed as sustainable). NB I am seeking to gain access to this research to disseminate with the LPA. The focus of the research notes that with technological changes (e.g. internet services) and an increase in flexible and homeworking patterns; greater consideration of these changes should be reflected within rural areas when reviewing housing allocations. Further assessment of the longterm positive impacts from expanding rural towns and villages also needs to undertaken - especially where new allocations (from an increased population) can support existing businesses, such as local shops, public houses, general supporting services, as well as public transport services.	Support Noted
2536	Sinclair	Object	Object to Settlement Hierarchy & Martletwys position	The Village envelope includes land alongside Martletwy House entrance lane. Please be aware that this lane is the only access to extract timber from Martletwy Wood, which is largely managed for forestry. While the bulk of the wood is in the ownership of Martletwy House and is cleared in line with normal rotational forest growth, our portion of the wood contains much larger trees grown on for larger timber stands. Our trees and those of Martletwy House, have to be removed via this lane. The right to extract along this lane is written into deeds for each section of the wood. Please be aware of this when any services are laid underground or above ground to develop new sites along the lane or any alterations are proposed to the lane. It has to be kept clear and remain unaltered for its use by large forestry extraction vehicles and the tackle necessary to enable extraction. Foresters have told us of arriving at sites due for harvesting only to find access lanes blocked, narrowed or filled with service paraphernalia liable	The Settlement Hierarchy will be re-assessed in April 2019 to reflect updated information, the review of bus services approved by PCC Cabinet in March 2019 and to assign greater weight to settlements which have access to the National Cycle Network.

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<u>SP.5 Settlement Hierarchy - A Sustainable Settlement Strategy</u>					
				<p>to be damaged in the process. But they informed us that forestry access takes precedence over any subsequent additions or alterations.</p> <p>While this is information needed at point of development, I would like to register it with the LDP team so they are aware of this possible constraint or consideration .</p>	
1737	Sinnett	Object	Object to the weighting of services where it doesnt recognise more than 1 service exists	<p>The Rural Facilities Survey Report (2018) identifies Letterston along with Crymych, Johnston and Kilgetty-Begelly as Service Centres, which "... remain the most vibrant in terms of service provision within the rural area..." All settlements classed as Service Villages have a score of 30+ in the Rural Facilities Survey, and/or have a population above 1000, and all have a local store, a primary school, good public transport, and a community hall. They are also considered by the Council to be sufficiently far away from main Hub Town settlements to sustain a good supply and include a good demand for services. While Letterston scores well with a population of 1077, one weakness of the Weighted Rural Facilities Survey Results 2018 is that it does not account for the number of each service provided. For instance, Letterston scores 5 points for having a 'Local Store', but the scoring system does not account for the fact that Letterston has three Local Stores, ranking it the same as other settlements with only one such store. This applies to all services listed where the number of a particular service provision is not taken into account. If these factors were incorporated into the Survey, Letterston would have a higher score emphasising its importance as a Service Centre.</p>	<p>The Settlement Hierarchy will be re-assessed in April 2019 to reflect updated information, the review of bus services approved by PCC Cabinet in March 2019 and to assign greater weight to settlements which have access to the National Cycle Network. The purpose of the rural facilities survey is to assess whether a settlement has a broad range of services which taken together ensure its overall sustainability, it is for this reason that a settlement does not get multiple points for repeat services.</p>
1737	Sinnett	Object	Letterston needs housing allocations	<p>In addition to the above, it should be noted that, the WCFG Act, which the LDP must accord with, includes a wide-range of well-being goals. 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 viability of these services. An increase in the older (65+) age groups is estimated within the Demographic Forecasts Paper (July 2018). New development is required to support younger families moving to the area, and is therefore more likely to support the role of Welsh language and culture within these settlements through appealing to a more youthful population profile than currently exists within rural settlements.</p> <p>Without positively allocated land at settlements like Letterston, there would be no further 'planned' housebuilding within the next plan period – running up to 2033. Any housing development would be as a result of 'windfall' development – which has not been positively planned for through the plan-making process. While it is accepted that such development should form part of the Council's supply of housing, the Welsh Government's</p>	<p>As set out in paragraph 6.18 development will be proportional to the size of a settlement, its function and character and based on current service provision. The Settlement Hierarchy will be re-assessed in April 2019 to reflect updated information, the review of bus services approved by PCC Cabinet in March 2019 and to assign greater weight to settlements which have access to the National Cycle Network.</p>

Stakeholder ID	Representor Surname / Organisation	Type of Representation	Representation Summary	Representation Full Text	Officer Response
<u>SP.5 Settlement Hierarchy - A Sustainable Settlement Strategy</u>					
				<p>response to the recent consultation on Technical Advice Note 1 stated that applications being submitted on unallocated sites is “generating uncertainty for communities and is to the detriment of the plan-led system. It is considered that planning authorities should be focusing on the delivery of sites allocated in development plans...”. It is accordingly considered that the positive allocation of housing land at Letterston is required to give the local community greater certainty through the plan-led process.</p>	
1737	Sinnett	Object	Object to the level of growth, should be higher.	<p>In summary, for the reasons outlined above, the Preferred Growth Option is objected to as we consider Growth Option 6: Dwelling – Led (Current LDP) Scenario is the most appropriate to utilise for LDP2. The Preferred Spatial Option is supported, and growth should be directed towards Sageston which has strong service provision and will reduce the need for residents to travel.</p>	<p>No change proposed to the level of growth identified in the Preferred Strategy. As set out in the Preferred Strategy the growth level is slightly above that derived from a 15 year migration trend and in the middle of average completion levels across the last 5 and 10 years. Because the figure is within the range delivered historically by the local building industry, the Authority is confident that it represents a deliverable target. The slightly higher figure will support greater levels of affordable housing and help to ensure a more balanced population profile by 2033.</p>
1737	Sinnett	Support	Support Carew/Sagestons identification in Hierarchy	<p>Carew/Sageston is identified as a Service Village within LDP2, which we support.</p> <p>In addition to the above, it should be noted that, the WCFG Act, which the LDP must accord with, includes a wide-range of well-being goals. Sustainability relates to a number of aspects in addition to accessibility to facilities. Without the provision of new housing at settlements such as Sageston, 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 viability of these services. An increase in the older (65+) age groups is estimated within the Demographic Forecasts Paper (July 2018). New development is required to support younger families moving to the area, and is therefore more likely to support the role of Welsh language and culture within these settlements through appealing to a more youthful population profile than currently exists within rural settlements.</p> <p>Without positively allocated land at settlements like Sageston, there would be no further ‘planned’ housebuilding within the next plan period – running up to 2033. Any housing development would be as a result of ‘windfall’ development – which has not been positively planned for through the plan-making process. While it is accepted that such development should</p>	Support Noted

Stakeholder ID	Representor Surname / Organisation	Type of Representation	Representation Summary	Representation Full Text	Officer Response
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SP.5 Settlement Hierarchy - A Sustainable Settlement Strategy

form part of the Council's supply of housing, the Welsh Government's response to the recent consultation on Technical Advice Note 1 stated that applications being submitted on unallocated sites is "generating uncertainty for communities and is to the detriment of the plan-led system. It is considered that planning authorities should be focusing on the delivery of sites allocated in development plans". It is accordingly considered that the positive allocation of housing land at Sageston is required to give the local community greater certainty through the plan-led process.

No: Candidate Site 002 continues to be supported by the promoter. Land at Sageston (Former National Park Caravan Site) is included in the Candidate Site Register (Ref:002) as a former caravan site being promoted for housing.

The site is identified as falling within the 'Green Category', which comprises residential sites that are compatible with the Preferred Strategy. The site is within a location where residential development will be sought to support the LDP Strategy. Specifically, the site is identified as 'Green 1' due to its location adjacent to a Service Centre boundary and its potential to contribute to meeting housing need.

We support the distribution of growth towards Service Villages and the identification of Land at Sageston (Ref: 002) as a site within the Green Category. The site is sustainable, un-constrained and deliverable.

The site occupies a sustainable location being within walking distance of a wide range of facilities. In summary the site is:

- Clynderwen & Cardiganshire Farmers Ltd – 308ft (1 minute walk)
- Sageston Primary School – 0.3 miles (5 minute walk)
- Plough Inn – 0.3 miles (5 minute walk)
- Carew Memorial Hall – 0.7 miles (13 minute walk)
- Carew Football and Cricket Ground – 0.7 miles (13 minute walk)
- Wesley Chapel – 0.8 miles (16 minute walk)
- Carew Castle and Tidal Mill (and associated Nest Tea Room) – 0.8 miles (16 minute walk)
- Carew Inn (public house) – 0.8 miles (16 minute walk)

There are four bus stops in Carew/Sageston: Bartlett's Well Road; Primary School; Sageston Hall; and Carew War Memorial. There are two bus services, the 360 from Tenby to Pembroke Dock and the 361 from Pembroke Dock to Tenby. The nearest train stations are at Pembroke (4.3 miles, which is a 10 minute drive) and Lamphey (3.9 miles, which is a 10 minute drive). The site has good public transport links and we consider the site to be a sustainable location for development.

This site is the most suitable and sustainable development site in the settlement.

Providing growth in Sageston will assist in offering sufficient demand to support the retention of services and facilities within the settlement.

Directing growth towards settlements with strong service provision also reduces the need for residents to travel.

Stakeholder ID	Representor Surname / Organisation	Type of Representation	Representation Summary	Representation Full Text	Officer Response
<u>SP.5 Settlement Hierarchy - A Sustainable Settlement Strategy</u>					
				<p>The site is sustainably located and there are no technical constraints that could not be overcome or would preclude residential development. Crucially, the site is deliverable as ATEB Group Ltd. own the freehold and it enjoys an extant consent. The proposal moreover would be brought forward by an established local housebuilder / Registered Social Landlord (RSL) with a track record of delivering successful residential schemes within the area. There are no pre-requisite infrastructural requirements to enable the site to be developed. The site is therefore available in the Plan period for development.</p> <p>Developing the site for residential development is in accordance with national policy, the well-being goals and is consistent with the LDP2 strategy and is therefore in accordance with the tests of soundness.</p> <p>Land at Sageston offers a medium-scale site in a sustainable location, which is available and deliverable by ATEB Group Ltd. who are a well-established local housebuilder / RSL with a longstanding reputation of delivering good quality homes in Pembrokeshire.</p> <p>ATEB Group Ltd. would be happy to engage with the Council to discuss the site further for a housing allocation, comprising a mixture of market housing, low cost home ownership and affordable housing.</p>	
1737	Sinnett	Support	Support Letterston as a Service Centre	Letterston remains a Service Centre, which we support.	Support Noted
2497	Wooles	Object	Object to the Settlement Hierarchy position of East Williamston	<p>East Williamston is NOT a service village in that it does not offer a good provision of services and facilities to meet the day to day needs of their population .</p> <p>The village does not offer a local bus service, nor does it have a form of shop/ post office or amenities such like. The sewage system which was installed a few years ago just manages the village as it currently is. There is no pathway to walk from the village to the main road to gain access to the limited bus service in Broadmoor. The single lane road which runs from the village to the A477 cannot cope with additional transport. This would need to be widened to a two lane road therefore causing more harm to the local wildlife environment.</p> <p>Nothing has changed within and around the village since the last LDP about 10 years ago.</p> <p>See above – to provide housing in those areas mentioned above is NOT sustainable with a village that offers so little. This should not be represented again.</p>	The Settlement Hierarchy will be re-assessed in April 2019 to reflect updated information, the review of bus services approved by PCC Cabinet in March 2019 and to assign greater weight to settlements which have access to the National Cycle Network.

SP.7 Main Towns

Stakeholder ID	Representor Surname / Organisation	Type of Representation	Representation Summary	Representation Full Text	Officer Response
<u>SP.7 Main Towns</u>					
1555	Clarke MRTPI	Support	Support SP.7	Policies SP7 and SP8 make reference to providing opportunities for new leisure, recreational, tourist and community facilities.	Support noted.
1475	Edwards	Object	Objection to policy SP 7 - Haverfordwest - requesting further information on the proposed Haverfordwest Town Centre Development Brief	<p>Page 50 paragraph 6.24 states that a Development Brief will be prepared to support the regeneration of Haverfordwest Town Centre.</p> <ul style="list-style-type: none"> • Will this be developed within the plan period prior to Deposit? • The SFCA must be used to inform the brief • We request to be consulted on the brief 	No change to the Preferred Strategy is required in response to this representation. For information - A Development Brief for Haverfordwest is intended to set out specific parameters to guide regeneration proposals. It is currently anticipated that the Development Brief will follow publication of the Deposit Plan. Information available to support, and consultees on the Brief are outside the scope of the Preferred Strategy.
<u>SP.8 Narberth Rural Town, Service Centers and Service Villages</u>					
1555	Clarke MRTPI	Support	Support SP.8	Policies SP7 and SP8 make reference to providing opportunities for new leisure, recreational, tourist and community facilities.	Support Noted
34567	Evans	Object	Object to Para 6.35	Doesn't mention the new hospital that is proposed between Narberth and St Clears which would likely require more housing .	Final decisions on the location of a new hospital are dependent on a successful full business case, which is subject to a Welsh Government decision. There is therefore a lack of certainty about the location, timescale and funding for a new hospital and reference is not appropriate.
<u>SP.9 Local Villages</u>					
34885	Bryant	Object	Amend Para 6.39	<p>Paragraph 6.39 should be amended so that genuine self-build development would be exempted from, or subject to lower, affordable housing contributions subject to controls on occupancy .</p> <p>Paragraph 6.39 refers to 1 – 2 plots being available for self-build in Local Villages. A financial contribution of 50% towards affordable housing is required where market housing is proposed. No distinction is made between developer-built housing and self-build housing in respect of the 50% requirement.</p> <p>Self-build development can be a relatively cheap way for local people to provide their own housing, through labour cost savings by doing much of the work themselves. Any such savings would be lost by having to pay a</p>	No change proposed to the Plan. Delivering affordable housing is a priority for the Authority. Further details on Affordable Housing requirements will be set out in a Supplementary Planning Guidance document which will be published alongside the Deposit Plan and will be based on evidence including viability assessments.

Stakeholder ID	Representor Surname / Organisation	Type of Representation	Representation Summary	Representation Full Text	Officer Response
<u>SP.9 Local Villages</u>					
				50% affordable housing contribution, thus making self-build an unaffordable option.	
				Lowering or removing the affordable housing contribution for local self-build development would make this housing solution viable. It would also be consistent with Community Infrastructure Levy (CIL) Regulations (54A) which exempts self-build housing from CIL charges. A section 106 unilateral undertaking (UU) could ensure that such housing is genuinely built for occupation by the applicant/builder. The UU could specify the initial occupant. It could also ensure that if the property is later sold to someone else, say within 5 years of first occupation, the 50% affordable housing contribution would have to be paid. This would ensure genuine self-build housing that is financially viable.	
1564	Sinclair	Object	Object to SP9 - Local Villages (Clusters)	<p>SP5 Settlement Hierarchy – A Sustainable Settlement Strategy . The number of identified settlements listed under this Policy where windfall, market, housing, local needs affordable housing and exception sites will be permitted is 6 + 1 + 8 + 48 + 58 or 121 which gives a wide range of sustainable settlements throughout the area of LDP2 without having to look for opportunities in ‘hamlets’ .</p> <p>SP6 Settlement Boundaries. Local Village Settlement Boundaries are defined more tightly, limiting opportunities to small scale infill and rounding off, although greater opportunities exist for development in Cluster Local Villages. (Presumably the rounding-off is within the proposed settlement limits)</p>	<p>No change proposed. The Settlement Hierarchy will be re-assessed in April 2019 to reflect updated information, including the review of bus services approved by PCC Cabinet in March 2019 and to assign greater weight to settlements which have access to the National Cycle Network. The exact scale and distribution of housing between settlements will be considered when developing the Deposit Plan. Policy GN.5 has been developed to respond to the Key Issues facing the Plan area, balancing this against the Authority’s duties to protect and enhance the environment.</p> <p>Settlement boundaries will include identified opportunities for infill and rounding off at Local Villages.</p>