

Question 1: Comments made on the Preferred Strategy

Representor – number and name	Comment on:	Remove Include Amend	Comment	Officer Response and Recommendation
1569 Mark Newey, Welsh Government, Plans Branch	0 General		See Appendix 1 for this representation and further clarification.(WG Rep 1)	<p>Welsh Government’s general support for the approach taken noted.</p> <p>Issues regarding housing are addressed later in the schedule.</p> <p>Issues regarding the Environment Act 2016 have required further discussion and correspondence with Welsh Government.</p> <p>Amendments are proposed to the text of the Plan and the Background Paper on Biodiversity.</p> <p>Edits have been done to Policy 8 and the reasoned justification and the reasoned justification of Policy 29 which should address the points raised. The site selection process for the Local Development Plan is set out in Candidate Site Background Paper and the individual site assessments are available to view.</p>
1569 Mark Newey, Welsh Government, Plans Branch	0 General		<p>Review Report</p> <p>In accordance with Regulation 41 of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 (as amended), we note the Authority has undertaken a full review of its adopted Local Development Plan (LDP). The Review Report concludes that a full revision of the plan is required.</p>	Noted.

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1569 Mark Newey, Welsh Government, Plans Branch	0 General		<p>Neighbouring Authorities</p> <p>The Park has set out detailed justification in the Review Report explaining why it would not be appropriate to undertake a joint plan with Pembrokeshire County Council. The Authority has highlighted issues of timing, cost and the need to demonstrate a 5-year housing land supply to explain undertaking their replacement LDP without the County Council whilst continuing further joint working on the evidence base. It is important the Authority provides evidence of this collaborative working (where appropriate) on key issues to ensure a robust evidence base.</p>	<p>Noted. Evidence of collaboration can be found in Background Papers and the content of the Plan itself. Comments received on the Preferred Strategy provide another opportunity to consider issues.</p>
1569 Mark Newey, Welsh Government, Plans Branch	0 General		<p>Flooding</p> <p>The Authority should provide clear evidence on how national flood policy has been considered in the Preferred Strategy and its impact on the site selection process. The Deposit plan must ensure it accords with national policy, principally TAN 15 Development and Flood Risk, which clearly states that highly vulnerable development and</p>	<p>It appears that this comment is seeking deletion of the reference to Welsh Government as both the flood maps and development advice maps are now managed, maintained and published by Natural Resources Wales.</p> <p>Recommend that the reference to Welsh Government is deleted from criterion A of Policy 34. Amendment done.</p> <p>The Welsh Government has also suggested strengthening the policy in line with the national policy.</p>

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			<p>emergency services should not be allocated in Zone C2. Policy 34 Flooding and Coastal Inundation could usefully be strengthened in this respect with reference to the 'Welsh Government's Development Advice Maps' (Criterion A) deleted in-line with the CPO letter dated 27 March 2017</p>	<p>Recommend that a new paragraph is inserted after Policy 34:</p> <p><i>New development will be expected to avoid unnecessary flood risk and to meet the requirements of Technical Advice Note 15 (Flooding). No highly vulnerable development (as defined in Technical Advice Note 15) will be permitted within Zone C2 and development will only be considered in areas at risk of flooding where it can be demonstrated that the site can comply with the justification and assessment requirements set out in Technical Advice Note 15.</i></p> <p>Amendment Done</p>
<p>1569 Mark Newey, Welsh Government, Plans Branch</p>	<p>0 General</p>		<p>Agricultural Land</p> <p>The Candidate Site Assessment Methodology (Appendix D) distinguishes between agricultural land grades 1, 2 and 3a. This approach is contrary to national policy, which identifies all three grades as the best and most versatile (BMV) land and should be conserved as a finite resource for the future (PPW, paragraph 4.10.1). In the Deposit plan, the Authority should evidence the allocation of any sites on grades 1, 2 and 3a BMV land and demonstrate that any loss is minimised and fully justified. We advise that in accordance with TAN 6 (Annex B),</p>	<p>The assessment of candidate sites will be in accordance with national planning policy. The Land Implementation Study provides the evidence for this – see Background Papers.</p>

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			the Authority contact the Environment Division in Welsh Government for information on the quality of agricultural land and location of BMV areas in the Park.	
1569 Mark Newey, Welsh Government, Plans Branch	0 General		<p>Supplementary Planning Guidance (SPG)</p> <p>The preparation and timing of SPG should be linked to the monitoring framework (where applicable), with key guidance available at the Deposit plan stage. SPG adopted under the current plan should be reviewed or updated to ensure it's alignment with the replacement LDP.</p>	<p>It is proposed that an additional indicator be inserted in the Monitoring Chapter to set timescales for the delivery of key supplementary planning guidance.</p> <p>Amendment done.</p>
1663 Dwr Cymru Welsh Water	0 General		<p>I refer to your e-mail dated 25th May 2017 with regard to the above consultation. Welsh Water appreciates the opportunity to respond and we offer the following representation:</p> <p>We welcome the early engagement taking place between the LPA and Welsh Water. In line with paragraph 6.4.2.17 of the LDP Manual (Edition 2, August 2015), these early discussions have enabled us to advise on the capacity available in our infrastructure where future development growth is proposed.</p>	<p>Support for early engagement noted.</p> <p>There will be ongoing engagement with Welsh Water as the Plan is progressed to Deposit. Part of this work involves a commission for a Land Implementation Study to look at issues such as those referenced.</p>

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			<p>In line with paragraph 12.1.7 of Planning Policy Wales (edition 9, November 2016), the LPA should develop a strategic and long-term approach to infrastructure provision. Due to the regulatory and financial framework that we operate within, there is the potential for disparity between LDP timeframes and investment in our infrastructure to accommodate growth through our 5 yearly Asset Management Plans (AMP).</p> <p>Development may therefore need to be phased later in the Plan period to allow the necessary reinforcement works to be delivered through future AMP programmes. Consideration should also be given to the viability of allocations if developers wish to bring forward their site in advance of our capital investment and fund the necessary works themselves.</p>	
<p>1670 Natural Resources Wales</p>	<p>0 General</p>		<p>Thank you for referring the above consultation, which we received on 25 May 2017.</p> <p>We welcome the opportunity to provide comments on the Preferred Strategy (Pre-Deposit Local Development Plan documents).</p> <p>We have also reviewed the</p>	<p>Support for early engagement noted.</p>

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			<p>Sustainability Appraisal (incorporating Strategic Environmental Assessment) scoping report June 2016 and the scoping report Appendix A – Review of relevant plans, policies and programmes.</p> <p>As NRW have been involved in the replacement plan process from the start, we are pleased to see that previous comments made have already been incorporated into the above strategy. Therefore we have only minor comments to make at this stage.</p>	
2373 Theatres Trust	0 General	No		Q1b) Support for the approach taken noted.
2373 Theatres Trust	0 General	No		Q1c) Support for approach taken noted.
2669 Mr M Bell, Campaign for Protection of Rural Wales	0 General		<p>Support improvements:-</p> <ul style="list-style-type: none"> • to the wording of policies which seek to protect the special qualities of the National Park. • other modifications which reflect changes to national policies and organisations, for example in relation to the implications of flooding and coastal inundation (Policy 34 etc.). 	Support noted

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			However I have the following suggestions which seek to improve the clarity of a certain number of proposed policies:-	
2708 Pembrokeshire County Council	0 General		2B first bullet 4B Scale of Growth: PCNPA says that the Park is unable to accommodate all demands for development. If so, where does responsibility rest to meet the shortfall? Is it with the PCNPA, with PCC, or should there be a regional approach to re-apportionment? Given that work for the 2017 National Park Joint Housing Land Availability Study is suggesting a 1.2 year housing land supply in the National Park, the National Park Authority's LDP 2 either needs to have robust policies to address the housing supply shortfall, or propose an alternative means of addressing the issue.	The section on Scale of Growth sets out the issues for this National Park and deals with each in turn. Further explanation is provided in each policy section along with any potential issues arising. In terms of housing land availability the issue the Plan seeks to address is primarily around sites that were anticipated coming forward in the current Plan not coming forward.
2877 Carew Community Council	0 General		Carew Community Councillors discussed the above LDP at their recent meeting. Following full review of the document and its relevance to the Parish of Carew Councillors have no adverse comments.	Noted.
2916 Tenby Town Council	0 General	No No No	-	The commentator requires no amendment to the Preferred Strategy - see comments under Q 2
3458	0 General		TENP supports the Replacement	Support noted.

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			Preferred Strategy which seeks to protect the Special Qualities of the National Park and in particular the recognition that the Plan will need to deal with the impact of climate change on sea levels as described in Policies 34, 34A and 34B	
3468 Ms Mary Sinclair, Campaign for Protection of Rural Wales	0 General		No	Q 1a) Support for approach noted.
3468 Ms Mary Sinclair, Campaign for Protection of Rural Wales	0 General		See Appendix 1 for this representation.	This is a request for the inclusion of a planning policy which seeks to protect agricultural land (grades specified). Planning Policy Wales Edition 9 advises that of the document advises that given that paragraph 4.10.1 of Planning Policy Wales contains statements of national development management policy which should not need to be repeated as local policy in Local Development Plans. A cross reference could be included in the reasoned justification to Policy 7 Countryside. Amendment done. The Authority also needs to consider the implications of this national policy for the selection of sites and in applying the policies of the Plan.
3468 Ms Mary Sinclair, Campaign for Protection of Rural Wales	0 General		1c) Yes - amendments required 1. Separate drafting Comments on behalf of CPRW in an attachment to this form by Executive Member Martin Bell, (above). His comments are referenced to the Plan.	See response to comments submitted by M Bell.
3617 The Coal	0 General		No change needed.	Noted

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Authority (M Lindsley)				
3820 D Hoare	0 General		Question 1: Preferred Strategy Comments a) Anything to remove? YES Plan 142 and 097 should be removed from the LDP replacement.	See response under Question 2
3882 Mr R Wigley-Jones (David D Haward)	0 General		No adverse comment.	Support noted.
4303 Mr & Mrs Hunt	0 General		Question 1: a)Anything to be removed? NO Overall the plan so far is well structured, flows well and has good linkage to national strategy documents to demonstrate an evidence base.	Noted.
4303 Mr & Mrs Hunt	0 General		b) Anything to include - YES Developments should be needs driven rather than target driven. Also they should reflect the wishes of local residents with adequate public consultation to ensure that development are sympathetic and that towns remain attractive places to live and visit.	The Authority is required to comply with national planning policy which expects a level of housing provision to be set out in the Plan based on anticipated general housing growth including affordable housing growth. Such a provision is tempered by and assessment of the suitability of the site for development and its impact on the surrounding area. Proposals are subject to consultation. Wishes of the community can vary and the authority is obliged to seek to achieve a degree of consensus but this is not necessarily possible in all instances.

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4322 Minerals Products Association	0 General		In brief, we are largely supportive of the wording of the preferred strategy. However, it is important that the Authority is clear on housing demand and on the constraints and proposals maps. The publication of these may have a bearing on future representations.	Please see responses elsewhere in this schedule regarding constraints mapping and the proposals map. The Deposit Plan will provide firmer proposals regarding the level of housing development proposed.
4538 Mr & Mrs Armitstead	0 General	No No No	-	The commentators require no amendment to the Preferred Strategy. Comment received relates to the Candidate Site Register – see comments under Q 2.
4540 Richard Hughes	0 General	No No No	-	The commentator requires no amendment to the Preferred Strategy - see comments under Q 2
4545 D Thomas Pembrokeshire County Council	0 General		Please find below a coordinated view of the Council's transport / highway development control / drainage officers on the Replacement Preferred Strategy for the Pembrokeshire Coast National Park Local Development Plan. These comments for consideration are on the Replacement Preferred Strategy and are generally minor or typographical:	Noted
4545 D Thomas Pembrokeshire County Council	0 General		See Appendix 1 for this comment.	Further clarification of these comments from the Highway Authority were sought and it was agreed given the amendments being suggested as a result of other comments made, no further amendments to the document are sought. For full response see Appendix 1.
4555 Mr & Mrs Hughes	0 General		No change needed.	Noted.

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4556 D & M Williams	0 General		No change needed.	Noted
4558 Mr D Morgan	0 General		1a) 1b)1c) No change needed to the Preferred Strategy	Noted
4570 Ms K Whitehead	0 General		<p>Please find below my comments on the Local Development Plan in response to your consultation request. I hope these are of some use.</p> <p>1) I agree with the priority of protecting the special qualities of the National Park. With this in mind, density of housing is a key issue. There are suggestions in the document however that the proposed density of housing is being increased in this Local Development Plan. I am not at all convinced this is desirable. Please see: p20 it states Key Outcomes: a higher density of development is achieved - a minimum of 30 dwellings to the hectare in the Local Development Plan's centres. Also p118 and Policy 44 The Authority will require a minimum density of 30 dwellings per hectare on housing development in the Centres where this is compatible with the character of the Centres. It seems to me that the statement about density being compatible with</p>	<p>The minimum density of housing proposed has been the same as proposed in the current Plan. A check regarding including the reference to compatibility with the character of the Centre has been done and the wording amended to address the concern – see 'New' Policy 45A which provides specific advice.</p> <p>Amendment done.</p>

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			the character of the Centres needs to be repeated in all places where housing density is talked about. Also that the meaning of the statement should be made clearer. I read it as meaning something like the density shouldn't exceed the current density - or maybe should be less if you are moving from the centre of a settlement towards the outside of it. Can this be made clearer and how can this be made to have teeth so that housing density remains in character with an area in our beautiful National Park?	
4570 Ms K Whitehead	0 General		4) Self-catering accommodation brings income into our village as it is often owned by local people. Second homes do not.	Comment noted. The planning system does not allow second homes to be controlled. All that can be controlled in the main is the occupancy of a dwelling as a holiday let or an affordable house or an essential workers dwelling.
4570 Ms K Whitehead	0 General		5) Re sustainability & climate change & reducing the use of transport, more local shops and better transport for villages are desirable, but it's a chicken and egg situation – current public transport is underused and village shopkeepers cannot make a living. Maybe some other communities, which have for instance bought local pubs that were closing, and added a village shop and library to them, can show us the	Comment noted and understood. The Plan does include a positive policy in terms of the provision of community facilities (Policy 48).

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			way here – is there a way to encourage this?	
4579 Mr & Mrs Sharp (David D Haward)	0 General		No adverse comment.	Support noted.
4583 Mr G Elmes	0 General		No change needed.	Support noted.
4590 C and R Stephens	0 General		<p>I would like to raise the following points:</p> <ol style="list-style-type: none"> 1. Inconsistency in planning decisions as perceived by the general public. 2. Once planning has been granted there can be many extra planning applications made on the same property. I understand this is called creeping. 3. Unavailability of a Planning Officer to discuss a planning application, even when you offer the service of discussion in your correspondence. 4. Pre-planning applicants should be obliged to disclose positive and negative comments to the National Park. Everyone close to a proposed development should be contacted. 	<p>Addressing each point in turn:</p> <ol style="list-style-type: none"> 1. It can be difficult without knowing the background as to why one proposal which appears superficially to be similar to another is given a different decision. No detail is provided to explain what in particular is of concern. The Authority publishes an annual monitoring report for the local development plan which highlights and addresses issues arising. 2. There is nothing within legislation which prohibits applicants from submitting further planning applications on a site 3. Officers should be available to discuss relevant issues with applicants/objectors. However, if a case officer is unavailable observations can be put in writing/e-mail and are fully considered by officer. 4. Pre application consultation, developers follow the requirements set by Welsh Government in the Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016. 5. The approach taken to deciding on the number of houses to provide in any Centre is set out in Chapter 4E of the Plan which is subject to comment and challenge to ensure a robust approach is taken.

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			<p>The idea of a pre-planning consultation is to include the community.</p> <p>5. Is sufficient consideration given to the number of houses being built in certain areas of the National Park? e.g. Broad Haven - are another 68 dwellings really needed?</p> <p>6. Outline planning grants a certain number of houses and then, a development, for example, can increase from 8 to 10 to a final application of 18. I have lived in Broad Haven for fifty-seven years, and I can highlight all the developments that have increased in number from their original plan. I am not against change but at what cost to the beauty of the area?</p> <p>7. Finally, I would like to draw your attention to policy 15 of the LDP. I do not believe this is being followed in the development of Broad Haven.</p> <p>Pembrokeshire is a county of great beauty, outstanding landscapes, seascapes and environmentally rich.</p> <p>Come to Broad to see the planners at work.</p>	<p>6. I assume this refers to Full applications submitted after outline granted rather than reserved matters? The local planning authority would consider any proposal against the relevant local plan policies.</p> <p>7. Policy 15 is applied to most applications.</p>

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2708 Pembrokeshire County Council	1.27		It is noted that Conservation Areas are to be shown on the Constraints Map. It might be helpful to include these on the Proposals Map, particularly as their designation is a LPA function (unlike many other elements of what is proposed for the Constraints Map).	Suggestion noted. However, the process of designation is outside the Local Development Plan. Similar issues arise with designating Nature Reserves. The Authority is currently reviewing existing Conservation Area boundaries and considering adding new ones which will complicate matters and possibly date the Proposals Map quite quickly. The Local Development Plan Manual advises that where spatial delineations are determined by other mechanisms they will not need to be shown on the Proposals Map.
4322 Minerals Products Association	1.27	Amend	Constraints Map There is no reference to Minerals Safeguarding Areas under the list of Constraints. Whilst it is recognised that minerals working should only take place under exceptional circumstances, this does not negate the need for the planning authority to safeguard mineral resources and infrastructure as required by paragraph 14.7.3 of PPW. Amendment required Include mineral safeguarding areas to the list of constraints and identify these on the Constraints Map. The plan highlights development needs for the respective settlements, but it is important that these are undertaken in a sustainable manner. To sterilise mineral resources through inappropriate development is not sustainable.	In accordance with the Local Development Plan Manual minerals safeguarding areas will be shown on the Proposals Map at Deposit stage.
4322	1.27		Minerals Safeguarding	Minerals Safeguarding Areas will be shown on the

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Minerals Products Association			It is noted that MSAs are to be identified on the Proposals Map. In light of the above comments we wonder whether the MSAs should be shown on the Constraints Map. Consider including MSAs and associated infrastructure on the Constraints Map	Proposals Map.
1631 Bluestone Resorts Ltd (G Davies)	2 National Park Portrait, Key Issues		See Appendix 1 for this representation	See Appendix 1 for response.
2708 Pembrokeshire County Council	3		Key outcome (8): Consider re-wording, as this sentence doesn't seem to make sense.	Agree. Recommend deletion of words 'which would be'. Amendment done.
2708 Pembrokeshire County Council	3		Key outcome (9): Consider re-wording, particularly if LDP 2 doesn't make any employment allocations.	The outcome would still be valid as provision can be made through criteria based policies.
2708 Pembrokeshire County Council	3		Key outcome (16): Suggest taking out 'have been avoided' and replace with 'were successfully discouraged at pre-application stage'.	Agree amendment suggested. Amendment done.
4545 D Thomas Pembrokeshire County Council	3 Employment objective		" sustainable local economy " needs to be explained	What the Local Development Plan can contribute to a sustainable local economy is amplified through the Plan's vision, strategy and policies.
1670 Natural	3 Key Outcome 8		Preferred Strategy (Pre-Deposit Local Development Plan documents)	Agree. Recommend that Key Outcome 8 is amended by adding

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Resources Wales			Page 19 – Key outcomes (8) States that “No vulnerable development in areas which would be at risk of flooding both now and in the long term”. TAN 15 refers to different levels of vulnerability and your Authority might wish to justify less vulnerable development in flood risk areas. It might be worth wording it as “No Highly Vulnerable development”.	the word ‘highly’ before ‘vulnerable’. Amendment done
1631 Bluestone Resorts Ltd (G Davies)	3 Vision and Objectives		See Appendix 1 for this representation	See Appendix 1.
2708 Pembrokeshire County Council	3.2 Vision		PCNPA says that ‘development continues to respect and where possible enhance the special qualities’. It adds that ‘this means that the Park’s population will not be able to increase significantly’. If more people want to live in the National Park than can be accommodated, this will fuel accommodation price increases and some people will be priced out of the housing market. In that context, should the NPA, as a Local Planning Authority, make provision to meet the housing need?	This is the vision for the area which sets out how much growth could be accommodated before issues arise. Current population projections would not suggest that there is a growth in population and therefore a knock on effect for neighbouring authorities. The focus is on providing affordable housing. The scale of affordable housing need cannot be addressed when past delivery rates of development are factored in. This is a similar issue for most planning authorities. Increasing supply to lower house prices has not been something that has been proven to work over time.

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			Or should PCC, or a regional grouping, make up the shortfall?	
2708 Pembrokeshire County Council	3.4		Vision: Public transport provision in Pembrokeshire is under pressure at the moment, with some recent business closures and route rationalisations. There is an adequate network between main settlements and those places between them, and specialist services for the coast and for school children. Generally, public transport in Pembrokeshire seems to be quite expensive, rather than affordable.	It is acknowledged that as the result of reduced budgets and a large coach company closing last year, routes have been changed and services reduced over the last 5 years. The Local Development Plan looks ahead, however and this section is the Vision section of the Plan – ‘where we want to be’. Despite the reductions to services, there remains functional services between many of the Centres defined in the Local Development Plan which are sufficient to provide an alternative to car travel. The Strategy of the Plan is to direct future growth to settlements which will also help to sustain use of existing services. The comment regarding public transport in Pembrokeshire being expensive is unqualified and appears to be a statement of opinion. The Public Transport team at the County Council advise they set the maximum fares that bus companies can charge and the level is considered to be affordable and is competitive compared with other local authority areas. The Council, however is not able to control the few commercial services that operate in Pembrokeshire, although they are working towards the introduction of a Pembrokeshire Day Ticket which can be used on all routes at an affordable rate.
4545 D Thomas Pembrokeshire County Council	3.4		“Significantly , improved cycle, footway and public rights of way network provide a clean and easily accessible means of transport	Agree with the inclusion of the word ‘footway’ within the sentence. The comma should be removed after the word ‘Significantly’. Amendment done
2708 Pembrokeshire	3.5		It is highly vulnerable development that should be directed away from areas that are or will be prone to	This statement is in the Vision section of the Plan. The intricacies of the policy approach are detailed in the relevant policies of the Plan.

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County Council			inundate or flood. Some less vulnerable developments may be acceptable in flood risk locations, subject to suitable mitigation and there being no significant downstream impacts.	
4545 D Thomas Pembrokeshire County Council	3.6		no mention of a distinct culture	The special qualities of the National Park referred to in the first paragraph of the vision includes cultural heritage – see Policy 8.
2708 Pembrokeshire County Council	3.9		This paragraph seems virtually identical to 2.4.	Agree. Amend to avoid repetition. Amendment done
1569 Mark Newey, Welsh Government, Plans Branch	4		<p>Spatial Strategy</p> <p>All aspects of sustainable development should be taken into account when determining the scale and location of growth. This includes economic, social and environmental factors, supported by the Sustainability Appraisal/Strategic Environmental Assessment. The deposit plan should be clear how the spatial strategy will deliver the Authority's key objectives and state any assumptions and the relationship to the strategy and objectives of the plan.</p> <p>The preferred spatial option is to</p>	See Authority's response elsewhere in this report regarding more detailed queries.

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			<p>maintain the strategy in the adopted LDP with two additional tiers in Rural Centres (Tier 4) and the Countryside (Tier 5). The 'Focused Key Settlement' strategy is predicated on the Wales Spatial Plan</p> <p>Pembrokeshire Haven Settlement Framework and is considered by the Authority to direct development to the most sustainable Service and Local Centres in Tiers 2 and 3 of the hierarchy, whilst sustaining rural communities in Tiers 4 and 5. The Welsh Government supports the ethos of this strategy (subject to the below comments) in line with the principles of sustainable development as set out in national planning policy.</p>	
2708 Pembrokeshire County Council	4 4.13		Add waste and minerals to the second sentence.	The references in the sentence are to do with the types of development where the visual impacts are more likely to have cross boundary implications.
2708 Pembrokeshire County Council	4 4.14		<p>Something could be added on the emerging National Development Framework, which will ultimately replace the Wales Spatial Plan. However, PCC accepts that PCNPA is likely to adopt its LDP 2 before NDF if finalised.</p>	The Authority will monitor progress on the National Development Framework and seek to accommodate change where feasible in advance of placing the Plan on Deposit.
2708 Pembrokeshire	4 4.19		Public transport provision in Pembrokeshire is under pressure	It is accepted that public transport funding has decreased, with the subsequent reductions in service. The focused

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County Council			and subsidies have been reduced, with consequent service rationalisations.	key settlement option makes best use of the levels of public transport that are available and allows for opportunities to sustain services.
2708 Pembrokeshire County Council	4 4.20		Expand the last sentence of this paragraph, to acknowledge that several of the hubs are close to the NP boundary (e.g. Fishguard, Goodwick and Milford Haven).	Agree with edit proposed. Amendment done.
4545 D Thomas Pembrokeshire County Council	4 4.20		it is not explained as to why Fishguard and Goodwick are not Tier one centres	The rationale for choice of Tiers is set out in the Wales Spatial Plan. Web links to the document are provided in the Background Papers. Both Centres are outside the National Park.
2708 Pembrokeshire County Council	4 4.23		Not sure about inclusion of the JUDP strategy as an option – the origins of this strategy are maybe too long ago?	Agree. However, the difficulty is that although the Plan is a replacement Plan there is a need to reflect the previous journey regarding options considered particularly as the strategy remains substantively intact. In reality the only option is the Wales Spatial Plan spatial strategy. Preferred options will be taken forward into the Deposit Plan.
4545 D Thomas Pembrokeshire County Council	4 4.24		Focused key Settlement /hybrid approach 2 - reference is made to the Appraisal process but a line here to explain the term would be beneficial	The text provided in the Plan is considered adequate to explain this spatial strategy approach.
2708 Pembrokeshire County Council	4 4.27		The seasonal visitor population for Tenby should be mentioned and estimated.	Given the assumptions that would need to be made to come up with a figure here such an exercise would be misleading.
2708 Pembrokeshire County Council	4 4.27		Evening and Sunday bus services in Tenby are limited – in fact, not much different to Newport, where these limitations are referenced.	The lack of evening and Sunday bus services was previously raised as an issue by the community of Newport but not in Tenby.
4545	4 4.27		Throughout the document it refers to	Reference is made to visitors in the summer.

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D Thomas Pembrokeshire County Council			residential population there needs to be some reference to the volume of visitors staying within settlements during the summer as this has an impact on services.	
4545 D Thomas Pembrokeshire County Council	4 4.28		Tenby-reference should be made to it being an Active travel settlement, pedestrianisation during the summer and the possibility of extending the length of time it is operating should be included	Agree that reference to the Active Travel can be referenced in paragraph 4.29. The matter of extending the operating time is outside the remit of the land-use planning system. (Amendment done)
2708 Pembrokeshire County Council	4 4.28 and 4 4.29		Has the policy of protection of hotel accommodation resulted in closure without re-use of the affected buildings? If the demand for traditional hotel accommodation has reduced, is it better to seek appropriate re-use of these buildings?	The approach accepts instances where there is still a similar provision in the area available or the proposal is no longer a viable proposition. The approach hasn't seen properties becoming redundant.
1670 Natural Resources Wales	4 4.28 Tenby		Page 28 paragraph 4.28 Issues for Tenby. It states that there are issues in relation to sewage disposal and makes reference to the scale and location of growth background paper. We note that the figures from Dwr Cymru are dated 2015 and might need updating.	The up-to-date advice from Dwr Cymru is that there is capacity within the sewage system to accommodate growth in the town. The inclusion of the sentence is an error. Recommend that the final sentence of paragraph 4.28 is deleted as this is no longer an issue for Tenby. Amendment done
4545 D Thomas Pembrokeshire County Council	4 4.29		Tenby by 2031 reference should be made to the improved access within the town itself and the sustainable transport connections to neighbouring settlements	Agree that reference can be made. Recommend that the paragraph is amended to read: '...Local Service and Tourism Centre. Opportunities for cycling and walking within the town have been greatly

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				<p>enhanced by Active Travel route improvements along with links to neighbouring settlements. The town centre is still....'</p> <p>Amendment done</p>
<p>2708 Pembrokeshire County Council</p>	<p>4 4.3</p>		<p>PCNPA notes that 'opportunities for house building and development more generally are limited'. If we accept that PCNPA has identified what sites it can, how should the shortfall be addressed? Should PCNPA be expected to find further sites in spite of landscape constraints, should PCC make up that shortfall or should there be a regional re-apportionment? Also, if the housing demand is likely to be transferred further afield, possibly out of Wales altogether, is it unrealistic to seek re-apportionment at all and is a different approach needed on housing supply in National Parks across Wales?</p>	<p>In addition to previous comments providing for housing which is not in keeping with National Park purposes would be unlawful.</p>
<p>4545 D Thomas Pembrokeshire County Council</p>	<p>4 4.33</p>		<p>Newport by 2031 "community facilities are adequate to serve the town and hinterland" adequate does not seem a standard to aspire to.</p>	<p>In land use planning terms requiring provision has to be directly related to the needs of the development. The loss of community facilities has to be tempered against the level of provision already there. The term reflects the limits of land use planning. Initiatives to improve provision are welcomed and Policy 48 is a positive policy for encouraging such provision. However, land use planning can't require provision if the provision is adequate to meet the needs of the community. The word 'sufficient' has been inserted which may be less negative in tone.</p> <p>Amendment done.</p>

Representor – number and name	Comment on:	Remove Include Amend	Comment	Officer Response and Recommendation
4545 D Thomas Pembrokeshire County Council	4 4.33 Newport		Accessibility within the town is improved for sustainable travel. This should be included in the policy box	This issue would be covered under criterion e).
2708 Pembrokeshire County Council	4 4.34		The seasonal visitor population for Saundersfoot should be mentioned and estimated.	This figure is not available and cannot be estimated with any degree of accuracy.
2708 Pembrokeshire County Council	4 4.35		Suggest reference is made to the Shoreline Management Plan. In the penultimate sentence, it isn't clear who will need to have a strategy in place to allow Saundersfoot village / community to adapt to sea level rises. Is it PCNPA, PCC, NRW, a partnership or a local community body?	Agree that the responsibility for the strategy is not clear. Recommend that the wording is amended to: 'Saundersfoot village centre may face a potential long-term threat of flooding due to sea level rises (insert footnote to reference Shoreline Management Plan 2) and the community will need support from the local authority and other stakeholders to develop a strategy to allow the village to adapt to changes.' Amendments done
4545 D Thomas Pembrokeshire County Council	4 4.36		Saundersfoot by 2031- Active travel should be mentioned in that it is an active travel settlement . Access improvements introduced for both pedestrians and cyclists with suitable connections to neighbouring settlements and outlying services	Agree that reference can be made. Recommend that the paragraph is amended to read: '...Traffic is well managed. Opportunities for cycling and walking within the village have been greatly enhanced by Active Travel route improvements along with links to neighbouring settlements and outlying services. The village's seaside character...' Amendment done
2910 St Davids City Council	4 4.40 St Davids		4.40 - St Justinians is a major tourist attraction. The questions of parking and traffic management issues are very serious and the Celtic Coaster service has not resolved this issue. This very welcome service makes a	No specific proposals have been presented as Candidate Sites at St Justinians. Speculative proposals coming forward will be judged against the generic policies of the Plan. Pembrokeshire County Council has been undertaking works to Glasfryn Road which in part are linked to relieving congestion in the City Centre.

Representor – number and name	Comment on:	Remove Include Amend	Comment	Officer Response and Recommendation
			minimal overall difference. The need for toilet facilities are not event mentioned. If there can be improved and necessary services for the RNLI, please can the above issues be seriously considered. At peak periods parking and traffic management in St Davids remains a serious issue with little mitigation.	
4545 D Thomas Pembrokeshire County Council	4 4.41		” hotel and guest house accommodation is adequate” adequate does not seem a standard to aspire to	The reference in this instance refers to the amount of accommodation rather than the standard. In this sense the term used is correct but could be clarified by changing it to ‘sufficient’. Agree amendment done.
4545 D Thomas Pembrokeshire County Council	4 4.41		“Traffic management measures have mitigated the adverse impacts of through traffic and traffic movements within the town City.....	Agree amendment done.
2708 Pembrokeshire County Council	4 4.44 Newgale		Strongly support the suggestion in the last sentence that the outcomes of PCC-led proposals to address marine inundation issues at Newgale will be taken account of in preparing the PCNP LDP 2 – if these are available in time.	Noted.
4545 D Thomas Pembrokeshire County Council	4 4.44 Newgale		A study prepared for Pembroke County Council has highlighted that the current coastal defences have a limited life span with consequential effects on the village and main road (A478)a running along the coast. Pembrokeshire county council in	Agree. Further suggest that reference is made also to ‘other stakeholders’. Recommend that the sentence is amended to read: “Pembrokeshire County Council in consultation with the local community and other stakeholders, is progressing work to address these issues.....”

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			consultation with the local community are progressing	Amendment done
2708 Pembrokeshire County Council	4 4.57		The difficulty in prioritising employment-related conversions of buildings in the countryside is noted. It is accepted that other options may need to be examined.	Commented noted. The many options considered are set out in the Authority's Sustainability Appraisal and the Alternative Options Background Paper. The preferred option is set out in the text of the Preferred Strategy.
2708 Pembrokeshire County Council	4 4.6		PCNPA says that account needs to be taken of the position of the National Park relative to neighbouring authorities. This is in the context of both level of growth and spatial distribution. Is PCNPA suggesting that PCC should take on some of the development needs arising in the National Park in areas such as housing development? This happens for some topic areas already – minerals and waste, for instance, but not hitherto for housing. This probably needs all-Wales / regional consideration.	Chapter E Affordable Housing and Housing sets out the growth options for the National Park. The Candidate Site analysis – as it currently stands- would suggest that growth can be accommodated within the National Park. There would be concern if no allocations could be pursued in the South East of the County but there are options to explore at present. Housing allocations are provided to deal with affordable housing need in the local area so it is difficult to see how this issue is of a regional standing. In a previous Plan (the Joint Unitary Development Plan) growth was pursued outside the National Park.
2708 Pembrokeshire County Council	4 4.61		The use of conditions doesn't really address the second home issue, as those with more than one property will simply transfer on a temporary basis from one to another to meet any occupancy restrictions. Across Wales, the second homes issue is now being tackled through fiscal measures (Council Tax increases for second homes) rather than through the planning system.	The comment related to the use of the proposal under consideration. Agree the second home issue is a wider issue. Reference deleted.

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1670 Natural Resources Wales	4 4.62		Page 40 paragraph 4.62 refers to Supplementary Planning guidance on habitats and species being prepared. What are the timescales for this?	The intention is to concentrate on the preparation of supplementary planning guidance after the Plan is adopted (post 2019).
4545 D Thomas Pembrokeshire County Council	4 4.8		Accessibility is not a priority issue this needs to be addressed	4.8 c) as a heading should refer to 'Community Facilities, Retailing and Transport .' Transport includes accessibility amongst other matters. Amendment done
1663 Dwr Cymru Welsh Water	4 C		Priority C: Climate change, sustainable design, flooding, sustainable energy We welcome the introductory supportive text at paragraph 4.149 of this section of the Preferred Strategy, which indicates that the LDP supports sustainable locations for development by locating housing and other development adjacent to services.	Support noted.
1663 Dwr Cymru Welsh Water	4 C Policy 29		Policy 29 – Sustainable Design We are fully supportive of the requirements of this policy. A key component in a location being defined as sustainable is the provision of water and sewerage infrastructure, as such we are pleased to see the inclusion of criteria h), water and drainage.	Support noted
1663 Dwr Cymru	4 D Policy 38A		Policy 38A – Caravan, Camping and Chalet Development	Dwr Cymru/Welsh Water is routinely consulted on planning applications and will have the opportunity to

Representor – number and name	Comment on:	Remove Include Amend	Comment	Officer Response and Recommendation
Welsh Water			As with renewable energy proposals, where there is development that would affect our infrastructure, we would request that they are protected accordingly.	identify where infrastructure requires protections from development.
4570 Ms K Whitehead	4 E Housing		<p>2) The Local Development plan acknowledges that there is no need for new houses in the National Park as the population is not increasing, but takes the view that Registered Social Landlords and the Housing Authority cannot be relied on to increase affordable housing, and that therefore house building must be allowed as builders of new houses are required to make a contribution to affordable housing.p115. How topsy turvey is that?</p> <p>There's a whole raft of other ways of looking at it (though I acknowledge not all of these are within the remit of the planning authority): - how can we exert a downward pressure on house prices by discouraging 2nd home owners?, can we favour purchase of existing properties for renting to local people?, can we enforce the renting of affordable housing to local people – which some local housing associations are rumoured to deliberately flout (is</p>	<p>Within the confines of what national planning allows for and the funding available there needs to be cross subsidy.</p> <p>More macro solutions would need to come from government and are not within the powers of this Authority.</p> <p>Housing associations do have voluntary local lettings agreements. The management of housing association properties is a matter for housing associations. The Authority can control the occupancy of private affordable rented properties which are built under the planning system. The Authority's Supplementary Planning Guidance provides advice regarding the definitions. The control of Low Cost Home Ownership properties is difficult as set out in the text of the Plan.</p> <p>Housing Associations are generally not in favour of taking on conversion opportunities.</p> <p>The Authority's attempts to introduce a local needs policy in an earlier Plan have not been successful. National planning policy in this respect has not changed.</p>

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			<p>there a local lettings policy and how local is local, as the perceived need locally is for people to be able to live very locally in/near the village they grew up in)?, can we favour conversion projects that provide affordable housing for local people? (good to see that affordable housing would take priority over self-catering in building conversions), can we exert pressure on Pembs CC to provide more affordable housing or on the Welsh Assembly to assist this?, can we favour planning applications for young people who want to stay in the area they grew up in? Also to be noted that “affordable” is not actually affordable for local people – this is of course a national issue.</p>	
<p>1663 Dwr Cymru Welsh Water</p>	<p>4 E Policy 46</p>		<p>Policy 46 – Gypsy and Traveller sites Should any gypsy and traveller sites propose to connect to our infrastructure then an assessment will need to be undertaken to determine if there is enough capacity available.</p>	<p>Noted.</p>
<p>1663 Dwr Cymru Welsh Water</p>	<p>4 F Community Facilities</p>		<p>F. Community facilities and infrastructure – preceding text We support the provisions of this policy, though we would recommend</p>	<p>Agree amendment done.</p>

Representor – number and name	Comment on:	Remove Include Amend	Comment	Officer Response and Recommendation
			the inclusion of the following wording to paragraph 4.320 - footnote 200, "...including travel schemes, allotments, water and sewerage infrastructure and sustainable urban drainage systems."	
339 Mrs S Bayes	4 Newport		See Appendix 1 for this representation.	See Appendix 1 for this response.
4545 D Thomas Pembrokeshire County Council	4 Policy 2		No mention of protecting the dune system just west of Tenby only the harbour area	The reference to protecting the harbour at Tenby is as a facility for the town and not coastal protection. No specific proposals for coastal protection have been submitted for inclusion in the Plan and proposals for coastal defences are considered against the generic policies of the Plan and in line with the policy approaches set out in the Shoreline Management Plans.
1092 Bourne Leisure (Lichfields)	4 Policy 2 Tenby	Include	Policy 2 is quoted by the commentator. Paragraph 4.28 which supports draft Policy 2 recognises that "Tenby has suffered some decline in tourism". However, it goes on to state that "Tenby continues to be a significant visitor centre as highlighted in the Wales Spatial Plan update". Supporting paragraph 4.29 notes the aspiration that by 2031, Tenby will be a "quality tourism destination with a range of accommodation". Tenby is the only local service and tourism centre identified within the draft LDP and is therefore seen as	The designation of Centres as set out in the Local Development Plan reflects the existing size of the Centres and their existing roles. The designations also reflect their size relative to other Centres in the Spatial Plan area. The issues for each Centre dictate the level of growth envisaged. To suggest that a more substantive growth in the tourism offer is not seen as the way forward for these Centres.

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			<p>the main tourism centre within Pembrokeshire Coast National Park. Bourne Leisure considers that the vitally important role of tourism in Tenby should be recognised within draft Strategy Policy 2, in order to reinforce the potential for an increase in tourism-related expenditure within the local economy. The policy should therefore prioritise the development of appropriate tourist accommodation development within Tenby – both in the centre and in areas supporting the centre. This will contribute towards the aspiration for Tenby to become a “quality tourism destination with a range of accommodation by 2031”, as set out within supporting paragraph 4.29. Bourne Leisure therefore requests that the following is identified as a land use priority within draft Policy 2: “to support and encourage development relating to tourist accommodation and visitor facilities.”</p>	
339 Mrs S Bayes	4 Policy 3 Newport		See Appendix 1 for this representation.	See Appendix 1 for this response
3686 Matthew Baker	4 Policy 3 Newport		Please see Appendix 1 for representation.	The designation of Centres as set out in the Local Development Plan reflects the existing size of the Centres and their existing roles. The designations also reflect their

Representor – number and name	Comment on:	Remove Include Amend	Comment	Officer Response and Recommendation
Caravans Ltd (Geraint John Planning)				size relative to other Centres in the Spatial Plan area. The issues for each Centre dictate the level of growth envisaged. To suggest that a more substantive growth in the tourism offer is not seen as the way forward for these Centres.
1487 Pembrokeshire Housing (Geraint John Planning)	4 Policy 5 St Davids	Amend	See appendix 1 for this representation.	The designation of Centres as set out in the Local Development Plan reflects the existing size of the Centres and their existing roles. The designations also reflect their size relative to other Centres in the Spatial Plan area. The issues for each Centre dictate the level of growth envisaged. To suggest that a more substantive growth in the tourism offer is not seen as the way forward for these Centres.
4545 D Thomas Pembrokeshire County Council	4 Policy 5		Policy box 5 should contain a reference to Sustainable travel walking and cycling and accessibility	Achieving this would be contained in improved traffic management proposals under criterion e).
4582 Swangate Developments Limited (Geraint John Planning)	4 Policy 5 St Davids	Amend	See appendix 1 for this representation.	The designation of Centres as set out in the Local Development Plan reflects the existing size of the Centres and their existing roles. The designations also reflect their size relative to other Centres in the Spatial Plan area. The issues for each Centre dictate the level of growth envisaged. To suggest that a more substantive growth in the tourism offer is not seen as the way forward for these Centres.
1569 Mark Newey, Welsh Government, Plans Branch	4 Policy 6		Rural Centres (Tier 4): We note from Table 6 (LDP, page 119) that 34% of growth is proposed in Tier 4. The role and function of settlements and capacity to accommodate new housing development (LUC, update March	Amendments are proposed that should address the concerns raised. Amendment done.

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			<p>2017) has been a key consideration in the identification of 33 new Tier 4 Rural Centres in Nevern, Stackpole, Lydstep and Rosebush. Some of the Rural Centres have no accessibility other than by private car (Sustainable Transport Paper) with the settlement form often very small and linear, for example in Pontfaen and Nevern. National policy sets out the sustainability principles that should be considered when locating new development, including good accessibility on foot, by bicycle and public transport (PPW, 4.7). To deliver on the issues the plan is seeking to address, the Deposit plan should ensure all Rural Centres identified for housing and employment growth in Policy 6 can be justified in line with national policy. The Authority should explain how development can be controlled in these settlements. Will all Centres have settlement boundaries? The Authority should explain if the use of settlement boundaries for all Rural Centres is appropriate in line with TAN 6 (paragraph 2.2.4).</p>	
2708 Pembrokeshire	4 Policy 6		Carew, Crymych, Hill Mountain and Llanychaer could also be considered	Crymych lies higher up the spatial hierarchy and commentary is provided just before the section on Rural

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County Council			to be split settlements. In the first three cases, these are predominantly in PCC's planning jurisdiction.	Centres. Carew has been added to the list in Policy 6. Hill Mountain consists of discrete areas of development rather than a split settlement and would be considered under the countryside policy. That part of Llanychaer is a split settlement but has insufficient facilities overall to be included in Policy 6.
4447 Mr J Dyer (Harries Planning Design Management)	4 Policy 6	Amend	LDP Policy 6 (Rural Centres) – inclusion Of Mynachlogddu. Mynachlogddu should be included as a Rural centre as it contains 3 of the facilities cited in the preferred strategy and associated background paper on the scale & location of growth (para 67) as normally found in a small settlement. Specifically, Mynachlogddu contains a place of worship, post box and sports/recreation ground, in addition the village also contains cemetery and telephone box	Agree. Inset to be prepared and the Centre listed in Policy 6 (amendment done) .
4545 D Thomas Pembrokeshire County Council	4 Policy 6		Rural centres in the national park does not include Porthgain and Nolton Haven	Nolton Haven and Porthgain will be included in Policy 6 (amendment done) and an Inset Map prepared for each. Castlemartin and Wiseman's Bridge should also be included (amendment done to Policy 6 and Inset Maps) .
4576 Mr Bowen (Asbri Planning)	4 Policy 6 Broad Haven	Amend	See appendix 1 for this representation. Include Broad Haven as a Tier 3 rather than a Tier 4 Settlement.	There are a range of sizes of Centres in this Tier. However, there is a distinction to be made between these centres and those already in Tier 3. The Scale and Location of Growth Paper provides the evidence.
1569 Mark Newey, Welsh	4 Policy 7		Countryside (Tier 5): In the countryside, Policy 7 permits infilling and rounding-off of up to 2	An amendment is proposed to address these concerns. Amendment done.

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Government, Plans Branch			market houses in isolated groups of dwellings. The Welsh Government does not object with the principle of this approach, however, the Deposit plan should be clear that new homes in the countryside (Tier 5) will require special justification in the first instance, such as affordable housing to meet local need or rural enterprise dwellings. For example, why is the Authority allowing market housing in the first instance and not looking for affordable housing as PPW (paragraph 9.3.2) suggests? This is pertinent to the plan as the delivery of affordable housing is a key element of the strategy.	
2708 Pembrokeshire County Council	4 Policy 7		This policy should also make reference to the potential for renewable energy proposals in countryside locations, linking to Policy 33.	Agree to inserting this cross reference. Amendment done.
1092 Bourne Leisure (Lichfields)	4 Policy 7 Countryside	Include	Policy 7 – Countryside (Tier 5) (Strategy Policy) Draft Policy 7 sets out the forms of development that will be acceptable, in principle, in the countryside, i.e. outside of the identified centres. There is no reference to tourism within the draft policy. Tourism is recognised as a major provider of local employment in rural areas, which also attracts significant	The current wording of Policy 7 e) is considered appropriate.

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			<p>investment. Tourist accommodation is often found away from centres and edge-of-centre locations due to its often close functional and visual relationship with the countryside and the sea. Supporting paragraph 4.48 recognises that the National Park countryside is an important contributor to tourism.</p> <p>Bourne Leisure considers that draft Policy 7 should recognise the importance of the tourism industry for rural economies and should support the ability of the industry to respond to the changing demands and needs of the sector, through sustainable development within the defined countryside, in order to promote economic growth in rural areas.</p> <p>Bourne Leisure therefore requests that the following is identified as a land use priority within draft Policy 7:</p> <p><i>“to support and encourage development relating to tourist accommodation and visitor facilities”</i></p>	
2669 Mr M Bell, Campaign for Protection of Rural Wales	4 Policy 7a)		Policy 7a) Countryside, where there is a relaxation which would allow residential development in locations which are not served by public transport.	The ‘Pembrokeshire County Council option’ has been assessed alongside numerous other options in the Plan’s sustainability appraisal and Alternative Options background paper. On balance the preferred option is that which is set out in the Plan with the benefit of

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			<p>In particular I would suggest that affordable housing, however generated, is best located in affordable locations ie those which have easy access to schools, employment, shops etc.</p> <p>In this context there are likely to be fewer bus services in the future and the decline in the presence of shops and other private and public services in rural area is more likely to continue than to be reversed which taken together would increasingly make isolated locations less sustainable.</p> <p>Compatibility with PCC's LDP on residential development would seem appropriate.</p>	comment from Welsh Government.
<p>1092 Bourne Leisure (Lichfields)</p>	<p>4 Rural Centres Policy 6</p>	<p>Include</p>	<p>Policy 6 - Rural Centres (Tier 4) (Strategy Policy) Draft Policy 6 states: “In Rural Centres the land use priorities will be: a “to provide for and or permit housing to facilitate the delivery of affordable housing for the local area b to permit small scale employment developments c to protect and enhance the centre’s range of facilities”.</p> <p>Tourism development is recognised as a major provider of local</p>	<p>Cross referencing has been included in the policy wording. Amendment done.</p>

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			<p>employment in rural areas, which also attracts significant investment. Technical Advice Note 6, in particular advocates the importance of providing employment opportunities to achieve sustainable rural communities.</p> <p>Bourne Leisure considers that draft Policy 6 should support the tourism industry in terms if it responding to the changing demands and needs of the sector, in order to promote economic growth in rural areas. Bourne Leisure therefore requests that the following is identified as a land use priority within draft Policy 6: “to support and encourage development relating to tourist accommodation and visitor facilities”</p>	
2527 Mr T Thomas	4 Tenby		Supporting representation for the Tenby Civic Society submission.	Please see response to the Tenby Civic Society Submission.
3511 Tenby Civic Society (H Gardiner)	4 Tenby	Include	See Appendix 1 for this representation	<p>Most of the amendments have been done as suggested apart from those that were difficult to insert in a land use planning document, were unlikely to be able to be addressed or are already encompassed within existing wording.</p> <p>Amendments done.</p>
1663 Dwr Cymru Welsh Water	4?		<p>Spatial Strategy</p> <p>We note that the Spatial Strategy is the same as it is in the current iteration of the LDP and are</p>	Noted

Representor – number and name	Comment on:	Remove Include Amend	Comment	Officer Response and Recommendation
			supportive of this approach. We would advise that the LPA take into account our comments at the Candidate Sites stage of the process with regard to the capacity of our infrastructure.	
1569 Mark Newey, Welsh Government, Plans Branch	4A Policy 12		<p>Welsh Language</p> <p>Policy 12 Development in Welsh Language Sensitive Areas will ‘normally’ apply to Community and Town Council areas with 30% or more Welsh speaking population. What does normally mean? The Authority acknowledges that “where Community Council averages do not reflect the existence of concentrations.....a more qualified and sensitive measurement will be required” (LDP, paragraph 4.77). Clarification is required on this approach. Do Community Council areas align with the settlements in the plan? In essence it should be clear as to where Policy 12 will apply. Policy 12, and the proposals map, should clearly identify Welsh language sensitive areas, ensuring consistency with neighbouring plan areas, where appropriate.</p>	<p>Further investigation of the 2011 Census figures has shown that the proportion of Welsh speakers within the Census Output Areas (the smallest areas for which figures are available) aligns with the figures for the Town and Community Council areas. There were no smaller pockets of a higher threshold identified outside of the areas already defined for application of this policy. As a result of the comment from Pembrokeshire County Council, the threshold for the policy application has been reduced to 20%. A map showing the area within which the policy will apply has been included in the Welsh Language Background Paper and the same area will be identified on the Proposals Map at the Deposit stage.</p> <p>Given the relatively low threshold and the lack of evidence to demonstrate small concentrations of Welsh speakers outside of the identified area it is recommended that the second sentence of paragraph 4.81 of the Preferred Strategy is deleted. A new sentence to advise that the policy application area is shown on the Proposals Map will be added.</p> <p>Amendment done</p>
2708 Pembrokeshire	4A 4.77		The PCNPA is normally applying the policy in Town and Community	It appears that Pembrokeshire County Council is using 25% as the figure as, rounded up, it was the average for

Representor – number and name	Comment on:	Remove Include Amend	Comment	Officer Response and Recommendation
County Council			Council areas with 30% or more Welsh speaking population. PCC uses more than 25% of population over the age of 3.	<p>Pembrokeshire in the 2001 Census (23.9%). The 2011 Census shows a decline in the number of Welsh speakers in Pembrokeshire to 19.2%. On this basis it would be reasonable to reduce the policy threshold to 20%. Recommend that paragraph 4.77 of the Plan is amended to refer to application of the policy in Community and Town Council areas with 20% or more Welsh speaking population as identified in the 2011 Census.</p> <p>Amendment done</p>
2708 Pembrokeshire County Council	4A 4.96		The PCNPA says that ‘Development outside the National Park may have an impact on the qualities of the National Park and the NPA will use the same principles as set out in Policy 15 when commenting on proposals outside of the National Park’. The NPA is entitled to take this approach, but its inclusion seems to go beyond what should be in a LDP Preferred Strategy.	<p>The Local Development Plan Manual at paragraph 2.3.1 advises that: ‘The strategy and the policies of the Local Development Plan should: i. relate to the geography of the area and be founded on physical and demographic characteristics, internal and external connections and relationships with neighbouring areas.’ Under the requirements of the 1995 Environment Act Pembrokeshire County Council is also required to have the same regard for Park Purposes as the National Park Authority.</p> <p>This is the current approach in the adopted Local Development and previous Plans. Pembrokeshire County Council’s Local Development Plan recognises the need to consider impacts on the Pembrokeshire Coast National Park approach as set out in GN1 General Development Policy criterion 3. It has worked well in practice providing a clear and transparent context for example when considering this Authority’s response to wind turbine proposals coming forward in the Council’s jurisdiction.</p>
1092 Bourne Leisure	4A Policy 10 4A Policy 11		Policy 10 – Local Sites of Nature Conservation or Geological Interest	Support noted.

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(Lichfields)			<p>and Policy 11 – Protection of Biodiversity Draft Policy 10 states: “Development that would be liable to harm the nature conservation value of a Local Nature Reserve or other site of local nature conservation interest, or the main features of interest within a Regionally Important Geodiversity Site, will only be permitted where the effects can be acceptably mitigated through careful design, work scheduling or other measures. Wherever possible opportunities for enhancement should be explored.” Draft Policy 11 states: “Development that would disturb or otherwise harm protected species or their habitats or the integrity of other habitats, sites or features of importance to wildlife and individual species will only be permitted where the effects will be acceptably mitigated through careful design, work scheduling or other measures. Wherever possible opportunities for enhancement should be explored.” Bourne Leisure supports draft Policies 10 and 11 as they refer to permitting development where the effects can be acceptably mitigated through careful design, work</p>	

Representor – number and name	Comment on:	Remove Include Amend	Comment	Officer Response and Recommendation
<p>1569 Mark Newey, Welsh Government, Plans Branch</p>	<p>4A Policy 10</p>		<p>scheduling or other measures.</p> <p>Natural Environment</p> <p>As currently worded, Policy 10 provides criteria on development likely to affect local designations, such as Local Nature Reserves and Regionally Important Geodiversity Sites (RIGS). In addition to local designations, planning policy requires that LDPs identify all international and national designations, including Special Protection Areas (SPA), Special Areas of Conservation (SAC) and listed Ramsar sites (PPW, paragraph 5.4.5). To align with national policy, the Deposit plan should identify any such designations in Policy 10 (where appropriate) and provide criteria against which development will be assessed that is proportionate to the level of designation being considered.</p> <p>Further clarification WG: Natural Environment –The requirement in PPW (paragraph 5.4.5) is to identify international, national and local designations and it should be clear to which areas this protection would</p>	<p>A policy approach similar to that used by the Vale of Glamorgan’s adopted Local Development Plan is being inserted in the Plan.</p> <p>Amendment done.</p>

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			<p>apply. Boundaries identified by bodies outside the Authority will not generally need to be shown on the proposals map but could usefully be contained on the constraints map or in SPG (with a link from the reasoned justification in policy). International and national designations (where applicable in the Park) will not generally be subject to change. For assistance on policy criteria affecting different levels of designations, please see the adopted Vale of Glamorgan LDP.</p>	
<p>3372 Raymond and Raymond (Paul Hales)</p>	<p>4A Policy 10</p>	<p>Amend</p>	<p>Policy 10 - It is proposed that the wording of this policy is changed by inserting “significantly” before “harm”. The wording of policy 10 as proposed in the emerging plan would mean that the policy would apply even where any harm to conservation value was insignificant which seems to be unnecessary.</p>	<p>The Plan has been reviewed to ensure that there is a consistency of approach where policies refer to assessing impacts. Terms have also been explained in the Glossary of Terms. Amendment done.</p>
<p>3372 Raymond and Raymond (Paul Hales)</p>	<p>4A Policy 11</p>	<p>Amend</p>	<p>Policy 11 - It is proposed that the wording of this policy is changed by inserting “significantly” before “disturb” The wording of policy 11 as proposed in the emerging plan would mean that the policy would apply even where any disturbance to protected species or their habitats that was insignificant which seems to be unnecessary.</p>	<p>The Plan has been reviewed to ensure that there is a consistency of approach where policies refer to assessing impacts. Terms have also been explained in the Glossary of Terms. Amendment done.</p>

Representor – number and name	Comment on:	Remove Include Amend	Comment	Officer Response and Recommendation
			Apart from the comments above my clients are fully supportive of the Preferred Strategy.	
1092 Bourne Leisure (Lichfields)	4A Policy 12		<p>Policy 12 – Development in Welsh Language-Sensitive Areas Draft Policy 12 states: “Unanticipated development proposals within the identified Welsh Language-Sensitive Areas, development which are considered likely to have a significant effect on the Welsh language will be subject to a Language Impact Assessment, setting out the measures to be taken to protect, promote and enhance the Welsh language. Mitigation measures can reduce or eliminate potential adverse impacts of development on the Welsh language. However, where development can reasonably be shown, on planning grounds, (for example, the scale of development proposed) to cause harm to the continued role and well-being of the Welsh language within that community, the National Park Authority will resist such development.” Supporting paragraph 4.80 makes clear that the National Park Authority will be responsible for undertaking any Welsh Language Impact</p>	<p>Further investigation of the 2011 Census figures has shown that the proportion of Welsh speakers within the Census Output Areas (the smallest areas for which figures are available) aligns with the figures for the Town and Community Council areas. There were no smaller pockets of a higher threshold identified outside of the areas already defined for application of this policy. As a result of the comment from Pembrokeshire county Council, the threshold for the policy application has been reduced to 20%. A map showing the area within which the policy will apply has been included in the Welsh language Background Paper and the same area will be identified on the Proposals Map at the Deposit stage.</p> <p>Given the relatively low threshold and the lack of evidence to demonstrate small concentrations of Welsh speakers outside of the identified area it is recommended that the second sentence of paragraph 4.81 of the Preferred Strategy is deleted. A new sentence to advise that the policy application area is shown on the Proposals Map will be added.</p> <p>Amendments done.</p>

Representor – number and name	Comment on:	Remove Include Amend	Comment	Officer Response and Recommendation
			<p>Assessment and for determining its form. However, the supporting paragraph is not clear on the form of the language impact assessment that will be required or the matters that will be taken into account. Such an assessment should be proportionate to the development proposed and should reflect the type of development planned.</p> <p>Supporting paragraphs 4.77 and 4.81 note that the policy will apply in Community and Town Council areas with 30% or more Welsh-speaking population. It is further noted that where the Community Council average does not reflect the existence of concentrations of Welsh speakers, a more qualified and sensitive measurement will be required. This is unclear.</p> <p>Bourne Leisure requests that further text is added to supporting paragraph 4.77 and / or 4.81 in order to explain what a more qualified and sensitive measure will entail. Such details should include:</p> <ol style="list-style-type: none"> 1 Who will be responsible for determining a more qualified and sensitive measure; and, 2 What such assessment will entail. <p>Bourne Leisure considers that any assessment should be undertaken in</p>	

Representor – number and name	Comment on:	Remove Include Amend	Comment	Officer Response and Recommendation
			a proportionate way on a case by case basis, taking into account the development proposed.	
2669 Mr M Bell, Campaign for Protection of Rural Wales	4A Policy 12		Policy 12 Welsh language Sensitive Areas. 2 nd and 3 rd line , <i>developments</i> as unnecessary	Agree. Recommend that the word ‘developments’ in the 1 st paragraph of policy 12 be deleted. Amendment done.
2708 Pembrokeshire County Council	4A Policy 12		The wording could be simplified, especially in the 1 st paragraph.	The policy reflects extensive liaison with Welsh Government.
1092 Bourne Leisure (Lichfields)	4A Policy 15 Conservation and Enhancement of the National Park		Bourne Leisure understands the importance of protecting the National Park’s qualities and special landscape and seascape character. As many of Bourne Leisure’s sites are located in rural and/or coastal areas, incorporating or adjacent to environmentally and ecological sensitive sites, the Company has significant experience of operating within and adjacent to such locations and takes the need for conservation and enhancement fully into account – both in day to day operations and when preparing development proposals for sites. Bourne Leisure considers that there are circumstances where development can be appropriate when it has an impact on special landscape and seascape character,	The Plan has been reviewed to ensure that there is a consistency of approach where policies refer to assessing impacts. Terms have also been explained in the Glossary of Terms. Amendment done.

Representor – number and name	Comment on:	Remove Include Amend	Comment	Officer Response and Recommendation
			<p>if adequate mitigation measures are provided. Accordingly, Bourne Leisure considers that it is important for draft Policy 15 to include a clear provision whereby development proposals can be considered on a case-by-case basis, taking into account any mitigation measures provided.</p> <p>Bourne Leisure therefore requests that the following additional wording is added to draft Policy 15: <u>“Development proposals will be considered according to the above criteria, and in relation to appropriate mitigation measures which address any negative impacts on the qualities and special landscape and seascape character of the Pembrokeshire Coast National Park.”</u> [proposed amendments underlined].</p>	
1631 Bluestone Resorts Ltd (G Davies)	4A Policy 15		See Appendix 1 for this representation	This representation relates to the detailed content of the Landscape Character Supplementary Planning Guidance. As detailed in paragraph 4.91 of the Preferred Strategy the Supplementary Planning Guidance will be updated and taken forward under the replacement Plan.
1569 Mark Newey, Welsh Government, Plans Branch	4A Policy 16		Green Wedges: The Authority has applied its green wedge self-assessment criteria to 94 potential sites, which has reduced the number of proposed areas to 43 (Green Wedge Review, Appendix A). Whilst the Assessment has	The existing Green Wedges have been reviewed further in light of this response to assess their need. This further work has resulted in two more Green Wedges being removed (both in Dinas Cross) and two amended to reduce their area (in Dinas Cross and Marloes). The Green Wedge Background Paper has been updated to reflect this work and strengthen justifications where

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			<p>considered the protection afforded by normal planning and development management policies (PPW, paragraph 4.8.11), the Welsh Government has concerns on the excessive number and scale of green wedges proposed in the Deposit plan. All green wedges will need to be robustly justified.</p> <p>How has the identification of green wedges informed the scale and location of growth, particularly in more sustainable settlements? Why is there a need for green wedges in these locations? Please see our previous comments on Tier 4 Centres.</p>	<p>necessary.</p> <p>The consideration and selection of development sites has not prohibited existing Green Wedge designations.</p>
<p>1569 Mark Newey, Welsh Government, Plans Branch</p>	<p>4A Policy 16</p>		<p>Open Space:</p> <p>The Authority updated their Open Space Assessment in 2016, which reviewed existing open space and sought to identify any deficiencies by applying the Fields in Trust 'Benchmark Standard' (CL-02-11). Whilst the Open Space Assessment (2016) has not been included in the evidence base, the Open Space Background Paper has highlighted deficiencies in most Centres across the National Park (Appendix B). National policy states that LDPs should contain policies for the provision, protection and</p>	<p>The Open Space Assessment is the Background Paper. It has now been updated to take account of the recent changes to the Fields in Trust standards (2017). An amendment is proposed to Policy 16 and the reasoned justification to respond to this comment. Reference is made to supplementary planning guidance on planning obligations where the standards will be set out. Inclusion of the standards within the policy wording will become dated as new standards may be introduced if a new Fields in Trust guidance document is produced.</p> <p>Amendment done.</p>

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			<p>enhancement of open space and set standards so that deficiencies can be identified and met through the planning process (PPW, paragraph 11.2.2). In the Deposit plan, Policy 16 should be amended accordingly with any requirement for open space being factored into viability assessment/S106 contribution assumptions.</p> <p>Clarification from Welsh Government: Open Space – Open space will normally be provided on development sites subject to the scale and location of the development. Deficiencies identified as part of your Open Space Assessment could be met through new provision as part of a S106 agreement and listed in Policy 48 so that contributions may be sought by your Authority.</p>	
<p>2669 Mr M Bell, Campaign for Protection of Rural Wales</p>	<p>4A Policy 16</p>		<p>Policy 16 Open Spaces and Green Wedges is expressed as a statement rather than as a policy. In addition there are two elements to the statement-</p> <ul style="list-style-type: none"> a) Open Space and b) Green Wedges. <p>Paras 4.101 and 4.102 refer only to Green Wedges. There is no reference to the definition of Open Space which, from the title of the</p>	<p>As stated in paragraph 4.98 of the plan Planning Policy Wales, Edition 9, November 2016 sets out clear statements of national development control policy on formal and informal open space, playing fields and green wedges and there is no need to duplicate that in the Local Development Plan. The policy in the Plan is there to accompany the identification of open space and green wedges on the Proposals Map which is a requirement of the Local Development Plan regulations. Some additional text and cross referencing has been included however to assist the reader.</p>

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			<p>Policy, is apparently different to Green Wedges.</p> <p>c) I would therefore suggest a possible re-wording for Policy 16 as “<i>Development will not be permitted where it would erode the openness of Open Spaces or Green Wedges</i>” with a note that Existing Open Space and Green Wedges are shown on the Proposals Map and that there is an explanation of <i>Open Space</i>. PCC have a Green Wedges Policy - GN36</p>	<p>Amendment done.</p>
<p>2708 Pembrokeshire County Council</p>	<p>4A Policy 17</p>		<p>Cross reference to policy 33, which offers further advice on shore based facilities, in both developed areas of the coast (as with policy 17) and undeveloped areas of the coast (not referenced in policy 17).</p>	<p>A reference can already be found in paragraph 4.106. The overall thrust of Policy 17 is to direct proposals to developed areas so leaving the cross reference in the reasoned justification seems the appropriate approach here.</p>
<p>2708 Pembrokeshire County Council</p>	<p>4A Policy 8</p>		<p>Point i) says, amongst other things, that development of the undeveloped coast is avoided. There is a cross-reference to policy 33 on renewable energy, which seems to be more flexible on this issue in relation to offshore renewable energy generators requiring an onshore connection. It is therefore suggested that i) be modified to reflect policy 33.</p>	<p>The overall thrust of Policy 17 is to direct proposals to developed areas and this is also applicable to renewable energy proposals. The reasoned justification of the Policy allows for the case to be made for an exception to that referring to renewable energy proposals and also other types of proposals. This is seen as the appropriate approach to take.</p>

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2708 Pembrokeshire County Council	4A Policy 8		Item a) refers to remoteness and tranquillity, which is found in some parts of the National Park. However, there are many National Park locations which are anything but remote and tranquil, for instance Tenby, Saundersfoot and St. Davids, and some of the coastal areas with significant car parking (Whitesands and Manorbier, for instance).	The diversity of experience of the qualities is wide and varied within the National Park. The qualities as drafted and supporting landscape character guidance are intended to portray this. Areas where management improvements are needed and issues addressed are also highlighted in the guidance but would not be listed in a Special Qualities policy.
4570 Ms K Whitehead	4A Policy 8		3) Two important aspects I welcome for my own location of Ceibwr Bay near Moylegrove are: “The priorities will be to ensure that the sense of remoteness and tranquillity is not lost and wherever possible is enhanced – see Policy 9”. And “Development of the undeveloped coast is avoided.”	Support noted.
2708 Pembrokeshire County Council	4A Policy 9		Under point b) suggest insertion of 'significant' before adverse. As currently worded, this point is too restrictive.	Agree inserting an amendment. Amendment done.
1569 Mark Newey, Welsh Government, Plans Branch	4B		Minerals Planning Policy Wales (14.3.2) clearly states that minerals development should not take place in National Parks, unless in exceptional circumstances. However, the importance of safeguarding mineral resources in	Text has been added to clarify the position. It was resolved during the Examination of Carmarthenshire County Council's Local Development Plan that the identified shortfall had been met with subsequent permissions, allocations and dormant site reserves. No further allocations were therefore required. .

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			<p>the National Park is still recognised. The National Park is combined with Pembrokeshire for the maintenance of a 10 year landbank for crushed rock reserves, of which there is a surplus of 14mt, so no further allocations are required. The requirement for a 7 year land won sand and gravel landbank is shared between Pembrokeshire, Carmarthenshire and Ceredigion, of which there is a shortfall of 2.94mt. Whilst national policy states that landbanks are not required to be maintained within National Parks, it would be beneficial if the Authority could clarify whether the shortfall of sand and gravel has already been addressed across the region? It would appear from the Minerals Background Paper (paragraph 46) that the landbank has been maintained in Ceredigion. It would be helpful if the authority could clarify this and any implications for the Park?</p>	
4322 Minerals Products Association	4B 4.113		<p>Major Development We are pleased that the document refers to the tests set out for minerals proposals in National Parks</p>	Support noted.
4322	4B 4.114 -		The document recognises that for	The guidance governing Nationally Significant

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Minerals Products Association	4.116		NSIPs, the LPA should provide a comprehensive early assessment of all the main impacts. For this to truly reflect the impact of the proposed NSIP a full and proper resource assessment should be undertaken which identifies raw materials and minerals resources required to fulfil the development and provide an indication of supply chain issues. This section should require NSIPs to provide a full and proper resource assessment which identifies raw materials and minerals resources required to deliver the development and provide an indication of supply chain issues. NSIPs may also have additional development onsequences, the effects of which should also be considered.	Infrastructure Projects is prepared by Westminster. This matter should be addressed by UK government's guidance or by the consenting authority. Issues in terms of local impacts can be raised by the local planning authority at the time of application.
2708 Pembrokeshire County Council	4B 4.114 to 4.119		More seems to be said about NSIP than DNS. However, the latter now seem to be the more common type of application, at least in a Pembrokeshire context.	Less detail is needed in the second category as there is more detail on what a Local Impact Report is in the first category.
2708 Pembrokeshire County Council	4B 4.126		Omit the last sentence – where is the evidence to back this statement up? Do those in housing need in the National Park appreciate this approach?	This evidence came from work done in preparation of the first Local Development Plan. It is dated now and can be removed. Amendment done.
1092 Bourne Leisure	4B 4.128	Amend	Supporting paragraph 4.128, criterion d to draft Policy 20 notes: "The Authority's landscape	Agree proposed amendment. Amendment done.

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(Lichfields)			<p>sensitivity and capacity study for camping and caravanning advises that there is a need to conserve existing unspoilt landscapes and seascapes and enhance existing caravan and camping sites, with very limited opportunities for expansion or new sites – see Policy 38A.”</p> <p>The Caravan, Camping and Chalet Landscape Capacity Assessment was undertaken in November 2015, and forms part of the Authority’s evidence base for the Plan Review. The study provides an assessment of the capacity of existing Landscape Character Areas (LCAs) to accommodate a range of different types of caravan, camping and chalet developments including emerging types of accommodation. The study concludes that there are limited or very limited opportunities for the expansion of sites or the provision of new sites. However, supporting paragraph 4.128 of the draft LDP only reports that the study concludes there are very limited opportunities for expansion or new sites. Bourne Leisure considers this statement does not accurately reflect the findings of the study or the draft Policy 20, criterion (f)”. Bourne Leisure therefore requests</p>	

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			that draft paragraph 4.128 is amended as follows: “The Authority’s landscape sensitivity and capacity study for camping and caravanning advises that there is a need to conserve existing unspoilt landscapes and seascapes and enhance existing caravan and camping sites, with <u>limited or very limited opportunities</u> for expansion or new sites – see Policy 38A” [proposed amendments underlined].	
2708 Pembrokeshire County Council	4B 4.128 a)		In an all-Pembrokeshire context, the latest population forecasts suggest the decline in population will only be after 2026.	Both the 2014 (latest) and 2013 population projections for Pembrokeshire Coast National Park show a decline from the base year.
2708 Pembrokeshire County Council	4B 4.128 h)		Possibly mention something about the Town Centre Masterplans being prepared (PCC leading).	It is at present unclear on the level of weight that will be assigned to the Town Centre Masterplans or what recommendations/proposals will be included. It is therefore not considered appropriate to refer to them at present.
2708 Pembrokeshire County Council	4B 4.144		In the first sentence, refer to civic amenity sites and related recycling centres, as the two are frequently combined.	Agree. Amendment done.
2708 Pembrokeshire County Council	4B 4.162		In the last sentence, please add text to ensure that provision is made for both internal and (wherever possible) external storage.	It is not considered that the wording of Policy 31 Minimising Waste, or its reasoned justification (paragraphs 4.160-4.162), would prohibit either internal or external storage, but would seek to promote the most appropriate method of storage according to the specific development proposal.
1092	4B Policy 20	Amend	Bourne Leisure fully supports the	The suggested amendment doesn’t reflect the policy

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Bourne Leisure (Lichfields)			<p>move from a no net change policy set out within the adopted Local Development Plan. However, the Company considers that the emerging policy should be drafted so as to ensure that proposals for the expansion of existing caravan and camping sites and the development of new or extended sites are considered on a case by case basis. The conclusions of the Caravan, Camping and Chalet Landscape Capacity Assessment recognised that there are opportunities for limited and very limited expansion. This will vary from site to site. The scale of development should be based on the impact of the particular development proposed, taking into account site specific considerations such as sensitivity of the location of the site, type of development proposed, mitigation measures and the overall benefits of the development, i.e. visual, environmental, social and /or economic benefits.</p> <p>Bourne Leisure therefore requests that the policy is amended so that criterion f reads as follows: “allow limited expansion of existing caravan and camping sites or the limited development of new sites,</p>	<p>approach set out in the Plan which provides a policy framework within which individual proposals will be considered. The policy approach is one where its interpretation will be supported by the capacity study which will be taken forward as supplementary planning guidance.</p>

Representor – number and name	Comment on:	Remove Include Amend	Comment	Officer Response and Recommendation
			<p>based on consideration on a site by site basis". [proposed amendments underlined].</p>	
1569 Mark Newey, Welsh Government, Plans Branch	4B Policy 20		<p>Policy 21 Minerals Safeguarding: In the Deposit Plan, the first paragraph of Policy 21 should be amended to remove reference to 'reserves' and replace with 'resources' in line with national policy. Clarification is also required on the need to demonstrate 'there is no suitable alternative' before development, which would otherwise sterilise a mineral resource if permitted?</p>	<p>Agree. 'Reserves' has been amended in Policy 21. 'There is no suitable alternative location' refers to cases where minor re-siting of buildings may bring development outside of safeguarded areas. This has been clarified with Welsh Government verbally and further clarification is provided in Supplementary Planning Guidance (to be taken forward for the replacement plan). Amendment done.</p>
2669 Mr M Bell, Campaign for Protection of Rural Wales	4B Policy 20		<p>Policy 20 Scale of Growth e) second line <i>favourably</i> (rather than 'favourable')</p>	<p>Agree amendment. Amendment done.</p>
2708 Pembrokeshire County Council	4B Policy 20		<p>On point f), should something be said about coastal roll-back, as elaborated in policy 34C? Does 34C include caravan and camping sites (it refers to community facilities, commercial and business uses)?</p>	<p>Camping and caravan sites are businesses and would be considered in the context of policy 34.</p>
1092 Bourne Leisure (Lichfields)	4B Policy 21		<p>Planning Policy Wales notes that any mineral workings should avoid any adverse environmental or amenity impact, and that any adverse effects on local communities and the environment are mitigated to</p>	<p>Agree with proposed amendment. Amendment done</p>

Representor – number and name	Comment on:	Remove Include Amend	Comment	Officer Response and Recommendation
			<p>acceptable limits (paragraph 14.1.1). Paragraph 14.1.3 states that “...where a proposal for mineral extraction would cause demonstrable harm to the environment or amenity, which cannot be overcome by planning conditions or agreements, planning permission should not be granted”. Draft Policy 21, as currently drafted, only has regard to the environmental impacts of mineral extraction, whilst national planning policy is clear that minerals extraction must also have regard to impact on amenity. It is important that the emerging LDP takes into account any adverse impact on amenity when considering mineral extraction, due to the potential harmful impact such development could have on the amenity of the surrounding area. Bourne Leisure therefore requests that the following additional wording is included within draft Policy 21: “ Extraction of minerals before development which would otherwise sterilise mineral resources of current or likely future economic importance will be required, provided there is no suitable alternative location and an overriding need for the development, and extraction can be achieved:</p>	

Representor – number and name	Comment on:	Remove Include Amend	Comment	Officer Response and Recommendation
			<p>a Without prejudicing the proposed development; and b By completing the extraction within a reasonable timescale; and c Without unacceptable environmental <u>or amenity</u> impacts.” [proposed amendments underlined]. Policy 30</p>	
2708 Pembrokeshire County Council	4B Policy 21		It might be worth saying that where prior extraction is required, it is only of shallow reserves	Agree. Reference to shallow resources has been added in paragraph 4.138. Amendment done.
1569 Mark Newey, Welsh Government, Plans Branch	4B Policy 22		<p>Policy 22 Buffer Zones: As currently worded, Policy 22 would benefit from additional clarity in the Deposit Plan. A list of active and inactive sites in the Park and the types of development that would or would not be acceptable within the buffer zone could usefully be included in the policy.</p> <p>Clarification from Welsh Government: Policy 22 Buffer Zones - Whilst national policy contains detailed policy statements on what development is or is not suitable within buffer zones (PPW 14.4.1, 14.7.16, MTAN 1 70 & 71), the intention of national policy is that LPAs should determine the size of buffer zones locally ‘depending on a</p>	Policy 22 has been amended to provide a criteria based policy. Paragraph 4.139 has been amended to provide clarity on sensitive uses and a list of sites with buffer zones, their resource type and buffer zone size. Reference to coal has been deleted. Amendments done.

Representor – number and name	Comment on:	Remove Include Amend	Comment	Officer Response and Recommendation
			<p>number of factors, such as the size, type and location of workings etc.’ (PPW 14.7.16) and have a supporting policy based on local evidence. As a policy is required on buffer zones to support their identification on the proposals map, it is suggested that the policy on buffer zones is made locally specific and expanded to provide clarity to the plan user on where buffer zones are located (by providing a list of existing mineral sites in the Park) and the reasons for the buffer zones and what development would / would not be permitted within buffer zones. A criteria based policy is adopted by the following Authorities who have recently gone through LDP examinations, which you may find helpful; Neath Port Talbot, Cardiff, Vale of Glamorgan and Powys (see MAC changes).</p> <p>Having just re-read paragraph 4.110, we would suggest you delete reference to coal – as we assume there are no buffer zones for coal in the NP?</p>	
2669 Mr M Bell, Campaign for Protection of	4B Policy 22		Policy 22 Buffer Zones. Again this policy is expressed as a statement. Perhaps Policy 22 could read as <i>Planning proposals within Buffer</i>	Policy 22 has been amended to provide a criteria based policy which follows national policy. Amendment done.

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Rural Wales			<i>Zones will be considered within national policy and guidance or an adaptation of PCC's GN25.</i>	
2708 Pembrokeshire County Council	4B Policy 23		On point i) the Methley judgement may have implications.	The Methley judgement relates to a Court of Appeal decision for the use of waste material in quarry restoration and whether this should be considered as waste 'disposal' or 'recovery'. 'Disposal' would not be permitted. The Court of Appeal determined that the key test is whether the restoration work would have been carried out if waste material was unavailable? This would be dependant on the level of restoration works and subsequent cost required, which may result in amended restoration schemes being considered. This issue is therefore case sensitive. It will however be an important consideration at Development Management stage when dealing with necessary restoration schemes.
2708 Pembrokeshire County Council	4B Policy 25		There may be a need to find temporary storage sites for recycled materials (so that the recycled materials remain available if there isn't an immediate use for them). This will also be something for PCC to address in its LDP review.	Noted. Any specific proposals for temporary storage of recycled materials will be considered under LDP Policies 25 Recycled, Secondary and Waste Materials and 27 Local Waste Management Facilities as appropriate.
1569 Mark Newey, Welsh Government, Plans Branch	4B Policy 26		Policy 26 Inactive Minerals Sites See Appendix 1 for this representation.	Further clarification has been provided in paragraph 4.146, citing two ceased quarry sites where restoration requirements apply and the type of restoration that will normally be sort on sites (nature conservation). Areas designated as Coal High Risk Areas will be shown on on the Constraints Map in accordance with the Local Development Plan Manual Edition 2 section 2.4.1. This is a spatial delineation that is not determined by the Local

Representor – number and name	Comment on:	Remove Include Amend	Comment	Officer Response and Recommendation
				<p>Development Plan and is subject to updates from The Coal Authority. The Background Paper has been updated accordingly.</p> <p>Amendment done.</p>
<p>1569 Mark Newey, Welsh Government, Plans Branch</p>	<p>4B Policy 27</p>		<p>Waste</p> <p>The LDP strategy to provide local scale waste facilities that would predominately serve the National Park is considered appropriate in-line with national policy. Policy 27 Local Waste Management Facilities provides a framework against which such applications will be assessed.</p> <p>The Deposit plan should:</p> <ul style="list-style-type: none"> • Identify any established employment sites and assess their suitability to meet waste requirements (TAN 21, paragraph 3.21); • Include a requirement in Policy 27 for the submission of a Waste Planning Assessment to be submitted with applications for a waste management facility classified as a disposal, recovery or recycling facility (TAN 21, paragraph 4.2). 	<p>No employment sites are currently proposed in the revised Local Development Plan. Should any sites be identified, they will be assessed for their suitability.</p> <p>Text requiring a Waste Planning Assessment has been inserted into Policy 27 Local Waste Management Facilities.</p> <p>Amendment done.</p>

Representor – number and name	Comment on:	Remove Include Amend	Comment	Officer Response and Recommendation
1569 Mark Newey, Welsh Government, Plans Branch	4C		Coastal Management: National Planning Policy (PPW, paragraph 5.6.3) states that authorities “should clearly establish what the coast means for them and develop, or apply, specific policies which reflect the characteristics of their coastline”. We note the proposals map will identify Coastal Change Management Areas considered unsuitable for development. This is supported by Policy 34A and the two shoreline management plans for Pembrokeshire. The Deposit plan should ensure allocated sites are appropriate in-line with local and national policy, which recognises the undeveloped coast will rarely be the most appropriate location for development (PPW, paragraph 5.7.2).	Comment is noted. Policies 34A, 34B and 34C relate to areas of coastal change. All these 3 policies make reference to the need for proposals to comply with other policies of the Local Development Plan. Policy 8 of the Plan makes reference to the need to avoid development of the undeveloped coast, in line with National Planning Policy (paragraph 5.7.2). All site allocations will recognise this.
2616 Pembrokeshire Friends of the Earth	4C Policy 33	Amend	See Appendix 1 for this representation.	See Appendix 1 for a response to this representation.
2708 Pembrokeshire County Council	4C		Flooding: Less sensitive development may be able to take place in flood risk areas, if suitable mitigation is provided. However, PCC agrees that where the effect	This is in the objectives section of the Plan and gives an overview of the key outcomes. The intricacies of the policy approach are detailed in the relevant policies of the Plan. Recommend: To add clarity the word ‘vulnerable’ could be added before the word ‘development’.

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			would be an increase in downstream flood risk, the development should not take place.	Amendment done.
1670 Natural Resources Wales	4C 4.163		Page 80 paragraph 4.163. The sentence which reads “Sustainable drainage systems are promoted by NRW and supported by Dwr Cymru should be written the other way around – Sustainable drainage systems are promoted by Dwr Cymru and supported by NRW.	Noted. Recommend amendment is made to correct this error. Amendment done
4545 D Thomas Pembrokeshire County Council	4C Flooding		no mention or policy regarding the tarmacking of gardens to allow for off road parking which can result in drainage issues	Surfacing of gardens for parking is below a certain size is permitted development. Larger areas requiring planning permission will be considered against the relevant policies of the Plan and national planning policy which takes flooding and surface water drainage fully into account.
1092 Bourne Leisure (Lichfields)	4C Policy 30		Bourne Leisure has no objection to this policy, in principle. However, the Company considers that it is important that the new policy takes account of the fact that, in some cases, development that might affect amenity may be acceptable, subject to the provision of appropriate mitigation measures and consequently, such development would not result in any overall harmful impacts upon amenity. It is, therefore essential that the new policy includes the flexibility to allow for the mitigation of adverse impacts in relation to amenity. This would	The Plan has been reviewed to ensure that there is a consistency of approach where policies refer to assessing impacts. Terms have also been explained in the Glossary of Terms. Amendment done.

Representor – number and name	Comment on:	Remove Include Amend	Comment	Officer Response and Recommendation
			<p>help ensure that suitable and sustainable development proposals would not be prevented from coming forward where they include appropriate and achievable mitigation measures.</p> <p>Bourne Leisure therefore suggests the following additional wording should be added to draft Policy 30: “Development proposals that could result in adverse impacts on amenity will be considered according to their merits on a case-by-case basis, and subject to appropriate mitigation measures which address any negative impacts”</p>	
<p>1663 Dwr Cymru Welsh Water</p>	<p>4C Policy 32</p>		<p>Policy 32 – Surface Water Drainage (and supporting text)</p> <p>We welcome the inclusion of this policy as it ensures that surface water flows from new development will not communicate with the public sewerage network. We are also pleased to note under the supporting text 4.168 that there is a requirement on developers to meet the costs of adoption and provide long-term management of sustainable drainage systems.</p>	<p>Support noted.</p>
<p>1092 Bourne Leisure</p>	<p>4C Policy 33</p>		<p>It is Bourne Leisure’s view that holiday accommodation, and caravans in particular, should be</p>	<p>The impact of renewable energy developments on neighbouring amenity with regard to noise, shadow flicker, glare, visual prominence (overbearing) etc. form normal</p>

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(Lichfields)			<p>recognised as particularly sensitive to any noise and vibration impacts of renewable energy schemes, given the lower level of noise insulation that these structures provide. The visual impact of renewable energy schemes and the glint and glare from solar schemes should also be appropriately considered in relation to sensitive locations, including tourism facilities and holiday destinations.</p> <p>Given the importance of tourism to the local, regional and national economy, Bourne Leisure considers that the new Local Development Plan should reinforce protection for tourist accommodation from potential adverse impacts of renewable energy development. Otherwise, there is a risk that tourists may be deterred by these issues from visiting or returning to the area, thereby impacting on the local economy.</p> <p>Bourne Leisure considers that the wording of draft Policy 33 should be amended so that small scale and medium scale schemes are considered favourably, subject to there being no adverse impact on the environment or amenity, rather than “no over-riding environmental</p>	<p>planning considerations that are taken into account on a case by case basis. Difficulties exist in assessing the specific impact of a renewable energy development on tourism (without the availability of site specific evidence), however it is agreed that this represents an important sector of the local economy. The Plan has been reviewed to ensure that there is a consistency of approach where policies refer to assessing impacts. Terms have also been explained in the Glossary of Terms.</p> <p>Additional advice has also been inserted in the reasoned justification. Amendment done.</p>

Representor – number and name	Comment on:	Remove Include Amend	Comment	Officer Response and Recommendation
			<p>and amenity considerations” [our emphasis]. It is considered that the revised wording provides a clearer test for the developer and for the local community when considering whether such developments should be permitted.</p> <p>Bourne Leisure therefore suggest that the policy should be amended as follows: “Small scale renewable energy schemes will be considered favourably, subject to there being no <u>ever-riding adverse impact upon the environmental and amenity considerations</u>. Medium scale schemes also offer some potential and will be permitted subject to the same considerations. Large scale renewable energy schemes will only be permitted where they do not compromise the special qualities of the National Park.” [proposed amendments underlined]</p>	
1569 Mark Newey, Welsh Government, Plans Branch	4C Policy 33		See Appendix 1 for this representation.	No Candidate Site submissions were received for renewable energy generation and large scale allocations are not considered to be appropriate within the National Park landscape. The Housing Site Assessment – Options for low and zero carbon technologies paper, dated September 2009, has previously assessed the largest sites for potential and no opportunities were available. No new sites have come forward during the review process.

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				<p>The reasoned justification in the draft Deposit Local Development Plan has been updated to refer to the Renewable Energy Assessment and its relationship with nationally defined scales for renewable energy. It explains why the Authority considers it appropriate to use locally defined scales within the Renewable Energy policy (see paragraphs 4.100-4.105 and Policy 34 in the draft Deposit Local Development Plan). It is also considered that including two different definitions of scale in the same policy could potentially confuse and undermine the policy approach taken.</p> <p>Reference to specific technologies and their impacts has been added to the reasoned justification (see paragraph 4.108 in the draft Deposit Local Development Plan).</p> <p>The targets identified in the Renewable Energy Assessment have been included as monitoring indicators (see Indicators 12 and 13 in the Deposit Local Development Plan). These note the aspirational nature of the targets due to a number of influencing variables that lie beyond the scope of the replacement plan.</p> <p>Reference to 'have regard to alternative sites' has been removed from the text as it is not considered appropriate.</p> <p>Amendment done in part.</p>
1663 Dwr Cymru Welsh Water	4C Policy 33		Policy 33 - Renewable Energy Whilst we are generally supportive of this policy, we would request that any of our infrastructure affected by a renewable energy proposal is protected accordingly.	Dwr Cymru/Welsh Water is routinely consulted on planning applications and will have the opportunity to identify where infrastructure requires protections from development.

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2669 Mr M Bell, Campaign for Protection of Rural Wales	4C Policy 33		Policy 33. I would suggest that concerns should replace <i>considerations</i> in lines 4, 6 and 15 of the Policy as <i>considerations</i> are factors which need to be taken into account; <i>concerns</i> on the other hand are not neutral but are expressions of real or perceived worry.	As a result of concerns raised during the consultation the Plan has been reviewed to ensure that there is a consistency of approach where policies refer to assessing impacts. Terms have also been explained in the Glossary of Terms. Amendment done.
3468 Ms Mary Sinclair, Campaign for Protection of Rural Wales	4C Policy 33		See Appendix 1 for this representation.	See Appendix 1 for this response.
1092 Bourne Leisure (Lichfields)	4C Policy 34		Bourne Leisure understands the importance of tackling the consequences of climate change in future development. As many of Bourne Leisure’s sites are located in coastal areas, the Company has significant experience of operating within and adjacent to areas that are at risk from flooding and takes the need for measures to reduce the risk of flooding fully into account when preparing development proposals for sites. Bourne Leisure recently secured planning permission for development proposals at Kiln Park, which is partly located within Pembrokeshire	The national policy context supported by the policies set out in the Preferred Strategy allow for consideration of such cases.

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			<p>Coast National Park. Natural Resources Wales confirmed within its response to the planning application that the development was seen as a “betterment”, as the flood risk was being reduced whereby caravans were moved to higher ground and through an overall reduction in the number of caravans within the flood risk area. The development was therefore considered to be acceptable in relation to flooding. Accordingly, Bourne Leisure considers that it is important for the emerging policy to endorse proposals that provide improvements to the existing flooding position. Bourne Leisure therefore requests that the following additional wording is added to draft Policy 34: <u>“Development proposals that result in improvements to the existing flooding position will be considered according to their merits on a case-by-case basis.”</u></p>	
1670 Natural Resources Wales	4C Policy 34		Page 85 policy 34 – Please be aware that Welsh Government are looking into producing one flood map for Wales, therefore this policy could be subject to change.	Noted.
2669 Mr M Bell,	4C Policy 34		Policy 34c element c). It is	This policy deals with the issue of property becoming

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Campaign for Protection of Rural Wales			suggested that the use of <i>comparable in size</i> is too limiting particularly as it affects community facilities as there may be opportunities to improve the facility should enforced re-location be required. Opportunities for improvements to commercial organisations may also need to be considered if there are distinct benefits to be obtained. I am suggesting that a more flexible wording for this element c) of policy 34C is required once re-location has been justified <u>because</u> of Coastal Change.	unusable or unsafe due to inundation from the sea or coastal erosion and offers an exceptional release of land for the replacement of lost facilities which help to sustain communities. Other policies in the Plan allow for proposals coming forward for employment, business and community uses and for proposals substantially different to those being lost, consideration against these other proposals would be relevant.
1092 Bourne Leisure (Lichfields)	4C Policy 34A		Policy 34A – Development in the Coastal Change Management Area Bourne Leisure supports draft Policy 34A which allows for proposals for all other new development (non-residential) or the intensification of existing development or land uses in the Coastal Change Management Areas, provided that it can be demonstrated that it will result in no increased risk to life or significant increase in risk to property, in addition to complying with all other relevant policies of the LDP. The Company considers it to be important to allow development	The policy allows for less vulnerable developments within such areas. Support is noted.

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			within the Coastal Change Management Area, given the tourism industry's strong connection to the coastline and the potential to increase tourism related expenditure within the local economy.	
2708 Pembrokeshire County Council	4C Policy 34A		PCC may wish to comment further once the extent of the Coastal Change Management Area(s) is published.	Comment noted.
1670 Natural Resources Wales	4C Policy 34B		Page 88 policy 34B (a) Why 20 years?	Twenty years is the timescale that Government guidance states (for the purposes of Shoreline Management Plans) as the 'present time' or 'short-term'. It is used in all Shoreline Management Plans to define Epoch 1. There is a need to balance blight with the ability of property owners within the risk areas to adapt or respond to the coastal changes. This information can be inserted into the supporting text of the relevant policies to clarify the position. The policy does not preclude proposals coming forward outside of the timeframe from being considered but it does provide special circumstances for those with property of very low or no value to relocate. Amendment done.
2708 Pembrokeshire County Council	4C Policy 34B		In point a), who decides which dwellings are likely to be affected or threatened by erosion or tidal inundation within 20 years?	The Deposit Plan will show risk areas on the Proposals Map which will be based on flood risk areas and Shoreline Management Plan policy. Management strategies will be required to support the relocation of homes, businesses and other assets and it will become clearer over time which properties are at risk in the shorter-term.
1092 Bourne Leisure (Lichfields)	4C Policy 34C	Remove	Question 1: Preferred Strategy Comments a) Is there anything that you feel we have included that should be	This is a new policy approach and the criterion was included to clarify that it does not over-ride other normal policy considerations. The phraseology can be amended to better reflect this.

Representor – number and name	Comment on:	Remove Include Amend	Comment	Officer Response and Recommendation
			<p>removed? Yes.</p> <p>Policy 34C – Relocation and replacement of development (other than residential) affected by coastal change.</p> <p>Draft Policy 34C states that “proposals for the relocation and replacement of community facilities, commercial and business uses that are considered important to coastal communities and are affected by coastal change will be permitted” provided that they meet a list of criteria. Criterion d states: “The proposal complies with all other relevant policies of the Local Development Plan”</p> <p>Section 38 (6) of the Planning and Compulsory Purchase Act (2004) requires all planning applications to be determined in accordance with the adopted plan unless material considerations indicate otherwise. This is further re-iterated at paragraph 2.1.2 of the Planning Policy Wales. It is not considered necessary to include the above criterion within draft Policy 34C, as it unnecessarily duplicates national planning policy.</p> <p>Furthermore, criterion d requires</p>	<p>Amendment done.</p>

Representor – number and name	Comment on:	Remove Include Amend	Comment	Officer Response and Recommendation
			proposals to comply with all other relevant policies of the Local Development Plan. This requirement conflicts with Section 38 (6) of the Planning and Compulsory Purchase Act (2004), which recognises that proposals need not always comply with the adopted plan if material considerations indicate otherwise. Bourne Leisure therefore recommends that criterion d of draft Policy 34C is removed.	
1631 Bluestone Resorts Ltd (G Davies)	4C Policy 35 Visitor Economy		See Appendix 1 for this representation	See Appendix 1 for the response to this representation.
1569 Mark Newey, Welsh Government, Plans Branch	4D		<p>Employment</p> <p>Employment in the National Park is strongly based on the tourism industry, with the largest employment sectors falling outside the traditional B-use classes (Employment Background Paper). The Authority has highlighted in the Preferred Strategy (paragraph 4.2.2) that employment allocations in the adopted plan have not been developed due to viability concerns and a lack of developer interest, with most enquiries directed to the County Council at Milford Haven,</p>	<p>Comments and support for the approach is noted.</p> <p>The National Park does not have large derelict brownfield sites to list as employment protection sites. The Plan does contain a policy which protects employment sites and buildings generally for that use as the nature of sites in the National Park is generally small-scale and scattered.</p> <p>Recommend that reference to the small and scattered nature of employment sites is included in paragraph 4.235 which provides justification for not listing or identifying them individually.</p>

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			<p>Pembroke Dock and Haverfordwest. To avoid frustrating land for alternative uses and accommodating specialist market requirements, the Welsh Government supports the Authority adopting a more flexible approach through criteria-based policies to promote small scale employment opportunities in Centres and the countryside.</p> <p>As worded, the employment policies are in broad alignment with national policy. In the Deposit plan, the Authority should:</p> <ul style="list-style-type: none"> • Include criteria based policies to assess applications for employment opportunities in both urban and rural areas; • Include a criteria based policy to promote and assess the expansion of established businesses in rural areas, and • Consider a safeguarding policy that identifies and lists any established employment sites for retention for employment purposes. 	
1569 Mark	4D		Tourism	There are no known proposals for visitor accommodation requiring a specific allocation in the Plan. The policy

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<p>Newey, Welsh Government, Plans Branch</p>			<p>The visitor strategy for the National Park is to attract an optimal number of tourists all year round whilst ensuring the environment of the Park continues to hold its attraction. The Authority intends to achieve this by not adding substantively to the overall provision of visitor accommodation (LDP, paragraph 4.187) yet conversely identifies demand for new hotels, guest houses, chalet, caravan and camping sites? (LDP, paragraphs 4.195/4.204). The Authority should clarify their approach to the visitor economy and clearly evidence demand over the plan period.</p> <p>A capacity assessment of existing Landscape Character Areas (LCA) to accommodate future growth for chalet, caravan and camping sites has identified limited opportunities in some and the need to retain restraint in others (LDP, paragraph 4.205). To locate development in the most sustainable places, the Authority may wish to identify LCA with growth opportunities in Policy 38A, where appropriate. Moreover, the Plan could usefully include a separate criterion based policy to support new</p>	<p>approach allows for consideration of proposals coming forward in the context of protecting the National Park landscape.</p> <p>It is intended to publish Supplementary Planning Guidance based on the Caravan, Camping and Chalet Assessment (November 2015) which will provide greater detail on the areas where new or additional camping and caravanning may be appropriate. Development opportunities will be small scale and the level of detail required to identify such opportunities is overly detailed to include in the Plan. Prior to the adoption of the Supplementary Planning Guidance the Report is available for potential applicants to see.</p> <p>Policy 35 includes a criterion directing new hotels to Centres or allows conversion of appropriate buildings in the countryside to this use. Other generic policies in the Plan will be used to consider the suitability of sites. The number of new hotels coming forward in the Park is very small. It is proposed to continue using the existing approach which has worked well to date.</p>

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			build development and conversion opportunities for hotels and guest houses (LDP, paragraph 4.195).	
2708 Pembrokeshire County Council	4D 4.187		The desire of the NPA not to add substantively to the overall provision of visitor accommodation in the National Park seems overly negative. An approach that supported visitor accommodation proposals which did not cause significant harm to NP landscapes might be better.	The text provides a more nuanced approach to visitor accommodation rather than a support in principle for everything subject to national park purposes and the text of the introduction seeks to expand on this and provide guidance as to the rationale for the policies that follow.
1092 Bourne Leisure (Lichfields)	4D 4.188		See Appendix 1	See Appendix 1 for this response.
1092 Bourne Leisure (Lichfields)	4D 4.206		Bourne Leisure endorses supporting paragraph 4.206 to draft Policy 38A which recognises the changing patterns of use from touring units to static units and the introduction of new types of leisure accommodation including ‘glamping’. It also recognises that the nature of the industry is likely to continue to change. The Company has certainly experienced this shift and recognises that there is a continuing need for investment and upgrading works at its Parks, as a result of meeting the changing demands of the market.	Noted.

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1092 Bourne Leisure (Lichfields)	4D 4.208		Caravan and Camping Landscape Assessment. Supporting paragraph 4.208 notes that the Caravan, Camping and Chalet Landscape Capacity Assessment will be taken forward as Supplementary Planning Guidance. Bourne Leisure requests that any such SPG is subject to early stakeholder engagement and public consultation, in particular so that the Company has the opportunity to comment.	Supplementary Planning Guidance is subjected to public consultation. The standards for consultation are set out in the Authority's Delivery Agreement.
2708 Pembrokeshire County Council	4D 4.220		The large employers in the energy and service sectors and the many small and medium-sized enterprises are both of key importance to the future prosperity of Pembrokeshire.	Noted.
2708 Pembrokeshire County Council	4D Footnote 167		This refers to paragraph 4.44, but perhaps should say 4.57?	Agree amendment as suggested. Amendment done.
1092 Bourne Leisure (Lichfields)	4D Policy 35		Bourne Leisure has no objection to draft Policy 35, in principle. However, Bourne Leisure raises concerns with regard to criterion a as currently drafted with regards to the term 'limited'. Bourne Leisure considers that the emerging policy should be drafted so as to ensure that proposals for caravan, camping and chalet development are considered on a case by case basis. The Company considers that the	The approach is based on a study to assess the capacity of the landscape of the National Park to accommodate additional camping and caravanning development. The word 'limited' is included in the policy to give a clear message on the level of additional development that is likely to be supported. Deletion of the word 'limited' as suggested would not change the policy approach but would not provide the same clarity of the approach.

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			<p>scale of development should be based on the impact of the particular development proposed, taking into account site specific considerations such as any sensitivity of the location of the site, type of development proposed, mitigation measures and the benefits of the development.</p> <p>Bourne Leisure therefore requests that the policy is amended to read as follows: “ allowing <u>limited</u> caravan, camping and chalet development” [proposed amendments underlined].</p>	
2669 Mr M Bell, Campaign for Protection of Rural Wales	4D Policy 35		<p>Policy 35e) I suggest that element e) “...<i>in or adjacent to Centres</i>” be replaced by in or adjoining Centres. It is also noted that the County Council uses the term “<i>well related to</i>” rather than adjacent and <i>well related to</i> is defined. <i>Adjacent</i> and <i>well related to</i> introduce a degree of flexible interpretation that is not open to <i>adjoin</i>. The protection of Special Qualities of the NPA are best served by the use of <i>adjoining</i>.</p>	<p>The wording of the policy replicates that used in Planning Policy Wales for employment and business sites in rural areas. The policy also allows for consideration of proposals which do not meet the ‘within or adjacent to’ criterion.</p>
2669 Mr M Bell, Campaign for Protection of Rural Wales	4D Policy 37		<p>Policy 37 Self-Catering Development Para 4.199 defines self-catering as including <i>chalets</i> and with the statement in the Policy that <i>New build self-catering development on greenfield sites will not be</i></p>	<p>This is a typographical error.</p> <p>Recommend that the word ‘chalets’ is deleted from paragraph 4.199.</p> <p>Amendment done.</p>

Representor – number and name	Comment on:	Remove Include Amend	Comment	Officer Response and Recommendation
			<i>permitted.</i> However Policy 38A includes Chalet Development in the title and with reference in the policy to being able to progress chalet development away from the coast etc ... a far more liberal interpretation than under Policy 37. This ambiguity needs clarification – in favour of Policy 37 para 4.199 which again best serves Special Qualities of the NPA.	
2708 Pembrokeshire County Council	4D Policy 37		Conversion of existing buildings to self-catering accommodation is permitted, but only where shown to be inappropriate for market or affordable housing. The reason for prioritising housing is understood. However, if the owner of the building doesn't want to progress a residential conversion and isn't permitted to undertake a self-catering conversion, the property may fall into dereliction and ultimately be lost, which would be a poor outcome.	Agree this would be a poor outcome but this has not arisen to date. The policy has been implemented since 2010. Properties with full-residential use can be used for self-catering.
1092 Bourne Leisure (Lichfields)	4D Policy 38A		See Appendix 1	See Appendix 1 for this response
2669 Mr M Bell, Campaign for Protection of	4D Policy 38A		Policy 38A) In order to improve the clarity the first sentence should read " <i>New Caravan Camping and Chalet</i>	Agree that additional wording would add clarity. Recommend that the 1 st paragraph of Policy 38A is amended to read:

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Rural Wales			<p><i>sites and changes in the type of accommodation within existing sites will be considered away from the coast and Preselis and in locations not intervisible with them</i></p> <p>This addition would clarify the meaning of “changes”</p> <p>It will be essential to include a map as part of any SPG indicating those areas within which sites meet the criteria of the Policy.</p> <p>It would appear that this policy has been suggested to possibly permit a range of small sites which would otherwise (and perhaps recently) have been refused consent.</p>	<p>“...and changes of accommodation within existing sites....”</p> <p>Amendment done.</p> <p>The proposed Supplementary Planning guidance will be based on the Camping and Chalet Capacity Assessment (as advised in paragraph 4.207 of the Preferred Strategy). A map detailing all areas which may meet with the policy would and not possible. The approach being taken is one of providing advice in the manner in which the Authority has provided in the Renewable Energy Supplementary Planning Guidance. .</p>
2708 Pembrokeshire County Council	4D Policy 38A		<p>In the first paragraph, how is the term ‘away from’ going to be defined? Consider clarifying this in the reasoned justification.</p> <p>PCC may wish to comment further on this later in the Plan process, when the spatial information on where the policy does / doesn’t apply are to hand.</p>	<p>There is reference to definition of terms in paragraph 4.208 of the Preferred Strategy. The reference can be clarified further.</p> <p>Mapping is provided in the Background Paper prepared to support this Policy.</p> <p>Amendment done.</p>
1092 Bourne Leisure (Lichfields)	4D Policy 40	Include	Supporting paragraph 4.218 goes on to say that “a balance must therefore be achieved between the need to maintain or improve the quality of facilities on site (having regard to site licensing requirement), and the	The decision on whether to improve on-site facilities is a matter for the site owner. The policy sets out the way the planning authority will consider applications. The additional wording referred to here provides further explanation of the consideration of the overall outcome but should not form part of the policy.

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			<p>need to safeguard existing facilities of nearby Centres”.</p> <p>One of the Bourne Leisure’s overriding aims is to continually improve the quality of its visitor accommodation and facilities. In particular, the Company seeks to respond to changes in the tourism market and ensure its facilities are of high quality, in order to be able to continue to attract visitors and generate employment and local spending.</p> <p>It is vital therefore, as recognised within draft paragraph 4.218, that a balance is achieved between the need to maintain or improve the quality of facilities on site and the need to safeguard existing facilities of nearby centres.</p> <p>Bourne Leisure therefore requests that the following wording within supporting paragraph 4.218 is added to draft Policy 40:</p> <p><u>“Development proposals will be considered according to their compliance with the above criteria, and subject to recognising that a balance must be achieved between the need to maintain or improve the quality of facilities on-site (having regard to site licensing requirement), and the need to safeguard existing</u></p>	

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<p>1092 Bourne Leisure (Lichfields)</p>	<p>4D Policy 41 (from the current Local Development Plan)</p>	<p>Include</p>	<p>facilities of nearby Centres”.</p> <p>b) Is there anything that you feel we have not included that we should consider? Yes. Policy 41 – Change of Use from Tent Pitches to Touring Caravan Pitches The Preferred Strategy document proposes to delete existing Policy 41 within the adopted LDP (Change of Use from Tent Pitches to Touring Caravan Pitches). Bourne Leisure understands that the Preferred Strategy document seeks to combine policies from the adopted LDP relating to camping, touring caravan, statics and chalet sites into one new, comprehensive policy – draft Policy 38A. Indeed, elsewhere in these representations Bourne Leisure generally supports the positive changes set out in the draft policy. However, the Company considers that the broad nature of draft Policy 38A does not make it explicitly clear that the change of use from tent pitches to touring caravan pitches will be supported, in some circumstances. It is also not clear as to why this policy is proposed to be deleted. The Company therefore considers that the new policy/policies in</p>	<p>Policy 38A allows for changes within existing sites and sets out the context in which they would be considered acceptable. This would include a change of use from tent pitches to touring pitches.</p>

Representor – number and name	Comment on:	Remove Include Amend	Comment	Officer Response and Recommendation
			relation to caravan, camping and chalet development should make it explicitly clear that proposals for the change of use from tent pitches to touring caravan pitches will be supported, subject to no adverse impact on the environment, to ensure that the new policy/policies allow sufficient flexibility to respond to changing marketing demands. Bourne Leisure therefore requests that Policy 41 within the adopted LDP is retained or is incorporated as part of draft Policy 38A.	
1663 Dwr Cymru Welsh Water	4D Policy 42		Policy 42 – Employment Sites & Live/Work Units Should any employment sites and live/work units propose to connect to our infrastructure, then we may need to undertake an assessment to determine if there is enough capacity available. Should the proposal wish to discharge trade effluent, then the consent of Welsh Water will be required and there may also be an element of pre-treatment necessary.	Noted. The Authority will liaise with Dwr Cymru on allocations and relevant applications.
2708 Pembrokeshire County Council	4D Policy 43		The one year marketing requirement in criterion c) seems too long.	The requirement to market sites for at least a year is included in the current Local Development Plan, but has been moved into the Policy in the Preferred Strategy for clarity. The reason for the timescale is that the marketing of businesses is more specialised and therefore more

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1569 Mark Newey, Welsh Government, Plans Branch	4E		<p>Growth Options and Housing Provision</p> <p>See Appendix 1 for this representation</p>	<p>restricted market than the general housing market.</p> <p>Amendments have been done to the Plan and supporting information which should address these concerns.</p> <p>Amendments done.</p>
1569 Mark Newey, Welsh Government, Plans Branch	4E		<p>Housing Components</p> <p>Flexibility / Discount Allowance: Policy 44 Housing proposes a provision of 1100 units, which includes a 10% flexibility allowance to account for the non-delivery of sites. This has been balanced against the landscape sensitivities of allocating additional land in the National Park (Housing Background Paper, 2017). However, the flexibility element is unclear in Policy 44, as reference is made to an additional ‘contingency to be added’ to the provision? Whilst we support the inclusion of a flexibility allowance, it is for the Authority to evidence the level of flexibility in the plan. Similarly, the non-delivery allowance of 40% in Tenby and 25% to landbank totals will need to be robustly justified, including any impact on the strategy and/or spatial distribution.</p>	<p>Agree. This will be addressed in the Deposit Local Development Plan</p> <p>Amendment done.</p> <p>Regarding the non-delivery allowance issue additional text has been added to the Plan.</p> <p>Amendment done.</p>
1569 Mark	4E		Affordable Housing Targets:	Officers agree with the advice provided by Welsh

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<p>Newey, Welsh Government, Plans Branch</p>			<p>A broad-level viability assessment submitted as part of the evidence base has informed the affordable housing targets in Table 8 of the Preferred Strategy. The Authority has assessed Candidate Sites for potential allocation in the Deposit plan by applying a minimum threshold of 5 or more units (in Tenby) that can deliver at least 2 affordable homes on-site (LDP, paragraph 4.292). The Authority should clarify if Candidate Sites have been assessed and selected against untested affordable housing targets in the Viability Assessment? If this is the case, the Welsh Government would have significant concerns regarding the site selection process, particularly if affordable housing targets were to shift based on potential updates evidence in the Deposit plan. Would this mean that different sites could have been chosen or excluded from the outset? For example, if the affordable housing target was to increase to 25% in the South West Coast then candidate sites of 8 units could deliver 2 affordable homes instead of 10 units (at 20% target). Conversely, if targets dropped to 15% in the South West, would 7 unit</p>	<p>Government. The threshold of at least 2 affordable houses will be deleted from the Plan.</p> <p>Amendment done.</p>

Representor – number and name	Comment on:	Remove Include Amend	Comment	Officer Response and Recommendation
			<p>sites that could deliver 1 affordable unit be excluded from allocation in the plan? This is particularly relevant in the South West as unlike other housing market areas there is no 'headroom' above benchmark land value (Affordable Housing Study, Table 5.1). The Authority will need to explain and robustly justify its approach to candidate site selection. The Authority needs to make certain that housing allocations in the Deposit LDP have been assessed against general sustainability and viability criteria in the first instance in order that suitable sites are not disregarded or included unfairly from the outset.</p>	
<p>1569 Mark Newey, Welsh Government, Plans Branch</p>	<p>4E</p>		<p>Affordable Housing Threshold: Planning Authorities should include site thresholds for residential development above which a proportion of affordable housing will be sought (PPW, paragraph 9.2.17). The threshold will apply to both allocated and windfall sites in the plan, below which commuted sums may be sought. As worded, Policy 45 does not include a threshold other than a site specific target for 2 affordable units, it should do. The Deposit plan should clarify the site</p>	<p>Agree amendment required. Amendment done.</p>

Representor – number and name	Comment on:	Remove Include Amend	Comment	Officer Response and Recommendation
			threshold and its implication for affordable housing delivery on sites across the plan area.	
1569 Mark Newey, Welsh Government, Plans Branch	4E		<p>Prioritisation of Affordable Housing: Policy 37 and 43 in the Preferred Strategy seek to prioritise the provision of affordable housing over new self-catering accommodation and alternative uses on redundant employment sites in Centres and countryside locations. The purpose of the policies is unclear given that the principle of residential development is generally acceptable in settlement boundaries. How would this policy be implemented in practice? On this basis, would any sites be considered suitable for self-catering accommodation inside settlement boundaries? How does this align with the Authority's tourism strategy?</p>	<p>This policy approach has been in operation under the current Local Development Plan. It prioritises the delivery of affordable housing in residential developments. The Authority would refuse permission for self catering (which would be subject to a holiday let occupancy condition) where affordable housing could be accommodated or a financial contribution sought. In some instances affordable housing provision would not be suitable, for example in a range of buildings which were already predominantly converted to holiday let. The approach is consistent with the strategy to deliver affordable housing.</p>
1569 Mark Newey, Welsh Government, Plans Branch	4E		<p>Gypsy and Travellers</p> <p>The Housing Background Paper highlights that in accordance with the provisions of the Housing (Wales) Act 2014, a Gypsy Traveller Accommodation Assessment (GTAA) has been undertaken for the</p>	<p>Officers here have been awaiting PCC's uploading the final version of the Gypsy Traveller Assessment. The Authority can ensure the document is uploaded for the Deposit Plan. There is no need to allocate in the National Park. Policy 46 Gypsy and Traveller sites has been amended to make this clear. Amendment done.</p>

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			<p>whole of Pembrokeshire including the National Park, yet no GTAA has been included in the evidence base to inform any identified or future need over the plan period.</p> <p>The aforementioned paper notes the GTAA projects an unmet need across the whole of Pembrokeshire for 32 pitches, plus 2 Travelling Showpeople’s yards over the first 5-years of the plan period (2015-2020). This would result in a total need for 101 pitches across Pembrokeshire up to 2031. The need is grouped into three geographical areas; Haverfordwest, Pembroke/Pembroke Dock and Kilgetty, which reflects the location of the two larger sites in the County Council. Whilst we note these areas lie predominately outside the National Park, the Authority should clarify if there is an element of unmet need for Gypsy and Traveller accommodation in the Park? The duty to meet any assessed need is outlined in Section 103 of the Housing (Wales) Act 2014. National policy also states that “where there is an assessment of unmet need....local planning authorities should allocate sufficient sites to ensure the identified pitch</p>	

Representor – number and name	Comment on:	Remove Include Amend	Comment	Officer Response and Recommendation
			requirements can be met” (Circular 30/2007). The Authority should ensure any unmet need is identified through the provision of appropriate sites in the Deposit plan.	
1569 Mark Newey, Welsh Government, Plans Branch	4E		<p>Policy 46 Gypsy and Traveller Sites: The Welsh Government supports the inclusion of criteria based Policy 46 to assess any proposals for new Gypsy and Traveller sites. However, Criterion A does not accord with Welsh Government Circular 30/2007 and should be considered for deletion in the Deposit Plan. Annex B in the Circular notes that policy requirements to demonstrate ‘evidence of need’ would act against freedom of movement for Gypsies and Travellers who may wish to develop their own sites. Such restrictions would not be placed on non-Gypsies and Travellers.</p> <p>Further clarification from WG: Policy 46 Gypsy and Travellers – As worded, Criterion A could be considered not to promote the same rights in the planning system as other citizens (Bullet 1, Annex B). The requirement to ‘evidence need’</p>	<p>The justification for deleting criterion a) in the email clarification above actually refers to the Welsh Assembly Government not approving of a criterion that advises 'Applications from Gypsies and Travellers with no local connection will not normally be allowed.' The supporting text quite rightly refers to the fact that Gypsies and Travellers are nomadic and do not necessarily have local connections. Given this context it is still argued by this Authority that the criterion is appropriate as it does not apply this restriction. The purpose of the criterion is to ensure that proposals for Gypsies and Travellers are planned for in a co-ordinated fashion and if there is a suitable plot already available in the area then it would be better to utilise this than create a new site on an ad hoc basis where there was no justification for it. This would not prevent Gypsies and Travellers providing a justification for why they needed to be in that particular location, for example the need to have a transitory site for potato picking on the St David's peninsula.</p> <p>These types of proposals come forward in a countryside location which in planning terms requires justification of need. Housing in countryside locations similarly requires evidence of need.</p>

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			<p>would not be a restriction placed on non-Gypsy and Travellers, so would this requirement be fair and reasonable in the plan? By their very nature, Gypsy and Travellers are nomadic and will not always have local connections. On this basis, Authorities should determine all applications from anyone who submits them (Bullet 6, Annex B).</p> <p>Further clarification from WG: The requirement to ‘evidence need’ for new gypsy and traveller sites is an issue being considered as part of the updated circular. To my understanding, this is due to be published in the New Year.</p> <p>Whilst the findings of the updated circular should be incorporated in your Deposit plan, this may not be feasible due to the timing of its release. In this case, the LDP process and examination itself will allow for any amendments to be made.</p>	<p>Welsh Government’s New Circular is awaited (Jan 4th 2018).</p>
1569 Mark Newey, Welsh Government, Plans Branch	4E		Delivery & Phasing – See Appendix 1 for this representation.	The need to evidence deliverability is noted and the need to demonstrate a 5 year housing land supply from the adoption of the Plan. In terms of phasing the Authority does not intend to phase. A trajectory has been prepared and can be found in an Appendix to the Housing Background Paper.

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4303 Mr & Mrs Hunt	4E		<p>c) Anything to amend – YES Provision of additional housing was one of the key areas that failed to reach the set target in the last LDP. It is indicated that further work is required before exact numbers of houses are inserted in the plan but the narrative suggest large scale developments even in smaller local centres.</p> <p>Any plan that sets overambitious targets sets itself up to fail. In the current fragile economic climate, which is not expected to improve for several years, it is doubtful that large schemes are deliverable in terms of resources and finance. This should be reflected in the plan.</p>	<p>Comments noted. Sites are being tested for their deliverability as well as their impacts on the Centres where they are being considered.</p>
4542 Ms Imogen Morley	4E		<p>The introduction to the ‘All Party Parliament group report on housing for older people’ HAPPI3 Report 2016 states “Local planning authorities should also recognise the demographic changes that necessitate stronger encouragement for older people’s housing”.</p> <p>My comment on the Local Plan is that it should specifically include consideration of the need for housing designed for older people – as outlined in this report.</p>	<p>Below are the relevant recommendations:</p> <ul style="list-style-type: none"> - Councils need to ensure their Local Plan gives the necessary priority to older people’s housing needs – not least as a core component of any new settlements and that new developments of retirement housing embrace HAPPI design principles. - Exemption of retirement housing from the requirement to build Starter Homes – or to pay a commuted sum in lieu – would provide the opportunity to prioritise this age group. <p>Response: The issues around such provision is highlighted in the Equalities Impact Assessment for the</p>

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				<p>Plan. The housing market assessment only takes into account bedroom numbers. It would include any older person's needs.</p> <p>There are limitations on the ability to influence the mix of housing. Beyond providing a suitable layout where a mix of dwellings normally provides for a better layout the planning authority can only seek to achieve an element of affordable housing to meet the need as shown in the Local Housing Market Assessment. The Housing Market Assessment provides numbers for overall affordable housing need. The mix (i.e., providing suitable properties for older people) comes when need is addressed for an individual project by the housing authority.</p> <p>Properties will also need to comply with building regulations standards. Compliance with alternative standards would need to be brought forward through Welsh Government.</p> <p>National planning policy asks that all new dwellings should contribute to the delivery of affordable housing. Affordable housing is for those young and old that cannot afford to accommodate their needs on the open market. The approach suggested does not seem to match the situation in this Plan area.</p>
2708 Pembrokeshire County Council	4E 4.257		The overall provision for housing and that for affordable housing in the current NP LDP may have been too ambitious, but was probably closer to the need in the National Park than the more recent proposals.	'Need' in terms of affordable housing need is driving provision. Housing growth overall as forecast in the current Plan was greater than projections would have suggested The figures and commentary in the Chapter explains this sentence further.
2708	4E 4.263		PCC is exploring options to bring	Current position noted. The Authority has commissioned

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Pembrokeshire County Council	(Tenby)		forward the Council's allocated site at Brynhir for housing purposes and favours mixed use proposals for the Butts Field site.	consultants to assist with examining the deliverability of sites in advance of placing the Plan on Deposit.
2708 Pembrokeshire County Council	4E 4.265		In the first sentence, what does the phrase 'when development plans are finally adopted' mean?	It means sites proposed for development have not been included in the final Plan.
2708 Pembrokeshire County Council	4E 4.282		PCNPA could aspire to deliverability that exceeds historic rates of development. There could / should be an element of aspiration in the policy position, even if the Plan is primarily driven by evidence of past performance.	The Authority has sought to meet the tests of soundness in its housing land supply provision.
4545 D Thomas Pembrokeshire County Council	4E 4.296		Access: consideration will be given to suitability of vehicular/pedestrian / cycle access to and from the site?" the order should be changed giving a priority to pedestrian/ cycle /public transport (to be included)/vehicular access to and from the site	Agree. Recommend that bullet point 6 under paragraph 4.296 is amended to read: "Access: Consideration will be given to the suitability of pedestrian/cycle/public transport/vehicular access to the site. Amendment done.
2708 Pembrokeshire County Council	4E 4.306		Change '12 month period' to '6 month period' in the first sentence and also in point a), to match PCC's approach.	The opportunity to report on this and action it will come in the Annual Monitoring Report. Our experience with doing this monitoring is that there is little substantive change so a 12 month analysis is considered appropriate.
2708 Pembrokeshire County Council	4E 4.308		PCNPA is prioritising the delivery of affordable rental accommodation. PCC suggests that, while this is likely to be the main focus of affordable housing delivery, the door should not be shut on low cost home ownership, notwithstanding the	Officers have clarified this comment as the text used in the paragraph mirrors that used in the County Council's own Supplementary Planning Guidance on Affordable Housing. Clarification sought and an amendment has been done to meet the concern.

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			<p>difficulties that have been identified with its delivery. A mix of types / tenures of affordable properties should be sought, even if rental is the main type of affordable provision.</p> <p>Clarification: Perhaps PCNPA might want to allow self-build LCHO, so perhaps the text could clarify that this remains a possibility? In terms of the wider approach, this has not changed and we would support PCNPAs intention to prioritise delivery of rented affordable housing.</p>	
<p>1569 Welsh Government</p>	<p>4E Housing</p>		<p>Affordable Housing Need - Local Housing Market Assessment: One of the key issues for plan revision is the delivery of affordable housing, which fell significantly short of targets in the adopted LDP. Whilst the Authority refers to the 2014 Local Housing Market Assessment (LHMA) which indicates a need for 370 (largely social rented) properties per annum, no LHMA has been included in the evidence base to inform the scale and location of growth in the Preferred Strategy. Policy 45 Affordable Housing, refers to a target of approximately 250 affordable homes, which is around</p>	<p>The Local Housing Market Assessment is referred to in the Housing Background Paper and data provided. A link to the document is also provided. A direct link to the document can be provided on the website background papers pages.</p> <p>Amendment done.</p> <p>The explanation is provided in the introductory text to the Plan. Updates will be provided for the Deposit Local Development.</p> <p>The Local Housing Market Assessment doesn't distinguish between backlog and new provision. It provides a total need.</p> <p>This was provided in the introductory text to the Chapter.</p>

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			<p>22% of overall housing provision. There is no supporting evidence to illustrate how this figure has been derived or how it relates to plan provision. In this instance, the Deposit plan should:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Explain how the LHMA has informed the spatial strategy to maximise the delivery of affordable housing, and <input type="checkbox"/> Include an indication of the overall level of affordable housing need including any backlog. 	
<p>1663 Dwr Cymru Welsh Water</p>	<p>4E Housing</p>		<p>Option 2 – Preferred housing policy approach We understand that the preferred housing policy approach is likely to secure between 940 to 1,100 dwellings and that in order to deliver this number, there will have to be an accord with the spatial strategy. As such, we would advise the LPA to ensure that they take on board our site/settlement specific comments in order that they can demonstrate site deliverability.</p>	<p>Noted.</p>
<p>1663 Dwr Cymru Welsh Water</p>	<p>4E Policy 44</p>		<p>Policy 44 – Housing Strategy We note that the housing allocations are to be included in the LDP at Deposit stage and are pleased to note that the LPA considers infrastructure and financial viability as one of the main criteria for site</p>	<p>Support noted.</p>

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			selection.	
2669 Mr M Bell, Campaign for Protection of Rural Wales	4E Policy 44		Policy 44 Housing. A comma is needed after <i>capacity, provision</i>	Agree amendment done.
1487 Pembrokeshire Housing (Geraint John Planning)	4E Policy 45		Whilst there are no land use allocations identified Policy 45 states that there is a requirement of approximately 245 houses over the plan period. The Local Housing Market Assessment shows a higher need and this should be reflected in Policy 45. – See Appendix.	Yes the Local Housing Market Assessment shows a level of need which is far greater than can be delivered through the planning system. The affordable housing provision shown will be updated for the Deposit Local Development Plan. Provision is primarily dependant on deliverability which is a substantial issue for the Authority with the current Plan, something which Pembrokeshire Housing felt strongly about in recent times.
1569 Mark Newey, Welsh Government, Plans Branch	4E Policy 47		One Planet Development The Welsh Government is generally supportive of local Policy 47 One Planet Development, which needs to be considered against the requirements of national planning policy (PPW, 9.3.11-9.3.12). As worded, Policy 47 could usefully benefit from further clarification in the reasoned justification, for example, in criterion c) what opportunities exist to reuse buildings? Would this include existing dwellings and/or conversions? Would the cost of a conversion make this option 'impractical'? It is important the	Further guidance is provided in the Authority's current supplementary planning guidance and relates to the conversion of buildings. Some of this information has been copied across which should help meet the concerns raised. This criterion relates to conversion opportunities. Amendment done.

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			policy is capable of clear implementation and explanation in the reasoned justification	
2708 Pembrokeshire County Council	4E Table 8		When the Deposit Plan is published, it would be helpful to include a link from the % figures for affordable dwelling provision (right hand column) to the evidence base paper that explains the levels chosen.	This information is contained in the Affordable Housing Study which has been made available at Pre-Deposit consultation stage. An update will be prepared for the Deposit Plan and placed in the Background Papers.
2708 Pembrokeshire County Council	4E Tables 6 and 7		The overall housing provision (1091 units) and affordable housing provision (239 units) are fairly modest aspirations for a plan running from a base date of 2015 through to 2031 (16 years) – that equates to just over 68 dwellings per annum and just under 15 affordable dwellings per annum delivered each year of the Plan.	See previous comment. Also the evidence emerging from the affordable housing study and the review of sites will assist with the affordable housing provision. The Authority needs to also bear in mind the difficulties experienced with the current Local Development Plan and address those concerns.
1569 Mark Newey, Welsh Government, Plans Branch	4F		<p>Retail</p> <p>The spatial strategy sets out the vision for the retail functions within Tenby, the Local Centres of Newport, Saundersfoot and St David’s and the Rural Centres. The South West Wales Regional Retail Study (February 2017) identified the retail market in the Tier 2 and 3 centres to be strong with low vacancy rates. As a result, the study forecasts a need for new retail floor space for comparison goods in these</p>	Additional text has been added at the start of the Retail Section for clarification. The approach, in light of the small scale capacity identified and in the interests of remaining in keeping with the existing retail character of the Centres, is to deliver small scale retail development via the existing criteria based policy. This is considered to have performed well in the existing plan, enabling a range of small scale developments, which the Retail Background Paper highlights. Amendment done.

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			centres. The Authority should explain how they will address the findings of the study.	
1569 Mark Newey, Welsh Government, Plans Branch	4F		Policy 49 Retail in the National Park: Policy 49 sets out the Park’s retail hierarchy which is in-line with the Wales Spatial Plan and the LDP spatial strategy. To add clarity, Criterion C ‘other smaller retail centres’ should be clearly defined in the Deposit plan and on the proposals map so the centres in the retail hierarchy are clear to plan users, for example, does it apply to all Tier 4 settlements or just Solva?	Reference to ‘smaller centres’ has been amended to ‘rural centres’ as defined within the plan for clarification. Policy 6 Rural Centres (Tier 4) (Strategy Policy) provides the overarching policy context for these centres and seeks to permit small scale employment developments and protect and enhance their range of facilities. Amendment done.
4545 D Thomas Pembrokeshire County Council	4F 4.340		Refers to the Joint Transport Plan but also the Local Transport Plan programme as a separate thing. This may be misleading as there is no separate Local Transport Plan but the Joint Transport Plan contains the Pembrokeshire transport plans.	Error noted. Recommend that the last sentence of the paragraph is amended by deleting the words ‘and the Local Transport Plan Programme’. Amendment done.
4545 D Thomas Pembrokeshire County Council	4F 4.347		seems to have a line missing after the last word ‘or’ on page 140.	This is a typographical error. Recommend that the last ‘or’ from criterion c) in paragraph 4.347 is deleted. The following paragraph (currently un-numbered) should be numbered. Amendment done.
4545	4F Policy 53		. Impacts of Traffic –Air pollution	Issues such as impacts on air quality will be considered in

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D Thomas Pembrokeshire County Council			should be specifically mentioned	conjunction with Planning Policy Wales, Edition 9, November 2016, Welsh Government, Chapter 13. The amenity policy, Policy 30.
1569 Mark Newey, Welsh Government, Plans Branch	4F Policy 48		<p>Community Infrastructure Levy (CIL) and Planning Obligations</p> <p>The Authority intends to fund related infrastructure through planning obligations and keep under review the implications of introducing a Community Infrastructure Levy (CIL). With the prioritisation of affordable housing in residential schemes (LDP, paragraph 4.323), the Deposit plan should be clear on this and other prioritised areas in Policy 48 so that contributions can be sought. This will inform the provision of infrastructure/mitigation and avoid sites becoming unviable.</p>	<p>Policy 48 has been amended to address this issue.</p> <p>Amendment done.</p>
1663 Dwr Cymru Welsh Water	4F Policy 48		<p>Policy 48 – Community facilities and infrastructure requirements</p> <p>We support the provisions of this policy, though we would recommend the inclusion of the following wording to criteria c) which would give assurances that our infrastructure will be adequately protected:</p> <p>c) “...suitable arrangements for the protection, improvement or provision of infrastructure...”</p>	<p>The protection of infrastructure will relate to detailed consideration of planning proposals under Policy 29 Sustainable Design.</p>

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2373 Theatres Trust	4F Policy 48	No	The Theatres Trust supports the inclusion of draft Policy 48 in this preferred strategy. It (together with the definition for community facilities in the glossary) clearly reflects requirements in the Well-being of Future Generations Act 2015 to protect and promote community and cultural assets.	Q1a) Support noted.
2708 Pembrokeshire County Council	4F Policy 49 and 4.330		The final sentence of 4.330 says that there are smaller (retail) centres, including Solva. Is there a need for further information about the policy approach to be taken to retail uses in such settlements? This might focus on helping retention of retail uses in such settlements and keeping an appropriate balance between retail and leisure uses.	Reference to ‘smaller centres’ has been amended to ‘rural centres’ as defined within the plan for clarification. Policy 6 Rural Centres (Tier 4) (Strategy Policy) provides the overarching policy context for these centres and seeks to permit small scale employment developments and protect and enhance their range of facilities. In addition, Policy 48 Community Facilities & Infrastructure Requirements will seek to protect against the loss of village shops and other services within these centres. These policies, in combination with Policy 49 and in the case of leisure uses Policy 35 Visitor Economy, are considered to provide an adequate policy context for maintaining a balance of retail and leisure uses in rural centres. Amendment done.
2708 Pembrokeshire County Council	4F Policy 50		The approach taken is similar to that in PCC’s LDP, but perhaps both Plans need to modify their approach (for instance on primary frontages), given the high levels of vacancy in town centres across Pembrokeshire? This will be an issue to consider for the review of PCC’s LDP, but of course it is too early to know what the outcome might be in a PCC context.	With respect to the overall retail hierarchy of the plan, Centre boundaries and strategy, the current policies, for the National Park plan, are considered to be performing well with continuously low vacancy rates. It is acknowledged however that Centres outside of the National Park have experienced higher rates of vacancy.

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4545 D Thomas Pembrokeshire County Council	4F Policy 52		public transport needs to be included and the sentence needs to be finished	<p>It is assumed that this comment relates to criterion c of Policy 52. This criterion relates to the direct access into new developments from the road but could be expanded to include public transport. The sentence is complete – the word ‘and’ after the semi-colon is to indicate that there is another criterion to follow.</p> <p>Recommend that the wording of Policy 52 c) is amended to read: “...vehicles and public transport, where appropriate; and” Amendment done.</p>
4545 D Thomas Pembrokeshire County Council	4F Policy 52		When the Integrated Network Map is approved by Welsh Government which will show our cycle and footway schemes proposed for the next 15 year they can be included in the deposit stage of the plan if the time frame allows. This should safeguard routes.	<p>Noted. The Authority will liaise with Pembrokeshire County Council on this matter. The Authority has liaised with the Council and no schemes require safeguarding.</p>
2708 Pembrokeshire County Council	4F Policy 53		PCC waste management would like reference made to the need for turning circles that will be adequate in size to cater for refuse freighters. This is because it is not considered to be good practice to reverse these vehicles onto housing and industrial estates or other developments.	<p>This is detailed site layout matter which would be considered through the normal development management process. The Highway Authority is consulted on all planning applications requiring roads or access from roads and issues such as the need to ensure access for large vehicles would be part of their considerations and advice. Policy 53 already makes reference to developments needing to be acceptable in terms of road safety which would include access and egress for service vehicles.</p>
4545 D Thomas Pembrokeshire County Council	4F Policy 54		Cycle ways some reference required on cycle parking. There needs to be a specific policy on protection of disused transport corridor i.e railways to convert to cycle routes.	<p>Standards for all parking provision, including cycle parking is included in the Authority’s Supplementary Planning Guidance which will be reviewed for the adopted replacement Plan.</p>

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				Development Plan legislation and guidance has changed. We can no longer safeguard or allocate land for proposals unless there is a realistic prospect of them being delivered during the Plan period. We therefore safeguard schemes which are included as proposals in the Transport Plan or are County Council schemes which are planned and funded for implementation during the Local Development Plan period. Further to discussions with Pembrokeshire County Council there is no need to safeguard schemes.
4545 D Thomas Pembrokeshire County Council	4F Policy 54.		Cycle ways and shared use paths are the same off road but cycle ways can refer to on road quiet road cycle routes so would suggest the title for policy 54 be cycle ways and shared use paths.'	Noted. Recommend that the policy is renamed as suggested. Amendment done.
1092 Bourne Leisure (Lichfields)	4F Policy 55	Include	Bourne Leisure is concerned that, although this policy provides protection against adverse effects on the special qualities of the National Park, it does not provide protection for holiday accommodation from these impacts. It is Bourne Leisure's view that holiday accommodation, and caravans in particular, should be recognised as particularly sensitive to impacts arising from cabling, pipelines and associated development such as pylons, substations etc. The visual impact of such development, particularly over ground cabling and pipelines, and pylons and substations should also be appropriately considered in	Policy 30 already takes amenity into account and includes the need to consider the amenity of places where people live or visit. The suggested addition to this policy is not considered to be necessary.

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			<p>relation to sensitive locations including tourism facilities and holiday destinations.</p> <p>Given the importance of tourism to the local, regional and national economy, Bourne Leisure considers that the Local Plan should reinforce protection for tourist accommodation from potential adverse impacts of powerlines, pipelines and associated pylons and substations. Otherwise, there is a risk that tourists may be deterred by these issues from visiting or returning to the area, thereby impacting on the local economy.</p> <p>Bourne Leisure therefore proposes that the following requirement is included within draft Policy 55: <u>“Such proposals will be rigorously examined with regard to siting and design and will be permitted only where there are no unacceptably adverse effects on the special qualities of the National Park and impact on amenity”</u> [proposed amendments underlined].</p>	
1663 Dwr Cymru Welsh Water	4F Policy 55		Policy 55 – Powerlines and Pipelines We feel that the specific wording of this policy requires amending to clarify that it does not refer to water and sewerage infrastructure. As you will be aware, under Schedule 2,	Paragraph 4.353 of the Preferred Strategy recognises that many proposals for powerlines and pipelines lie outside the scope of normal development control. The policy will be used to guide those proposals requiring planning permission or as guidance in responding to consultations for other proposals.

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			<p>Part 16, Class A, of The Town and Country Planning (General Permitted Development) Order 1995, Welsh Water do not require planning consent to lay sewers or mains. Although we appreciate that 'pipelines' likely refers to gas, to avoid any confusion we feel that specifically referencing the type of 'pipelines' would assist.</p>	
<p>1092 Bourne Leisure (Lichfields)</p>	<p>4F Policy 56</p>	<p>Amend</p>	<p>Bourne Leisure considers that it will be necessary to consider the impact of any telecommunications on tourist accommodation, as such development has the potential to impact on the amenity of the visitors and also the quality of the landscape. Both of these consequences have the potential to deter people from visiting an area and, hence, could have an adverse impact on the local economy. Bourne Leisure therefore proposes that the following requirement is included within draft Policy 56: “Where developments would be visually prominent evidence must be provided to show that alternative locations have been investigated and are impractical. Such proposals will be rigorously examined with regard to siting and design and will</p>	<p>Policy 30 already takes amenity into account and includes the need to consider the amenity of places where people live or visit. The suggested addition to this policy is not considered to be necessary.</p>

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			<p>be permitted only where there are no unacceptably adverse effects on the special qualities of the National Park <u>and impact on amenity</u>". [proposed amendments underlined].</p>	
<p>4569 Sainsbury's Supermarkets Ltd (White, Young, Green)</p>	<p>4F Retail Tenby</p>	<p>Amend Include</p>	<p>The following representations are made on behalf of Sainsbury's Supermarkets Ltd (SSL) by WYG in relation to the Pembrokeshire Coast Replacement Plan.</p> <p><input type="checkbox"/> SSL emphasize the importance of the Replacement Plan's support of the future operations of their existing Tenby supermarket. The provision of supermarkets within centres is a key element of how those centres perform and the role they play in the retail hierarchy. As such, it is imperative to safeguard the Sainsbury's store's ability to continue to serve and provide for the convenience and comparison shopping needs of the existing and growing resident population, and visitors alike. The Tenby store lies just outside of the defined retail centre area on the adopted LDP's proposals map, however, it is considered appropriate to extend the defined town centre boundary in the Replacement Plan</p>	<p>The South West Wales Regional Retail Study 2017 did not identify any additional need for convenience floor space in Tenby. It is considered that any future provision should therefore be encouraged within the core centre.</p> <p>The Sainsbury's store is not considered appropriate for inclusion within the designated Town Centre for Tenby as it is, by virtue of its periphery location, not considered to be read in association with the core centre. The building is not considered to contribute to the historic retail character of the core centre and is separated by a significant gap in the existing retail frontage, which is caused by the multi storey car park and toilet block to the east.</p>

Representor – number and name	Comment on:	Remove Include Amend	Comment	Officer Response and Recommendation
			<p>to include the existing retail store (please see proposed amendment to the current adopted proposals map attached). It is considered this approach would support and be consistent with policies 2, 20 (g), 49 and 50; and</p> <p><input type="checkbox"/> Subject to inclusion of the Sainsbury's store within the town centre boundary, as set out above, SSL support the suggestion that prevailing national planning policy will be applied in the determination of out-of-centre retail proposals (p134). In doing so, the local plan will ensure it takes a consistent and standard approach to such proposals and avoids repetition of national policy, while continuing to support and protect the important role the Sainsbury's store plays in providing for the vitality and viability of the town centre. Without the above change in town centre boundary, however, simple application of national retail policy could fail to protect Tenby town centre by failing to prohibit impact on a store which is a significant attractor of shoppers and contributor to vitality and viability.</p>	

Representor – number and name	Comment on:	Remove Include Amend	Comment	Officer Response and Recommendation
1569 Mark Newey, Welsh Government, Plans Branch	5		<p>Monitoring</p> <p>The monitoring framework should include appropriate targets and key triggers so that action can be taken in advance of the statutory 4-year review if key policies that are fundamental to the delivery of the strategy are not being successfully implemented. Any amendment to policies in adopted plans will need to be considered in accordance with Regulation 41 of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 (as amended).</p> <p>When the Deposit plan is prepared, a large number of LDPs will have gone through the examination process and been successfully adopted. This will provide good practice examples, which the Authority may benefit from to build on the effectiveness of the proposed framework in Chapter 5.</p>	Advice noted. Update as needed for the Deposit Local Development Plan. Amendments done.
4545 D Thomas Pembrokeshire County Council	5 Indicator 31		should read pedestrians cyclists and vehicles	Agree. Amendment done.
2708	5 Indicator 14		Should monitoring be primarily on	Agree. Amendment done.

Representor – number and name	Comment on:	Remove Include Amend	Comment	Officer Response and Recommendation
Pembrokeshire County Council	– renewable energy		the basis of conformity (or otherwise) with the parent policy (rather than the SPG)? As currently worded, it seems that the SPG is picking up some planning issues relating to renewable energy that the parent policy isn't.	
2708 Pembrokeshire County Council	5 Indicator 25		If there are no allocations, this indicator will presumably be deleted at Deposit stage.	Agree but the Authority will need to include an Indicator to monitor provision of employment against the criteria based policies of the Plan. Amendment done
2708 Pembrokeshire County Council	5.1		The first sentence says that the proposals of the LDP represent a change in the scale, location and type of development proposed in the National Park. However, in most cases, the LDP 2 proposals (as far as they are known at present) seem closer to a continuation of the current policies, with some selective updating and a few, mostly modest, changes in direction.	Agree. Amendment done.
4545 D Thomas Pembrokeshire County Council	5.4		there should be a priority g - Transport and accessibility	This list relates to the Chapter headings and f) already includes transport.
2708 Pembrokeshire County Council	6 Use Classes		Insert additional rows for recently introduced Use Classes C2A – Secure Residential Institutions and C4 – Houses in Multiple Occupation.	Agree. Amendment done.
2708	7 Key Diagram		The classification of settlements should be restricted to those in the	Agree. The Key Diagram has been checked and it matches the approach taken in the Wales Spatial Plan.

Representor – number and name	Comment on:	Remove Include Amend	Comment	Officer Response and Recommendation
Pembrokeshire County Council			National Park (including cross-boundary ones), unless derived from a higher level document such as the Wales Spatial Plan.	
2708 Pembrokeshire County Council	8 Waste Background Paper Page 22		The section on ‘how well are we performing’ could be updated to include 2015/16 data. The level of preparing for reuse and recycling / composting (or anaerobic digestion) for municipal waste was 64.92%.	Agree. Amendment done.
2708 Pembrokeshire County Council	8 Waste Background Paper Page 23		This could be updated to include 2015/16 data. The BMW (biodegradable municipal waste) landfilled was 6,523 tonnes. In 2016 the landfill tax stood at £84.40 per tonne.	Agree. Amendment done.
2708 Pembrokeshire County Council	8 Waste Background Paper Page 24/25		On item 65, PCC agrees that further collaboration needs to take place, however there isn’t a paragraph 70 to comment on (paragraphs end at 68).	Agree. This is a typographical error referring to a previous draft. Reference to paragraph 70 deleted.

Appendix 1

339 Mrs S Bayes 4 Newport

(All emphasis is my emphasis) (All figures are 2011 Census figures unless otherwise stated)

Newport has a huge demographic imbalance.

In 2011, nearly 40% of Newport residents were already over retirement age (compared to the national figure of 23%).

The Local Authority Population Projections for Wales (2014-based) state for Pembrokeshire that numbers of over 75s are set to increase, and of over 85s expected to double by mid-1939. Newport already has a very high proportion of over 75s and over 85s.

Newport strives to be an Age-friendly community - promoting people's social engagement and developing support and relationships between the generations. Physically, it is far from Age-friendly at present, and we need the National Park to recognize this and help us in improvements to physical design, better access, mobility and pedestrian safety.

We do not know, but need to know the condition of existing housing stock in Newport and its suitability for older people.

9 % of houses in Newport ward have 5 bedrooms or more, compared with 4% nationally. Nearly 50% of resident households have a bedroom occupancy of 0.5 persons or less. 41% of Newport residents are in single person households. 55% of single person households are occupied by people aged over 65.

Wales adopts an "ageing in place" approach, recognising that most people want to stop in their own homes with their own possessions for as long as possible. Whilst it is true that till now, many older people have only moved late in life or at a time of crisis, for example when care needs or health problems become unmanageable, people are becoming more alert to advance care needs and, in any event, much of this reluctance to move is caused by the fact that many older people are unaware of their housing options, or in many cases – as here in Newport - have few options currently available to them.

There is growing evidence that this does not preclude moving to accommodation more suitable to later life needs, given that opportunity, especially if people are thereby enabled to stay in their own neighbourhood (See Peace et al 2011; HillcoatNallétamby & Ogg, 2013, and Our Housing Agenda:

Meeting the Aspirations of Older Persons in Wales 2016). Recognition of this is also expressed in Wales' Community Cohesion Strategy (Welsh Government, 2009) and Vibrant and Viable Places (Welsh Government, 2013).

Whilst accessibility of the home itself is important, it is also important that people can get out and about around their home. Any suitable sites in Newport providing safe pedestrian access to services, shops and community facilities should be earmarked, with housing meeting the needs of older people given priority. At the same time, appropriate parking at shops and community facilities is needed, but Newport's provision is far, far from adequate.

The Expert Group on Housing an Aging Population recommends designation of particular sites in town centres for older people's housing. There are already precious few sites left in Newport suitable for the purpose.

But demand for appropriately designed older people's housing in Newport is undoubtedly set to increase. Many older people in Newport seek to downsize

The social benefit to Newport of older people freeing up larger stock, could be significant.

Whilst the Authority does list an ageing population as an issue in the text to Policy 3, nothing is said about the implications of this in planning terms. Whilst PPW gives little encouragement to a planning authority to tackle this issue at the moment, The Welsh Government Report from the Expert Group on Housing an Ageing Population in Wales January 2017, has called for a planning system which realigns with health, social care and wellbeing of future generations policy, and which prioritises the ageing population, with key actions including a clear national policy; amendment of PPW to encourage mixed, Age-friendly, lifetime neighbourhoods and to attach greater national weight to older person's housing provision and to encourage a range of innovative solutions to meet the housing needs of an older population; strengthens practice guidance through assessment of full housing demand and need of older people and reflects this in the overall housing and five year land supply, separately identifying specific needs and setting numerical requirements for older people in the LDP; writes criteria based policies in LDPs clarifying the circumstances in which schemes will be allowed with a presumption that planning permission will be granted for properly formulated proposals; identifies and targets specific areas and particular sites suitable for such provision; and formulates of local 'exceptions policies' for housing for older people in rural areas. (Section 4 Pages 36 to 37)

The report also calls for consideration to be given to a full nationwide exemption from affordable housing obligations and perhaps from some other specific planning obligations too, and from the Community Infrastructure Levy, over a limited period of (say) five years, so-as-to kick-start the market. It suggests conferences and seminars to promote the enhanced policies, and guidance ensuring wide engagement with house builders; housing associations; and housing, social care, health and well-being professionals and comments that "*The 4 yearly reviews of Local Development Plans provide the ideal opportunity to integrate new approaches and policies*"! Very regrettably, this report has not recognised the value of community input and supported the development of neighbourhood plans in Wales.

Being ahead of others in replacing its LDP, PCNPA could also be leading the way by looking, together with local communities, justifiably using Newport as a pilot, at the connections between housing, health and well-being in the Park, and the challenges that our ageing population poses for housing needs. Quite apart from the strong link between better health and wellbeing and better housing, there are huge benefits through making provision for appropriate housing for older people, for the local NHS and on reducing overall local government spend. We need the Authority to join in with this community, with the Health Board and County Council, in an integrated approach to thinking about the place in which we live and in developing appropriate planning policies to promote older people's well-being and engagement with their physical and social environments, and to ensure that appropriate housing is available to them in future, within a community physically improved to lifetime standards.

Officer Response:

1. Please see above response to submission **4542 Ms Imogen Morley in the main schedule.**
2. Analysing the condition of existing housing stock would be a matter for the housing authority.
3. The Preferred Strategy refers to traffic management improvements more generally but the lead for such would be with the relevant highways authority
4. On specific proposals Policies 52 and 53 provide a context for dealing with some of these issues.
5. The Authority has adopted Supplementary Planning Guidance on Parking which requires the appropriate levels and type of parking facilities for each development type, taking into account users of the development and availability of public transport. The Guidance will be updated for the adopted Replacement Plan.
6. Building Regulations require both domestic and nondomestic buildings to be built so that people, including disabled people, can reach the principal, or suitable alternative, entrance to a building from the point of access. For the adaptation of historic buildings however, accessibility measures are balanced against the impact upon the historical character and interest of those buildings.
7. Dwellings that are built to the Lifetime Homes standards, such as those built by a Registered Social Landlord, include additional requirements to Building Regulations, for example requiring entrances to be lit and covered. This is not a national requirement at present.
8. Technical Advice Note 12: Design promotes key design principles such as ease of access for all, community safety and safe and clear movement routes that are fit for purpose.
9. The Authority consults with an 'Access officer' to advise on the accessibility of proposed buildings when considering planning applications for buildings and public open spaces.
10. Building Regulations does not require scooter storage areas.

11. Any amendments to Planning Policy Wales or other national planning policy in response to The Expert Group on Housing an Aging Population will need to be considered by the Authority when published.
12. The Authority would be willing to consider being part of any wider pilot initiatives.

339 Mrs S Bayes 4 Policy 3 Newport

1. The National Park clearly accepts that *“The percentage of homes used as second homes and holiday homes in some Park communities is likely to impact on the nature of those communities”* (LDP2 Scoping Report 18)

In the Preferred Strategy at §4.32 under *Issues for Newport*, it is stated *“Difficulties for Newport include high house prices and a shortage of land for developing affordable housing. A high number of holiday and second homes is of concern as is an ageing population. The use of the Welsh language is declining”*

2. I refer to the DRAFT Preferred Strategy for Pre-Deposit Local Development Plan (Replacement) for Consultation

The Report 22/17 to the meeting of the full Authority 15th May 2017 Agenda Item 3 Preferred Strategy 3rd item Summary Report of Consultations -“Report of Consultations Pre - Formal Consultation on the Preferred Strategy Pembrokeshire Coast National Park Replacement Local Development Plan Includes comments received up to 7th April 2017”

Table 2 “Changes Not Made” Page 19 “Newport Local Centre (Tier 3) (Strategy Policy)”

“Suggestion: Require housing to be used as a principal residence.”

“Response: This would be contrary to national planning policy in Wales. See Housing Background Paper for commentary”

N.B. It is not made clear that Newport Town Council’s proposed “amendment” put to the Authority, concerned new housing only.

As you gave no proper references, I have reread the whole LDP2 Housing Background Paper as updated April 2017 to try to understand why this proposal *“would be contrary to national policy”*. At paragraph 10 (page 6) under Planning Policy Wales (PPW) 9th Edn. Nov 2016, reference is made to § 9.24 – which seems to contradict your assertion above.

PPW 9 states at 9.2.4

“Local planning authorities, in partnership with the community, including the private sector, must develop policies to meet the challenges and particular circumstances evident in their areas in specific locations. If these policies need to diverge from national policies in order to meet specific local housing needs for market housing (which normally would have no occupancy restriction), local planning

authorities will need carefully to justify the variation with robust evidence that they deem appropriate. The justification might be in terms of, for example, land supply, environmental or social impacts in combination. Evidence could be adduced from local studies such as those deriving from the community strategy, or from studies forming part of the evidence base for the development plan. The sustainability appraisal, including the Strategic Environmental Assessment, would be part of the evidence base providing justification for a departure from national policy.”

Thus, PPW **supports** divergence from national policies to meet specific local housing needs where this is justified with evidence.

3. As you know, St Ives has included a similar *sole or main residence* policy in its Neighbourhood Plan. I refer you to the 'Strategic Environmental Assessment (SEA) directive), The Environmental Assessment of Plans and Programmes (Wales) Regulations (SI 1656-04)(W170) - because this was the law referred to by Mr Justice Hickinbottom in his recent judgement (Oct 2016) in the High Court in relation to the St.Ives case. §§s 32-57 give Justice Hickinbottom's take on the need for a LPA to produce a '*reasonable alternative*' strategy in addition to or as well as a '*preferred strategy*' document.

I would argue that according to the SEA Directive, the Authority is obliged to look at Newport's "*suggestion*" for new housing in much greater depth and as one "*reasonable alternative strategy*". It is not enough to simply state that Newport's "*suggestion*" is "*contrary to national planning policy in Wales*", without explaining exactly how you consider this to be the case.

4. I am fully aware that the Authority has considered 2 options for housing and affordable housing policies and that the preferred policy option is "*providing for market housing to cross subsidise the provision of affordable housing.*" (Option 2. PCNPA Replacement LDP (Preferred Strategy) Draft Page 146) The policy that has been put forward for Newport by Newport Town Council differs from Option 2, only in restricting new housing here to sole or main residency.

5. The only other statement that appears to relate at all to this issue in the Housing Background Paper, concerns a Policy put forward for the Pembrokeshire Joint Unitary Development Plan (JUDP), over 11 years ago and rejected by the Inspector. A summary of comments on a *Local Needs Policy* (policy 47), then considered, is given from the JUDP Inquiry Inspector's Report (3.48.1 to 3.48.17) at paragraphs 58 to 60

Mr MacDonald's remarks are not directly applicable to Newport's current "*suggestion*". Newport Town Council's strategy proposal for LDP2 policy 3a) is not for "*Local Needs Housing*" but a policy that restricts new housing for use as a "*sole or principal residence*", as put forward in the St Ives Neighbourhood Plan. Just as in St Ives, sole or main residents could live here but work elsewhere.

It would not be the case as Mr Macdonald asserted for the then JUDP policy 47 that there would exist an "*artificial distinction between affordable housing for local people and housing for local people*", that the future new market housing in Newport would "*in effect be affordable housing provision*". At the moment, particularly older people who are already house owners and can afford market housing often leave (acknowledged to be a significant reason for a reducing population) because they cannot find

suitably designed accommodation here to meet their needs. It would thus not be true as Mr Macdonald claimed that *“The amount of housing the Policy could provide was negligible”*, it would only require that only market housing appropriate to meet the needs of those who want to live here is provided in future.

As for the workability of such a policy, PCNPA would be benefiting from the fact that the people of St Ives and Cornwall Council having bravely gone forward before.

6. I refer you to the recent High Court judgement concerning the St Ives case which found the policy in the St Ives Neighbourhood Plan that prohibits new dwellings being used as second homes to be lawful.

Mr Justice Hickinbottom said he was *“unimpressed”* by arguments that second and holiday homes caused no real harm to the seaside town. He agreed with the inhabitants of St Ives that *“communities are being eroded through the amount of properties that are not occupied on a permanent basis”*.

In fact, in Mr Justice Hickinbottom’s judgement, further development in St Ives was *unsustainable without the proposed restriction on occupancy to sole or principal main residence*

7. At §§s 58-71, Mr Justice Hickinbottom’s Judgement, he explains the evolution of the projected housing needs figure for St Ives as a vital part of the consideration of the evidence based case for their *‘sole or principal residence’* policy criteria, and in particular, at §61, of the Full Objective Assessment of Need for Housing (“FOAN”), the writing of which was one of the LPA’s duties in the production of a Development Plan.

Would you be good enough, please, to let me know what FOAN figures PCNPA has for Newport on which you base policy 3a)

The proportion of 2nd homes in St Ives in 2011 is said to have been 25%, a significant increase on the 2001 Census figure. So what figure do you use for Newport and how much has this increased over the previous 10 years? It is very notable that whilst you made a stab at a proportion of second homes in the supporting text to policy 3 in the current LDP, you have simply omitted to give any figure at all in the Draft Preferred Strategy.

For, you have reported in the revised LDP2 *Scale of Growth Background Paper 2017*, paragraph 90, that according to the latest National Park household projections, the resident population of “Newport” will have decreased between 2011 and 2031 by 50 people, so that the annual household provision required for the resident population is minus 3 – or minus 52 over the plan period. The Local Authority Population Projections for Wales (2014-based) (published 26th September 2016) state that Pembrokeshire is expected to suffer a further population fall between 2014 and 2039.

8. Who will occupy all these new houses in Newport if your Option 2 for housing is adopted, unmodified, to meet this community’s particular needs?

If all the sites proposed for allocation in the LDP2 Preferred Strategy are totted up, including those about which favourable prospects are suggested by the Authority, (but not even including the possible windfall

sites), then we are already talking about as many as 77 new houses in Newport over the Replacement Plan Period.

That's more than 10% increase in the number of dwellings - to coincide with a 6% reduction in population, according to your figures as given above and if the estimated current Newport population is taken to be as in the text of LDP2 Policy 3 in the Preferred Strategy (Draft)

9. Have you really stopped to think how your existing policy 3a) will affect Newport in the future?

If current trends are followed, as is most likely, then it will be 2nd home owners and self-catering businesses, bought as an investment, occupying new market housing if the current preferred option 2 is adopted. And a high proportion of users will not be Welsh speakers.

This is not what Newport needs. The community is "*being eroded through the amount of properties which are not occupied on a permanent basis*" – a phrase from the St Ives Neighbourhood plan , but equally applicable here, if not more so.

10. According to the 2011 Census, 38% of households were already "*not in full time occupancy*" here in Newport ward (2nd homes, self-catering businesses and mobile homes). In addition, nearly another 9% of households had a second address elsewhere. Anecdotally, local people will tell you that this proportion for Newport is rising all the time. Talk to any estate agent, and they tell you that more than half the houses sold recently in Newport ward, old or new, are now 2nd homes. It is a fact that all the new houses on Will Phillips Yard, the only development in Newport since 2015, and currently being completed, bar one small unit which is at the moment being retained by the builder, have been sold as second homes.

It is these figures which matter socially and economically in Newport, and to you as planners, rather than anything from County Council Council tax lists, as in reality, getting on for half the homes here are not occupied for much of the year, with the accompanying adverse effect on wellbeing of this community, whilst by stark contrast, packed holiday accommodation puts tremendous stresses on our fragile environment during the season.

11. The developer who brought the St Ives case, argued that the "*principal residence requirement*" was an unjustified interference with Article 8 of the European Convention on Human Rights (ECHR), that being the right to a home, which would be enjoyed by future occupiers of dwellings subject to restriction.

It was noted that while the Article 8 rights of a future occupier of a dwelling subject to the second home proposal might be interfered with, (if for example, unforeseen circumstance meant the occupier had to move away from St Ives), this did not mean that the polices themselves breached Article 8 ECHR.

Justice Hickinbottom said he considered the policy to be in "*pursuit of legitimate public interests identified in Article 8, namely the interests of the economic well-being of the country, and for the protection of the rights and freedoms of others*".

Importantly, therefore, in Mr Hickinbottom’s judgement, *human rights legislation is not breached by restrictions on the occupation of housing in this way* (one of the principal reasons for Mr Macdonald’s rejection of the proposed JUDP Policy 47, 11 years ago)

12. PCNPA should now be prepared to consider Newport’s proposal for new housing very seriously and in depth – especially in view of the fact that ONS statistics show that we already have a higher proportion of households *not in full time occupancy* than St Ives.

13. What sort of housing does Newport need in future? In answering this, St Ives has the advantage over Newport, having developed a Neighbourhood Plan. It is 14 years since the last Housing Needs Survey was carried out here, which is the only sure way of coming close to establishing need.

When Newport Area Environment Group worked to try to achieve adoption of the Localism Act in Wales – which led to the introduction of, and financial support for, Neighbourhood Plans in England - we were told that this was unnecessary here because of Wales’ existing sustainable development legislation. We now have the Wellbeing of Future Generations Act, but this seems to have had little effect on the planning system, as yet.

PCNPA has but 4 larger settlements - Tenby and Saundersfoot in the south east, and St David’s and Newport in the north, yet, you have stated that *“It is not the Authority’s intention to prepare individual (neighbourhood) statements for areas within the National Park.”* (Letter from Richard James 21st July 2017) I put it to you that, as a result, you cannot and do not properly understand the planning needs of at least this community.

What is certain however, without any deep analysis, is that Newport does not lack housing suitable as holiday homes and needs no more to be built: any precious development opportunities should be devoted to meeting the needs of people of any age who want to live here, and encouraging and enabling younger people to do so, whilst also encouraging employment opportunities for them.

14. Besides affordable rented housing, and general market housing for sole or principal main residence, Newport needs residential accommodation, including

- low cost homes, for those aspiring to ownership. In 2011, over **66%** of households here were in Council Tax band E-F compared with less than 25% nationally. Many people trying to work here, also aspire to buy their own home, but cannot afford Newport house prices.
- Live-work units. Planning for Sustainable Development states that *“Development Plans should identify new opportunities for home/work developments”*. In 2011, there were **27%** *“small employers and own account workers”* in Newport compared with 11% nationally. How many of these, as well as others who would like to come to or return to live here to run businesses, would benefit from the opportunity to move into an appropriately designed live-work unit here, were that available?
- A range of housing for older people – e.g. lifetime smart housing with small easily maintained outside space; through new forms of sheltered and retirement housing to intermediate care units – as well as opportunity to explore more innovative solutions such as cooperative living - to provide appropriate accommodation, for this settlement has the highest proportion of

residents over retirement age in the whole of Pembrokeshire, yet much of the housing is not Age-friendly. Many leave reluctantly to find suitable homes elsewhere, which is disruptive for them and de-stabilising for this community.

I take the opportunity to discuss the latter further in the appended statement

Newport's sustainability, if the current LDP2 Preferred Strategy policy 3a) is finally adopted, will surely be in doubt. We have little hope of achieving the homes we need here, without a re-written LDP2 policy 3a). The only way to see the construction of appropriate homes is by introducing a more appropriate housing policy, prohibiting 2nd home ownership of new-build housing. Only then, will owners and developers provide the sort of homes needed for people who want to live here, rather than maximising their profit by aiming at the second home and the self-catering business market.

Cross-subsidy of affordable housing by market housing will still be viable.

Officer Response

1. The commentator asks the Authority to consider another option for housing provision where the occupancy of new development is controlled as a Principal Residence.
2. The submission has been considered as requested, i.e. as an additional housing option, (see revised Sustainability Appraisal and Alternative Options Background Paper), and this has not resulted in it becoming the preferred housing option for the Plan.
3. It did not perform as well as others. Concerns include the ability to justify a divergence from national planning policy, the impact of the policy in practice. Would it really be the right solution for this National Park? What would be the unintended consequences of implementation? Would there be practical difficulties of enforcement? Would it meet the soundness tests? These are issues which when explored resonate with the Authority's experience in seeking to include a local needs policy some time ago as summarised in the Background Paper for Housing.
4. With regard to specific queries raised the Authority relies on the Local Housing Market Assessment for housing need figures which is the requirement of Planning Policy Wales. The reference to a 'FOAN' document is not familiar one in Welsh planning policy terms. Substantive amounts of affordable housing are required.
5. With reference to identifying the number of second homes in any community in Pembrokeshire this is a difficult exercise and it depends on the reference and definition used. It is particularly difficult as the impact of changes to the Council Tax system has seen the categorisation of properties change.
6. In terms of the preferred option for housing as published in the Preferred Strategy the provision of market housing serves to deliver/subsidise affordable

housing. Market housing is housing that is not subject to an occupancy condition so could conceivably be used for holiday let, a second home or a main residence. If a principal residence occupancy control was placed on all housing then affordable housing could not be secured save for exceptional land releases which tend to be small in number. Delivering affordable housing is a key objective for the Authority.

7. On balance the achievement of affordable housing is seen as the preferred option.
8. It is difficult to see how a restriction regarding principal residency is any more likely to guarantee residents to be Welsh speaking.
9. Low cost homes: It is difficult to delivery these through the planning system as set out in the reasoned justification to Policy 45 Affordable Housing.
10. Live/work units: The Authority has included an allocation for live work units in the current Plan which has not come forward.
11. Older person's housing: The Plan's Spatial strategy seeks to focus development in locations that have facilities and are supported by a public transport network. (see the Plan's Vision and Spatial Strategy).
12. Beyond providing a suitable layout where a mix of dwellings normally provides for a better layout the planning authority can only seek to achieve an element of affordable housing to meet the need as shown in the Local Housing Market Assessment. The Housing Market Assessment provides numbers for overall affordable housing need. The mix (i.e., providing suitable properties for older people) comes when need is addressed for an individual project by the housing authority.

1092 Bourne Leisure (Lichfields)

Visitor Economy, Employment

Chapter D of the draft LDP refers to the visitor economy and employment and is therefore of greatest relevance to Bourne Leisure.

Draft paragraph 4.187 includes the following statement:

“The strategy for visitors is to attract an optimal number, origin, type, duration of stay and spend of visitors all year round while ensuring that National Park environment continues to hold its attraction as a landscape of national and international importance.”

Bourne Leisure endorses this emerging strategy, which seeks to maximise the benefits of the tourism industry for the local economy whilst preserving the value of the National Park environment, which is a key driver in attracting visitors to the area.

Paragraph 4.188 further notes that:

“...the future for the National Park in this Local Development Plan is one whereby the end of the Plan period a range of quality holiday accommodation, similar to the level and distribution of provision at the beginning of the Local Development Plan period, is retained to suit a range of pockets. Some additional caravan and camping provision is provided for along with changes within sites which allows for more innovative approaches to provision to be considered.”

Bourne Leisure supports the strategy for allowing additional caravan and camping and changes within sites. However, the first sentence within the draft supporting paragraph 4.188 notes that there will be a similar level and distribution of accommodation by the end of the Plan period as in the beginning. Whilst it is not explicitly clear what is meant by ‘level’, and whether this refers to scale and /or net numbers of pitches, the sentence implies that the draft LDP strategy does not support new sites or the extension of existing sites where there is a net increase in pitch numbers, which is not the case.

The emerging LDP strategy, overall, supports the provision of additional caravan and camping, where appropriate. This position is indicated within draft Policy 35, criterion a) which allows for limited caravan camping and chalet development and within draft Policy 38A which notes that new caravan, camping and chalet sites, changes within existing sites, and extensions to existing sites “will be considered”.

It is important that the new LDP provides a clear and consistent policy strategy for the visitor economy, particularly given the vitally important role of the tourism industry in the National Park. Bourne Leisure therefore considers that the supporting paragraphs within Chapter D should align with draft Policy 35 and with draft Policy 38A, which allows for new caravan, camping and chalet sites, changes within existing sites, and extensions to existing sites, where appropriate.

Bourne Leisure requests the following amendments to supporting paragraph 4.188:

“the future for the National Park in this Local Development Plan is one where by the end of the Plan period a range of quality holiday accommodation, similar to the level and distribution of provision at the beginning of the Local Development Plan period, is retained provided to suit a range of pockets. Some additional caravan and camping provision is provided for along with changes within sites which allows for more innovative approaches to provision to be considered”

[proposed amendments underlined].

Officer Response

1. The distribution of visitors to the National Park continues to show a significant peak during the main summer holiday period. Rather than to continue to add substantially to the existing supply of holiday accommodation, the strategy is to encourage occupancy throughout the year. This is the most sustainable approach to supporting the tourism economy in Pembrokeshire as well as balancing visitor needs with the sustainability of our towns and villages in terms of services and facilities and those who rely on them throughout the year.

1092 Bourne Leisure (Lichfields) Policy 38A

Bourne Leisure endorses the Council's proposed approach to caravan, camping and chalet development. However, the Company is concerned with the restriction which indicates that consideration will only be given to those new sites and changes within sites that are located away from the coast and the Preselis and in locations not inter-visible with them. The Company is also concerned with the restriction of extensions with no increase in pitch numbers, on existing sites that have highly prominent parts and are visible from the coast and inshore waters.

Bourne Leisure's sites within the National Park are located in coastal areas and have a close functional and visual relationship with the countryside and the sea. This is also the case for many other caravan, camping and chalet sites within the National Park (and across the country).

One of the Company's overriding aims is to continually improve the quality of visitor accommodation and facilities. For Bourne Leisure to continue to attract customers, the Company has to invest regularly, to maintain a product that meets customers' expectations. In particular, the Company seeks to ensure that the facilities at all of its sites are good quality and well-maintained, necessitating a programme of replacing older facilities and making environmental improvements.

A lack of investment would result in stagnating facilities attracting fewer visitors, and therefore, falling income. This harmful outcome for the Company would, in turn, have wider detrimental effects on the local economy (e.g. reduced employment and local spending). Bourne Leisure, therefore, has active development programmes for the maintenance and enhancement of all of its sites, including those within the National Park, and they are under continual review to ensure that the facilities provided are adapted to respond to changes in the tourism market. Expansion of existing sites may also be required in some circumstances, e.g. to facilitate the provision of new facilities and to meet higher amenity standards, whilst taking into account the specific environmental constraints imposed by a site's location and nature designations. Therefore, it is appropriate that the emerging LDP provides support for appropriate changes within existing caravan, camping and chalet sites located near the coast.

The Company is concerned therefore that draft Policy 38A does not take account of the tourism economy's requirements, nor patterns of development in the tourism industry, as a major generator of local employment. It is necessary that planning policies recognise this fact and allow existing tourism developments, which are often located in coastal areas and /or visible from the coast, to respond to the changing demands and needs of the sector, in order to promote economic growth within the National Park.

Bourne Leisure considers therefore that it is important that individual sites are considered on a case-by-case basis with flexibility allowed so that applications are considered on their merits, taking into account site specific considerations, such as mitigation measures proposed and the social, visual, environmental, and economic benefit of the development.

Bourne Leisure therefore requests the following amendments to draft Policy 38A:

~~New Caravan, Camping and Chalet sites and changes within existing sites will be considered away from the coast and Preselis and in locations not inter-visible with them, including a net increase in accommodation will be supported.~~

~~Extensions to existing sites will be considered where the extension is in a well-screened location.~~

~~Extensions to existing sites with no increase in pitch numbers to achieve clear environmental improvement in relation to landscaping and layout will be permitted where existing sites have highly prominent parts, often visible from the coast and inshore waters, and where extensions allow pitches to be transferred to more discreet locations.”~~

~~..... “Development proposals that could result in adverse impacts on the environment or amenity will be considered according to their merits on a case-by-case basis, and subject to appropriate mitigation measures which address any negative impacts”~~

Officer Response

1. This policy approach has been operating in the National Park for the last few decades, with regular review as each Development Plan has been drafted or updated. The basic premise is the high level of camping and caravanning accommodation already available in the National Park, which is for the most part a narrow coastal strip. The approach set out in the Preferred Strategy allows some relaxation of the current policy by allowing small increases in accommodation in line with the findings of the Caravan, Camping and Chalet Assessment Report (November 2015). The assessment clearly indicates that some areas of the National Park are already saturated with caravan and camping accommodation whilst in other areas the landscape sensitivity would be compromised by additional or new development. Policy 38A, as drafted is considered to be the appropriate response to the findings of the assessment. Based on the experience of the last few decades this will not preclude site providers from making sensitive changes which allow them to respond to changing demands within the nationally designed and protected National Park landscape.

1487 Pembrokeshire Housing (Geraint John Planning) Policy 5 St Davids

Policy 5 - St Davids Local Centre (Tier 3)

Whilst our client understands the justification within the 'Preferred Strategy' of allocating St Davids as a Tier 3 'Local Centre', it is considered that allocating St Davids as a Tier 2 'Tier 2 - Local Service and Tourism Centre' is more appropriate. The justification for this amendment is set out below. As stated within para 4.21 of the 'Preferred Strategy' document, towns and villages in the National Park have lower order roles and are included as either Tier 2 or Tier 3 Centres. The differing Tiers are set out as follows:

- a) Tier 2...Centres have a service centre, employment and tourism function.
- b) Tier 3...Centres are principally local centres with some being significant tourism centres.

As specified in para 4.41, there are several key issues for St Davids which need to be addressed, and these are as follows:

“Neighbouring St Justinians and Whitesands Bay are also major tourist attractions which bring visitors to the area and add to the traffic management issues in and around St Davids. The existing Celtic Coaster service plays a part in resolving these issues. Affordable housing provision is necessary and the impact of second and holiday homes is a concern” [GJP emphasis]

As specified in para 4.41, there are several key aims for St Davids which are to be met, and these are as follows:

“The future for St Davids by the end of the Local Development Plan period will see it having had new housing developed in the town including an element of affordable housing. Significant cultural investment has taken place with the Cathedral Cloisters project and the Landscape Gallery Oriel y Parc. Community and retail facilities are adequate to serve the needs of the local community. Traffic management measures have mitigated the adverse impacts of through traffic and traffic movements within the town and have addressed the traffic management issues at St Justinians. The City’s role as an attractive historic centre is protected and enhanced and the hotel and guest house accommodation is adequate to serve the needs of visitors” [GJP emphasis]

In light of these issues raised, it is considered that the designation of St Davids as a ‘Tier 2 - Local Service and Tourism Centre’ would be a more appropriate designation in order to overcome the issues identified above, and act as a ‘centre’ with a tourism function, as stated within para 4.21 which sets out the role and function of a tier 2 centre. This designation would ensure that St Davids is allocated appropriately scaled development to sustain and enhance the tourism offer and become a quality tourism destination. This designation would therefore allow St Davids to adhere with ‘Priority D – Visitor Economy, employment’ and ‘Policy 35 – Visitor Economy’ of the preferred strategy to be met and complied with. Moreover, in doing so, this would assist in overcoming the issues identified in para 4.40 that St Davids needs to overcome through this plan period.

The Role of Tourism

Paragraph 4.38 of the Preferred Strategy clearly advocates and identifies the importance of St Davids has in terms of tourism for the National Park:

“Today, St Davids and its peninsula forms one of the most important tourism resources in the National Park. The Wales Spatial Plan Framework acknowledges the important role St Davids plays as a tourist destination.” [GJP emphasis]

This echoes the appropriateness of designating St Davids as a ‘Tier 2 - Local Service and Tourism Centre’ as this would conform with the Wales Spatial Plan section 18 – ‘Pembrokeshire – The Haven’ which identifies St Davids as a ‘tourism focus’.

The ‘Faith Tourism Action Plan for Wales’ identifies that visitors to Wales are increasingly interested in visiting historical attractions, and for overseas visitors, visiting historical sites is the most common reason for visiting Wales. Page 3 of the ‘Faith and Tourism Action Plan for Wales’ states that:

“Places of Worship are amongst the most visited visitor attractions in Wales and in 2011, St David’s Cathedral was the 7th most popular free visitor attraction in Wales.” [GJP Emphasis]

Whilst the Visit Wales Attraction Survey 2015 illustrates that there was a 7% increase in visits from 2014 – 2015, from 257,000 visits in 2014 to 275,700 visits in 2015. There has been a general increase in visits since 2011 where 262,000 visits took place.

As stated above, the designation of St Davids as a ‘Tier 2 - Local Service and Tourism Centre’ is considered to be fully appropriate and sympathetic to the role St Davids plays a tourist destination and given the unique role of faith tourism plays in Wales, it is considered that this justifies this change.

Scale of Growth

The scale of growth proposed for specified areas of Pembrokeshire are set out in Policy 20 of the LDP – Scale of Growth (Strategy Policy), where there are several criteria identified which set out the aims and objectives of the Policy. For example, point G. states:

“For retail, it is proposed to encourage the sympathetic regeneration of Tenby, Saundersfoot, St Davids and Newport so that they can continue to remain attractive places to live and visit; provide a valuable

role in meeting the needs of local communities and visitors, and attract niche retail opportunities.” [GJP Emphasis]

In light of the significant emphasis outlined within the previous section of the importance St Davids is in terms of a national and regional tourist destination, for any regeneration to be sympathetic to this role, a Tier 2 designation would therefore be more appropriate for St Davids.

Summary

It is therefore proposed that Policy 5 is amended to designate St Davids to 'Local Service and Tourist Centres – Tier 2'.

This would therefore allow for sympathetic levels of growth to be attributed to each of these towns, and it is considered that the amended designations would comply with the aspirations of Policy 20.

Reference will be made, both in this, and the ensuing section, to the Settlements Capacity Study for Broad Haven, which forms part of the adopted Local Development Plan evidence base. The settlement of Broad Haven is described as follows:

'A medium-sized nucleated settlement with an open coastal aspect to the west onto the broad sweep of St. Bride's Bay. Rocky cliffs frame the views out from the broad stretch of sandy beach. Recent residential development has extended outwards from the small, mainly Victorian core up the lower slopes of the rising landform to the east. The development still lies well below the horizon and the landform provides visual containment. Important 'green wedges break up the built form along stream valleys in the north and south. The caravan park in the north is particularly well screened from view. A seaside village very popular with visitors attracted by the beach.'

3.2 In combination with Little Haven, collectively known as 'The Havens', Broad Haven has all the characteristics of a small seaside town, with a distinct centre focused on the junction of the B4341 and Marine Road. This includes a Londis supermarket (incorporating a post office), a public house (The Galleon), a sports shop, beach shop and 2 cafés/takeaways. Other commercial units are located further along the seafront. Little Haven also accommodates several pubs and cafes. Broad Haven also has a primary school, youth hostel centre and a baptist church.

3.3 The population of The Havens at the 2011 Census was 1,175 with the overall Ward population of 1,536. The two settlements share similar characteristics with Newport, Pembrokeshire and its adjacent settlement, Parrog. In terms of population Newport and Parrog have 1,161 inhabitants, slightly less than Broad Haven and Little Haven. It is noted in the Preferred Strategy document that the population of Newport is estimated as 860.

3.4 It is noted that, in the Preferred Strategy document under Policy 3, Newport is identified as a Local Centre (Tier 3), whilst Broad Haven, (and separately Little Haven) under Policy 6, are categorised as Rural Centres (Tier 4).

3.5 There are therefore inconsistencies in the categorisation of settlements, particularly as some settlements which are listed within Tier 4 are small in comparison with Broad Haven, often with a very limited range of facilities. It is accepted that the categorisations are derived from the Wales Spatial Plan. However, that document, first published in 2004, is increasingly out of date and is due to be replaced by the National Development Framework. By the time the Replacement Plan goes to Examination, the WSP may be irrelevant as it will be superseded by an updated evidence base. There is no longer a 'Test of Soundness' which requires that a plan is compatible with the WSP.

3.6 For the above reasons, **Policy 6 is objected to on the grounds that Broad Haven is included as a Tier 4 settlement.** The settlement, either in its own right, or in combination with Little Haven as The Havens, should be identified as a Tier 3 settlement, and made the subject of a specific policy.

3.7 This would allow for a specific policy which would seek provision of an appropriate level of housing, including affordable housing, and to ensure the retention and enhancement of community facilities.

1569 Mark Newey, Welsh Government, Plans Branch 0 General

Thank you for consulting the Welsh Government regarding the Pembrokeshire Coast National Park Authority Local Development Plan (LDP) – 1st Review pre-deposit documents. It is essential the Authority is covered by an up-to-date LDP that will deliver the vision and key objectives and give certainty to local communities and investors.

Without prejudice to the Ministers discretion to intervene later in the process and to the independent examination, the Welsh Government is committed to helping Local Planning Authorities minimise the risk of submitting unsound documents by making appropriate comments at the earliest stages of document preparation. The Welsh Government looks for clear evidence that the tests of soundness (as set out in the 'LDP Manual') are addressed.

The Welsh Government is broadly supportive of the Preferred Strategy, which seeks to direct development to the most sustainable centres whilst supporting rural communities. In addition, we generally support the level of growth proposed in the plan, although this will need to be clearly informed by a range of growth options stemming from the issues your Authority is seeking to address.

Having considered all the submitted documents provided by Pembrokeshire Coast National Park Authority, our main concern relates to the candidate site selection process, which appears to identify future allocations based on their ability to deliver affordable homes alone against untested affordable housing targets. If this is the case, your Authority needs to robustly justify the Candidate Site selection process and explain how the proposed allocations have been assessed against general sustainability and viability criteria, which has subsequently informed the plans strategy. The integrity of this approach and how it could withstand changing circumstances as the plan moves forward, for example, changes in affordable housing viability, should be a key consideration to ensure a robust evidence base.

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; to maintain and enhance the resilience of ecosystems and the benefits they provide.

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 and it does not present a policy response to further the resilience of ecosystems. We are more than happy to meet and assist in appropriate policy development for the Deposit Plan.

Our representation also includes other concerns which are set out in detail 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 and/or strengthened going forward. Some key areas include:

- Spatial distribution
- Growth options and housing provision
- Affordable housing targets and site thresholds
- Agricultural land
- Minerals
- Renewable energy, and
- Green wedges.

We strongly advise these matters are addressed in order to maximise the potential of your LDP being considered 'sound' at the Deposit stage.

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.

If you would like to meet at an early date to discuss any matters arising from our formal response to your Preferred Strategy, then please contact me. You should document your response to our comments in your Consultation Report.

Further clarification on the Environment Act comment:

Background

The Environment (Wales) Act 2016 introduces in Part 1 the principle of the Sustainable Management of Natural Resources (SMNR). SMNR is about managing natural resources in a joined up way that delivers real outcomes for the environment, people, the economy and our communities. The aim of the legislation is to make the most of the opportunities that Wales' natural resources present while safeguarding and building the resilience of natural systems to continue to provide these benefits over the long term. Central to the Act is the need to adopt a new, more integrated approach to managing our natural resources in order to achieve long-term sustainability. The Act provides an iterative framework that ensures that managing our natural resources sustainably will be a core consideration in decision-making. This iterative framework is based around a Natural Resources Policy, prepared by Welsh Government that sets out the priorities, risks and opportunities for managing our natural resources sustainably (this was published in September). The Natural Resources Policy was informed by the State of Natural Resources report (prepared by NRW and published in September 2016). Finally, the iterative framework introduces Area Statements; NRW will produce a local evidence base, which helps to implement the priorities, risks and opportunities identified in the National Policy and sets out how NRW intends to address these.

Finally, the Act introduced a new biodiversity duty (Section 6 Duty) to help to reverse the decline and secure the long-term resilience of biodiversity in Wales. The Section 6 Duty is an enhanced biodiversity and resilience duty to replace the former NERC Duty (Natural Environment and Rural Communities Act, 2006, section 40 Duty).

Section 6 of the Act states,

"6 (1) A public authority must seek to maintain and enhance biodiversity in the exercise of functions in relation to Wales, and in so doing promote the resilience of ecosystems, so far as consistent with proper exercise of those functions."

Section 6 places a duty on public authorities, to seek to maintain and enhance biological diversity (referred to as biodiversity). All public bodies, statutory undertakers, Ministers of the

Crown and other public office holders are required to apply the duty when they are carrying out any functions in Wales, or in relation to Wales.

What Does the Iterative Framework of the Env Act and the Section 6 Duty Mean for LDPs?

As you know, PPW is currently being revised and restructured for consultation early in 2018, the comments below reflect the 'direction of travel' that (as Officials) we're keen to develop in PPW. These comments are therefore caveated; the messages below could be subject to change as PPW is further refined before the consultation draft is released next year. We do appreciate the difficult timing issues that this presents for your plan preparation, however, the 'asks' of the Environment Act are clear and there are specific implementation requirements for the planning system to consider.

The iterative framework (State of Natural Resources Report, Natural Resources Policy and Area Statements (when published)) should be considered and reflected in the Deposit Plan. Taken together this framework should help reinforce and strengthen the position of the identification of the special qualities of the National Park. Reflecting on some of the policy messages in this framework will help to underpin the special qualities of place approach that the LDP is rightly pursuing.

For the Section 6 Duty, in Planning terms, common functions will be determining planning applications and appeals, preparing development plans and taking enforcement action. Planning functions must be exercised in a way that aims to maintain and enhance biodiversity, and thus further the resilience of ecosystems.

LDPs therefore have a key role to play in helping to reverse the decline in biodiversity and increasing the resilience of ecosystems by ensuring that policy mechanisms are in place to protect against loss of biodiversity and secure enhancement.

We would be looking for policy approaches in the Deposit LDP:

- That protect designated sites and existing biodiversity assets from impacts which directly compromise the resilience of ecological networks and the components that underpin them (e.g. water, soil).
- That seek improvements to resilience by improving diversity, condition, extent and connectivity of ecological networks, through appropriate site selection, the provision of green infrastructure and creative design.
- That seek improvements in the connectivity between habitats and encouraging habitat creation and restoration, through mechanisms such as buffers, corridors and stepping stones.
- That seek to protect and enhance designated sites and existing biodiversity assets by reducing the impacts of development in wider social, economic, cultural and ecological terms by taking an integrated approach towards development. As well as reducing the direct impacts of development, such an approach will be based on seeking the multiple

benefits that can be derived, including those achieved through nature based solutions (like green infrastructure) as well as ensuring resource efficiency and health and well-being objectives as part of development.

Policies in the Deposit Plan should take a proactive approach towards facilitating the delivery of biodiversity and resilience outcomes. They should demonstrate that all reasonable steps have been taken to fulfil the requirements of the Section 6 Duty.

Further Clarification:

Natural Environment –The requirement in PPW (paragraph 5.4.5) is to identify international, national and local designations and it should be clear to which areas this protection would apply. Boundaries identified by bodies outside the Authority will not generally need to be shown on the proposals map but could usefully be contained on the constraints map or in SPG (with a link from the reasoned justification in policy). International and national designations (where applicable in the Park) will not generally be subject to change. For assistance on policy criteria affecting different levels of designations, please see the adopted Vale of Glamorgan LDP.

1569 Mark Newey, Welsh Government, Plans Branch 4E <u> </u> Growth Options and Housing Provision

Planning Policy Wales (paragraph 9.2.2) states that Authorities will need to have a clear understanding of the factors influencing housing requirements in their area over the plan period. The latest Welsh Government household projections and the Local Housing Market Assessment (LHMA) should form part of the plans evidence base together with other key issues the plan is seeking to address. For the Park, the Welsh Government 2013-based household projections, released March 2016, are the most recent.

The Preferred Strategy identifies two options for housing growth; Option 1 is understood to be the Welsh Government 2013-based principle household projections and Option 2 is a policy based on providing market housing to subsidise the provision of affordable housing. The options tested to inform the level of population and housing growth are unclear in their relationship to the projections and limited when considered against the range of issues the plan is seeking to address, such as population decline, levels of out-migration and an ageing population. The Deposit plan should ensure a range of options have been tested to robustly inform future levels of growth linked to key issues the plan is seeking to address rather than become a mathematical calculation based on past build rates only.

Preferred Option 2 is a continuation of policy in the adopted LDP and seeks to tackle the high level of affordable housing need in the National Park (LHMA, 2014). Option 2 will result in a requirement of 940 dwellings with a provision of 1100 units, which is approximately 500 units less than the adopted LDP. The housing requirement is predicated on past 10-year build rates (2005-2015) delivering an average of 60 units per annum (60 units p/a x 16 year plan period = 960 unit requirement). Whilst the Welsh Government does not object to the principle of this approach, the Authority has acknowledged that future build rates are likely to exceed past completions with 70 units per annum considered achievable in principle (LDP, paragraph

4.268). This increased build rate would raise the housing requirement by approximately 160 units to 1120 dwellings. The Authority should **clearly evidence the level of housing requirement in the Deposit plan, which is not only deliverable but also takes account of the key issues the plan is seeking to address, in particular maximising the delivery of affordable housing.**

1569 Mark Newey, Welsh Government, Plans Branch 4E _____ Delivery & Phasing

The Authority will need to demonstrate in the Deposit plan that all allocations and commitments are financially viable and deliverable over the plan period. We note the Authority's intention to prepare a Land Allocation Implementation Study (LDP, paragraph 4.299) to evidence the delivery of sites, key infrastructure requirements and associated costs and build on the work already undertaken to evidence delivery of Local Transport and other long term schemes (Sustainable Transport Paper, Tables 1 and 2). The study will also need to be accompanied by **an indication of key timings, phasing and funding mechanisms to ensure that all allocations and related infrastructure can be delivered over the plan period.**

The Scale and Location of Growth Background Paper (Appendix 2) highlights a number of sewerage and water capacity issues in Tier 3 and 4 Centres. The delivery of allocations in these Centres, which may require upgrades to the network, will need to be clearly evidenced. In this respect, the Authority should consider entering into a Statement of Common Ground (SoCG) with Welsh Water to address the capability of water and sewerage infrastructure to accommodate the level of growth proposed in the plan.

The Housing Background Paper (page 22) appears to imply that housing and mixed-use sites will be phased over the plan period to take account of infrastructure requirements and the absorption of development into existing settlements? The Authority should clarify this approach. National policy is clear that phasing should take the form of a broad indication of timescales rather than an arbitrary numerical limit on permissions on a precise order of release (PPW, paragraph 2.2.1). Any **rationale for potentially controlling the phasing of sites would need to be clearly justified**, particularly as the Authority has not maintained a five-year housing land supply over recent years.

The Authority's intention to prepare a housing trajectory for the Deposit plan will greatly assist all parties to understand the ability of sites to be delivered over the plan period. The trajectory should be supported by an analysis and understanding of lead-in times for larger sites, the inter-relationship between any such sites, potential constraints, costs, infrastructure requirements and funding streams, together with robust assumptions on windfall sites in order to **demonstrate a five-year housing land supply from adoption of the plan.**

**1569 Mark Newey, Welsh Government, Plans Branch 4B Policy 26 Policy 26
Inactive Mineral Sites:**

In the Deposit Plan, Policy 26 would benefit from the identification of inactive and dormant sites, together with a strategy to explain future restoration and proposals for after-use of the land. The Authority should also identify where future Prohibition Orders may be served in-line with national planning policy (PPW, paragraph 14.7.14).

In summary, the Deposit plan should:

- Clearly set out the broad strategy for mineral working over the plan period, providing narrative on the existing mineral workings within the national park;
- Safeguard mineral resources in line with national policy and the BGS Safeguarding Map of Wales to maintain consistency across boundaries with neighbouring Authorities;
- Include buffer zones around permitted and proposed mineral workings, supported by policy;
- Consider the inclusion of a suitable local minerals working policy to ensure the environmental, amenity and health impacts of any future applications which may come forward during the life of the plan are appropriately assessed;
- Set a clear strategy for dormant mineral sites and provide clarification on serving prohibition orders;
- Show areas of past, present or possible future coal workings on the proposals map and develop a supporting policy (as stated in the background paper);
- Encourage prudent use of natural resources and promote the use of recycled, secondary aggregates or waste materials to reduce primary resources extracted, and
- If applicable, demonstrate the rationale for employment sites and allocated housing within mineral safeguarding areas. The Authority should demonstrate the application of Policy 21 to housing and employment sites in safeguarding areas and evidence that prior extraction has been considered in-line with national planning policy (PPW, paragraph 14.2.1).

Further clarification: Policy 26 Inactive Mineral Sites - National policy states that “inactive sites with planning permission for future working which are considered unlikely to be reactivated for the foreseeable future should be identified in the development plan and should be the subject of a suitable strategy and associated policies to explain future proposals for the land” (PPW, 14.7.14). For example, the policy should identify and name the two inactive sites and state the current status of the sites (how long since they were last worked etc.) and whether they are likely to be re-activated in the future. If they are not likely to be re-activated (which we assume is the case given the presumption against minerals working in the national park) the plan should provide details on the likely use of the land over the plan period and what restoration (if any) is likely to take place, or whether the Authority is likely to serve a prohibition order on the site. This would provide certainty and clarity to the plan user, for example, we did not know what / where any inactive sites were located and their status. The Vale of Glamorgan has a detailed policy on dormant minerals sites which may be useful.

The Welsh Government notes the Authority's updated evidence 'Development of a Renewable Energy Assessment and Target Information', which takes account of the Welsh Government's Toolkit for Planners (2015). It will be for the Authority to build on this work going forward, explaining how the renewable energy policy approach has been developed in-line with PPW and the Toolkit taking into account all relevant issues and, where appropriate, making evidence based decisions where the toolkit facilitates this approach.

The Welsh Government considers the evidence base and policy approach would benefit from clarification/refinement in the following areas:

- Demonstrate **how the REA has been embedded in the candidate site process** and how renewable energy/low carbon opportunities have informed the scale and location of growth.
- The REA update assesses the opportunities and potential for renewable energy in the Park and draws conclusions on the potential contribution each renewable technology can make over the plan period. This work should be embedded in the LDP and delivery of the contribution should be included in the monitoring framework.
- **Policy 33 would benefit from some amendment and clarification in order to align with national policy, the evidence base, and ensure the plan will achieve what it intends to in respect of renewable energy.** In particular, clarification is required on the scale of renewable energy technology listed in Table 1. The size of micro to large scale technologies in the Park appears at odds with national policy (PPW, figure 12.2), which clearly defines Local Authority-wide scale as between 5MW and 25MW for onshore wind and between 5MW and 50MW for all other technologies. It may be appropriate for finer grain detail in this respect in light of local circumstances; however, in the first instance it should be clear how these local thresholds relate to those in PPW.
- Policy 33 contains no specific thresholds for development. It should do, and they should align to national policy (PPW 12.2) and the conclusions of the REA.

In Policy 33 the Authority should also consider whether specific technologies and their impacts may warrant explicit reference, for example, is the wider policy framework and supporting SPG sufficient in this respect?

Clarification from Welsh Government: Renewable Energy – Apologies, the reference to '12.2' should read 'Figure 12.2' as stated under bullet point 3. PPW and Figure 12.2 identify different scales of renewable energy as; strategic (over 50MW or over 25MW for wind), local authority-wide (5MW-50MW or 5-25MW for wind), sub-local authority (50kW – 5MW) and micro scale (<50kW). Policy 33 should be a criteria based policy that refers to these national scales/thresholds and state what type and scale of RE technology would/would not be suitable in the National Park, for example, your REA identifies that no strategic or local authority-wide

scale development would be suitable due to its landscape/visual impact in the NP. At the sub-local authority scale (50kW – 5MW) you could then incorporate the evidence from your REA and the scales/thresholds you have identified in paragraph 4.148 and include criteria against which to assess the different technologies.

Further clarification on this representation:

I have read your updated section and I have provided the following observations that you may wish to consider moving forward. Please note I have prepared these comments in the absence of reading your background evidence and REA as part of your Preferred Strategy consultation:

- As worded, we consider that Policy 33 would benefit from minor amendment and clarification to align with national policy, your evidence base and the issues the plan is seeking to address. For example, the detail in paragraph 4.178 relating to thresholds for individual technologies and the scale of renewable energy development appropriate in the Park (or not), could usefully be contained in Policy 33;
- New paragraph 4.183 refers to likely ‘contributions’ for renewable energy and carbon emissions set out in the REA. The target (or contribution) should be clear in Policy and included in the monitoring framework, and
- Clarity is required on the additional reference taken from Powys’ LDP to ‘have regard to the availability of alternative sites’. What does this mean in practice? Will it delay and/or prevent schemes coming forward? If the aforementioned points were undertaken to highlight opportunities for Sub-Local Authority scale development only in the Park, would this negate the need for the additional reference?

1631 Bluestone Resorts Ltd G Davies Vision and Objectives, National Park Portrait, Key Issues, Policy 15, Policy 35 Visitor Economy

Local Development Plan (Replacement Preferred Strategy)

Question 1b: Is there anything you feel we have not included that we should consider?
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The purpose of this Preferred Strategy is to set out the long term vision for the Pembrokeshire Coast National Park and the objectives and land use policies needed to deliver that vision.

The Well-being of Future Generations Act 2015 concerns the embedding of the principle of sustainable development into all of the work carried out by public bodies and places a requirement on all public bodies to set out how they will progress the 7 well-being goals set out in the Act.

To properly embed these goals and targets the vision of the Pembrokeshire Coast National Park needs to reflect the requirement to achieve the goals in its vision and objectives. To not do so is an omission.

The 7 goals of the Well-being of Future Generations Act need to be goals are not a checklist for compatibility of pre-existing plans.

The action a public body takes in carrying out sustainable development must include:

- a. setting and publishing objectives (“well-being objectives”) that are designed to maximise its contribution to achieving each of the well-being goals, and
- b. taking all reasonable steps (in exercising its functions) to meet those objectives.

In a changing strategic context it is important that the aims of the Pembrokeshire Coast National Park reflect current needs and the original aims of the Park are expanded.

The future landscapes programme identifies that; “these designations need to integrate with and take forward the aspirations of our new world-first legislative framework which emphasises the sustainable use of our natural resources as the bedrock of future prosperity and well-being.”

The Local Development Plan must deliver for the economy as well as the environment and this challenge must be at the heart of the strategy. The approach of “having regard to” fails the test of embedding and planning to deliver particularly against a prosperity goal.

Officer Response

2. The vision is of a desired state, it need not include references to the means of arrival. Nor need it include reference to the legislation although the desired state should be congruent with that if legislation. The Local Development Plan vision is the Park-specific expression of a range of policy aspirations.
3. The vision and objectives have been evaluated against the 7 Wellbeing of Future Generations goals.
4. Each paragraph of the Preferred Strategy vision contributes to a minimum of 3 of the goals. Please see the [Background Paper Vision and Objectives](#).
5. Each of the goals is delivered on by a minimum of 5 Local Development Plan objectives.
6. Park purposes are unchanged by recent legislation. Does the Plan not deliver for the economy?

7. The phrase having regard to is used in the Plan in relation to national planning policy in the Glossary of Terms and in relation to site licensing.

Question 1c: Is there anything we that you feel we should amend?

In the sections on the National Park Portrait it states “What has been retained through the above analysis are six key priority issues that need to be addressed by this Local Development Plan. These issues must be addressed within a context of needing to achieve National Park purposes which are:

- a) ‘to conserve and enhance the natural beauty, wildlife, and cultural heritage²¹ of the National Parks.’
- b) ‘to promote opportunities for the understanding and enjoyment of the special qualities [of the Parks] by the public.’

These are underpinned by the Sandford Principle which asserts the primacy of the first purpose over the second in cases of irreconcilable conflict. Reflecting that National Parks are living landscapes with a resident population, the Authority also has a duty in taking forward the Park purposes to: ‘foster the economic and social well-being of local communities, within the National Park....’ This duty should be fulfilled in the pursuit of National Park purposes.

The National Park Portrait is firmly rooted in the past with the old legislative purposes without adding the new ones. New legislation has given the park new duties and the Future Landscapes Review identified that there is scope to align better the designated landscapes with the sustainable management of natural resources as set out in the Environment (Wales) Act 2016.

This section should be amended to reflect the broader duties and not merely the establishing ones, emphasising the greater role the Pembrokeshire Coast National Park Authority has to play in future.

In the **Key Issues to address** section and **Vision** the same comment applies as above where no policies are put forward to increase employment around existing businesses nor economic growth or resilience. Adapting to climate change will require taking longer term views to avoiding potentially severe consequences to some villages such as Amroth or Saundersfoot and their role as communities and economic hubs.

The importance of getting the strategic duty right in terms of the 7 goals is emphasised by the **National Park Purposes and Duty**

“There is one overarching policy in the Plan which deals with National Park purposes and duty.

National Park purposes are set out in the 1995 Environment Act. It could be suggested that inserting a policy is merely restating legislation but the two purposes coupled with the duty are so fundamental to the work of the Park Authority it is important to place them at the centre of the Local Development Plan.”

The new legislative duties on public bodies in Wales need to be in the centre of this plan and not “also” “tag ons” to have regard to.

Officer Response

1. The purposes of National Parks remain unchanged at present. The role of the National Park Authority remains unchanged at present. Sensitivities regarding the evidence base for the Plan will continue to be [monitored](#) (link to Background Paper). The Plan includes policies on employment. See also previous response.

Policy 15 Landscape

Landscape Character assessments are very useful but experience has shown that there areas of common landscape character are not uniform and wildness and tranquillity are relative and not absolute.

Currently Landscape character 28 includes the following description:

“There is a great sense of tranquillity here, produced by the enclosed large water body, whether at high or low tide, and the feeling of being on a quiet backwater. “

The map of this area includes the A40 trunk road as its northern boundary. Clearly a more sophisticated relative tranquillity and wildness approach is needed.



D. Visitor Economy, Employment.

Policy 35

The strategy for visitors is to attract an optimal number, origin, type, duration of stay and spend of visitors all year round while ensuring that National Park environment continues to hold its attraction as a landscape of national and international importance.

The consultation goes on: “This is best achieved in land use terms by not adding substantively to the overall provision of visitor accommodation, as this could encourage further ‘peaking’ and cause damage to the National Park landscape and special qualities, both in terms of the impacts of the additional development and increased activity in some ‘hot spot’ locations”.

There is a lack of ambition here to grow Pembrokeshire’s tourism industry. Clearly the value of Pembrokeshire’s attraction and the qualities of the National Park must be maintained. However this section needs to reflect the potential of the Park to play its part in the Green Growth agenda and the sustainable management of natural resources.

The Designated Landscape review identified that the designated landscapes of Wales have a pivotal role to play in the future prosperity of Wales.

“National Parks and Areas of Outstanding Natural Beauty (AONBs) are acknowledged and cherished as important national assets. However, there is an agreed understanding both within and beyond designated landscapes that, with recent legislative changes, they can still deliver more.”

“Designated landscape management organisations need to further develop and refine their own understanding of local economic resilience and economic opportunities, and continue to collaborate with other economic development agencies, including local authorities. They should draw on their power to convene local bodies, businesses and groups in order to support and create opportunities for employment. There is the potential to deliver both economic and environmental gains if joint objectives are set alongside each other from the outset”

There is an opportunity to review this section of the plan to embrace Welsh Governments Review of Designated Landscapes and explore what may be possible rather than the inherent language of the current plan which is “presume against”.

Officer Response

1. The policy and justification are set out. National Park purposes and duty apply. Why target tourism and not then all other sectors? The green growth agenda is not defined. No specific examples of statutory requirements that the Authority are not complying with are set out. Is the policy framework not seeking the sustainable management of natural resources? Officers have sought advice from Welsh Government regarding the status of the Future Landscapes document and have been advised the planning framework in Planning Policy Wales is not programmed for change as a result. Its status is also unclear due to

the publication of the latest consultation on the Sustainable Management of Natural Resources.

Summary

We welcome the opportunity to share our views on the preferred strategy and would be interested to take forward collaboration on well being and resilience, particularly to further develop and refine understanding of local economic resilience and economic opportunities.

Ged Davies

12 July 2017

2616 Pembrokeshire Friends of the Earth Policy 33 Renewable Energy

1) The document should first make it clear that under Welsh planning law, outside Conservation Areas renewable energy schemes up to certain sizes/ratings do not require planning permission because they have been granted Permitted Development: at the very least, the relevant Welsh Government document / weblink should be referenced, and ideally a table of renewable energy permitted developments should be included in this LDP document.

2) The Policy statement commences with, *“Small scale renewable energy schemes will be considered favourably, subject to there being no over-riding environmental and amenity considerations.”*

Pembrokeshire Friends of the Earth has been advised of planning applications for small scale wind turbines on farmland that were opposed by the National Park Authority, despite those applications being supported by neighbours and their local communities; we understand that at least one turbine was granted permission on appeal to the Planning Inspectorate – after a lot of time, money, and effort had been expended by both the applicant and the PCNPA. Furthermore, farm-scale wind turbines of 15kw/20kw rating often disappear from the general public’s consciousness almost as soon as they are erected and set to work: they become an accepted part of the landscape. This suggests that in the past National Park planning officers have overestimated the environmental and amenity impacts of small wind turbines.

Accordingly, and further to our Point (1) above, we suggest that the wording quoted above should be revised as follows: *“Small scale renewable energy schemes not allowed under Permitted Development rights will be considered favourably, only being refused where there are exceptional environmental and amenity considerations.”*

3) a) The Park must always bear in mind, when evaluating environmental considerations of renewable energy proposals, that the local environmental impact, which is mostly visual within the immediate area, must be balanced against the global environmental benefits delivered: carbon-free electricity mitigating climate change and sea level rise, and no despoliation of overseas landscapes caused by fossil fuel extraction.

b) Regarding “amenity” at a regional level, all renewable energy schemes within the Park are highly economically beneficial to the landowners, to local businesses (installation and maintenance contracts), and to the county and to Wales by bringing in electricity sales revenue instead of causing a cash outflow, as is the case with fossil-fuel-generated electricity.

c) As far as a local community is concerned, undoubtedly their evaluation of the “amenity” of a wind or solar power development is affected by the perceived benefit it brings; i.e., local people are likely to be much more in favour of community wind turbines or solar farms that they themselves wish to develop or wind or solar projects which offer the local community a share of the scheme’s revenue.

The three points above must surely be reflected in any appraisal of renewable energy proposals conducted by the PCNPA; FOEP suggests that the wording of Policy 33 should be further amended to confirm this.

Officer Response

Point 1 – The reasoned justification for Policy 33 has been amended with reference to ‘where not covered by permitted development rights’ and a footnote referencing the relevant Statutory Instruments has been included.

Point 2 – The landscape visual impact of small scale wind turbines is considered on a case by case basis against the relevant national and local planning policy and Supplementary Planning Guidance, which provides detailed landscape capacity assessments for each area of the National Park. The current wording of the policy and Supplementary Planning Guidance has been regularly tested at appeal where appellants have disagreed with the Authority’s view in this regard and is considered to have performed well overall. No change is proposed to the policy wording.

Points 3a-c – the points made are noted and agreed in so far as the contribution a renewable energy development makes towards national targets does form a valid material consideration and that they can generate additional income to landowners, local communities (with respect to community projects) and businesses. Each case is determined on its merits and the level of evidence available. The existing wording of the policy is not considered to prohibit the inclusion of the above benefits of renewable energy developments as part of the determination of applications. No change is proposed.

Wind Instead of adding a footnote to make clear that the turbine sizes referred to are measured to blade tip, insert the words 'Blade Tip Height' within the table itself, after the word 'Wind'. This is to make it more easily understood .

Biomass: insert the word 'Facility' within the table after the word 'Biomass'. To many people Biomass refers to the growing crop rather than the installation for processing it. Paragraph 4.173 refers to 'Biomass Plants' and as this is also misleading, the word 'Plants' could be changed to 'Facilities'

Paragraph 4.173 states:

'it also includes a landscape sensitivity assessment for field scale solar photovoltaic development and wind turbines for each landscape character area within the National Park'

In PCNPA Renewable Energy SPG the entry for LC7 Angle reads as follows:

- a) The majority of this LCA is unsuitable for large or medium scale turbines. There may, however, be limited opportunity for a single or a small cluster of medium or large (under 100m to blade tip) scale turbines on land close to existing oil refinery chimneys to provide a new point of focus as long as they are sited sensitively following the guidance below.**
- b) There may be limited opportunity for single small scale turbines only on land close to the existing developed areas and built features, as long as they are sited sensitively following the guidance below.*
- c) Site turbines away from the undeveloped coastal edge to protect coastal views, including to St Ann's Head.**
- d) Site well away from the planned Medieval village of Angle.**
- e) Ensure traditional agricultural field patterns with hedges and hedgebanks are not affected.*
- f) Protect valued habitats and species, including Angle Bay for its overwintering bird species.**
- g) The National Park Authority should ensure that any wind turbine development**
- h) located within this LCA does not sacrifice the essential integrity, coherence and character of the landscape or the special qualities of the National Park⁷².**

CPRW Comments

We don't understand the reference to '*Under 100m to blade tip*' in the above text about Angle peninsula. Where is the assessment from which this figure is derived? The NP objected to the proposed 100m turbines outside its boundary and located near to the Valero Refinery. .

During the Public Inquiry into the Rhoscrowther Wind turbines (5 x 100m) the applicants demonstrated that any wind turbines located within the National Park, close to the Valero Oil

Refinery stacks as suggested the National Park text above would be impracticable, as there was insufficient room and as well they would fall foul of the constraints included in the text above.

We ask therefore that you reassess the LC sensitivity and potential for wind turbine development in the Angle Peninsula with a view to removing the statement suggesting there is room for a cluster of up to 100m high turbines near the Valero refinery as it has proved to be unviable within the National Park.

No Buffer Zone in Policy 33 to protect residents from undue noise and severe visual impact. No distance between groups of turbines proposed to restrict cumulative impact.

CPRW Comments

The Wales Toolkit- 'Planning for Renewable and Low Carbon Energy 2015', written for Planners, specifies a 500m buffer zone between residents and wind turbines for noise purposes. This is not contained in your SPG on Renewable Energy nor in this Policy. In fact the SPG does not mention residents at all, nor does it refer to tourism which is a major industry in the National Park. The SPG has been produced as if the National Park was empty of people and their businesses. Tourist enterprises need the Buffer zone as much as residents. The Buffer zone is acknowledged in other LDPs

The toolkit Buffer is calculated on level ground. We believe the 500m should be extended when turbine blades are at a level AOD with residential properties, or where turbines are sited at a higher level AOD than nearby properties.

The Wales Toolkit for planners suggests a distance of 7km between clusters of turbines.

Officer Response

1. Wind – agree. **Amendment done.**
2. Biomass – agree. **Amendment done.**
3. Renewable Energy SPG – This Supplementary Planning Guidance did not form part of the Preferred Strategy consultation. However the reference to '*Under 100m to blade tip*' refers to the 'Large' scale category as defined within the Supplementary Planning Guidance. This advice refers to land only within the National Park. Whilst evidence may have been provided to demonstrate this location as being impracticable, this is case sensitive and would not necessarily relate to other development schemes.
4. Buffer Zone – The 500m buffer zone referred to in the Toolkit relates to large scale installations or a turbine with an output of 2MW. Reference No. 41 within the Toolkit states that this was the figure used for the assessment of Strategic Search Areas contained in Technical Advice Note 8. Similarly the reference to 7km distance between turbines is in relation to large scale unconstrained wind

resources. There are no Strategic Search Areas identified within the National Park and this scale of turbine development would not be considered appropriate within the National Park landscape or its outliers. For small scale turbine development, defined as turbines under 25m to blade tip in the supporting table to Policy 33 within the Local Development Plan Preferred Strategy, each case will be determined on its merits, against the relevant ETSU Guidance, with regard to noise impact upon neighbouring properties. It is not considered appropriate to apply a blanket buffer zone distance in this respect as it could prohibit suitable small scale schemes being developed.

3511 H Gardiner, Tenby Civic Society 4 Tenby

We feel Tenby's special character and contribution to the Coast Park is richer than set out in **section 4**. The language used in the draft is clearly more positive for other settlements, which do not have the visitor capacity or Tenby's rich variety of strengths.

We suggest below amendments to sections **4.27 to 4.29** to reflect Tenby's special character. New wording in *italics and underlined*.

4.27 Background

Tenby, *superbly* located on *a peninsular of* the south Pembrokeshire coast has *a special identity in the Park as its only historic walled town and resort, with stunning cliff-top panoramas over fine popular beaches to Carmarthen Bay and Caldey Island. Tenby's special character includes important mediaeval, Georgian and Victorian architecture, the almost complete Town Walls, a Conservation Area and 350 Listed Buildings.*

It has a *picturesque* working harbour *with* a constant bustle *which* visitors often spend time watching. *Tenby's crescent harbour is an iconic Welsh image much used to popularise Wales, its coast and the Coast Park*

Tenby hosts a wide variety of community facilities *and voluntary organisations* catering for all ages and tastes, *including local and visitor events*. It has rail and bus services and it is on the National Cycle Network.

Tenby's visitor experience has been improved with peak season pedestrianisation of the Walled Town and Tenby has become an international centre for major triathlon-style sporting events with support infrastructure.

Tenby is *the* leading *town centre inside* the Park and serves *residents business and visitors* in a rural hinterland *in and* outside the National Park.

4.28 Issues for Tenby

Para 4 on

There are a number of traffic and pedestrian management issues giving concern, particularly congestion and parking during the summer months.

There are amenity concerns about take-away and late night opening and mixed uses in Tenby Town Centre.

There is a lack of all year round employment opportunities and a need to promote more internet based business.

There is room for improvement in rail and bus services, especially on Sundays and for evening buses every day.

4.29 Tenby by 2031

Sentence 2

The Walls, historic buildings, panoramic views, beaches and cliff ecosystems are conserved to maintain the special character of the town.

Last sentence

There is an active promotion of Tenby as a residential location including those who live in Tenby but work elsewhere or on the internet.

ADD

Local, national and international events are promoted and encouraged.

Policies

b) to permit proposals for small scale and internet based employment development to meet the needs of the local area.

c) to protect and enhance the town's facilities and town shopping centre which serve the needs of the local area and visitors.

Add

h) to promote a diversity and infrastructure of sporting and other events throughout the seasons.

3683 Matthew Baker Caravans Ltd (Geraint John Planning) 4 Policy 3 Newport

Policy 3 - Newport Local Centre (Tier 3)

As stated within para 4.21 of the 'Preferred Strategy' document, towns and villages in the National Park have lower order roles and are included as either Tier 2 or Tier 3 Centres. The differing Tiers are set out as follows:

a) Tier 2...Centres have a service centre, employment and tourism function.

b) Tier 3...Centres are principally local centres with some being significant tourism centres. As stated within para 4.31 of the 'Preferred Strategy' document, Newport has a good range of facilities serving the town and the hinterland, and is classified as a 'district shopping centre' by Policy 49. As specified in para 4.32, there are several key issues for Newport which need to be addressed, and these are as follows:

"Difficulties for Newport include high house prices and a shortage of land for developing affordable housing. A high number of holiday and second homes is of concern as is an ageing population. The use of the Welsh language is declining. A general upgrading of community facilities is also considered necessary as is the developing of Newport as an attraction for tourism. Additional employment opportunities would be welcomed. Traffic volumes and turning movements continue to

impact on the town despite measures being introduced in the past. Further improvements to traffic management would be welcomed including improvements to pedestrian safety and parking. The area around Newport Parrog, Newport Sands and the Nyfer Estuary are at risk from flooding but it should not impair Newport's potential to act as a Local Centre – see also Policy 34." [GJP Emphasis]

In light of these issues raised, it is considered that the designation of Newport as a 'Tier 2 - Local Service and Tourism Centre' would be a more appropriate designation in order to overcome the issues identified above. This designation would ensure that Newport is allocated appropriately scaled development to sustain and enhance the tourism offer and become a quality tourism destination. This designation would therefore allow Newport to adhere with 'Priority D – Visitor Economy, employment' and 'Policy 35 – Visitor Economy' of the preferred strategy to be met and complied with. Moreover, in doing so, this would assist in overcoming the issues identified in para 4.32 that Newport needs to overcome through this plan period.

This is further reiterated within 'Policy 20 – Scale of Growth (Strategy Policy)' where point g. states:

"For retail it is proposed to encourage the sympathetic regeneration of Tenby, Saundersfoot, St Davids and Newport so that they can continue to remain attractive places to live and visit; provide a valuable role in meeting the needs of local communities and visitors, and attract niche retail opportunities." [GJP Emphasis]

As stated above, Policy 20 seeks to encourage the sympathetic regeneration of Tenby, Saundersfoot, St Davids and Newport so that they can continue to be attractive places to live and visit. However, it is considered that Policy 20 has not taken into account the differing hierarchical designations imposed upon those 4 centres, as Tenby is the only one designated as a 'Local Service and Tourist Centre', and it therefore raises the question how can the scale of growth between the identified centres be 'sympathetic' when not all of the centres benefit from the same designation – 'Local Service and Tourist Centres – Tier 2'.

It is therefore proposed that Policies 3, 4 and 5 are amended to designate the following towns to 'Local Service and Tourist Centres – Tier 2':

- St Davids;
- Newport; and

- Saundersfoot.

This would therefore allow for sympathetic levels of growth to be attributed to each of these towns, and it is considered that the amended designations would comply with the aspirations of Policy 20.

Conclusion

Policy 3 - Newport Local Centre (Tier 3)

It is considered that the designation of Newport as a 'Local Service and Tourist Centre', would be a more appropriate and sympathetic designation that would contribute to achieve the aspirations for Newport as set out in the preferred strategy.

Given the detailed nature of these representations our client would be happy to discuss any aspect of the submission made and credentials of the land when your Authority (and the appointed Inspector in turn) comes to evaluate matters. Appearance at the Public Examination in due course is also considered necessary and beneficial.

**3468 Ms Mary Sinclair, Campaign for Protection of Rural Wales 0 General
Yes omission needs to be addressed**

No Policy on conserving the Best and Most Versatile Agricultural Land

CPRW Comments

The Plan has no specific policy for conserving Best and Most Versatile (BMV) Agricultural Land and I cannot see where it is referred to at all. The Wales Government Agricultural and Countryside Team in Llandrindod Wells are well advanced in their task of upgrading the Provisional Agricultural Land Classification data, and subdividing grade 3 for the first time into its constituent grades, 3a (BMV land) and 3b. We have been supplied with their draft Predictive maps which reveal an increase in the amount of BMV Land in this County. The old Provisional Maps are now out dated and in any case failed to divide grade 3 land, and the new Predictive Maps should be used.

CPRW objected to the location of some development sites at the deposit stage of the PCNPA LDP because they were so obviously concreting over BMV land which would then be lost to food production.

Even though the protection of BMV land is National Policy we feel that it is failing to be implemented at LPA level which has a Duty to conserve BMV land. This land needs the greater priority and consideration that a specific Policy would give. We would like to see BMV land conserved for future generations with a strong presumption against developing over it, even near towns where development might be under consideration.

Local production of food should be a priority. Agricultural land use is largely outside planning control, but conservation of the resource is not and should not be. We ask that you put in a

Policy to conserve the Best and Most Versatile Land present within the National Park, using the updated maps being produced at this moment in Llandrindod Wells.

Contact for Llandrindod Wells Office : Email address withheld.

4545 D Thomas Pembrokeshire County Council 0 General

Consideration of giving greater weight to the interdependence of the PCNPA area and the rest of Pembrokeshire and beyond should be considered. This interaction and interdependence is crucial to the economy of the Park area and the livelihoods of their residents and businesses. Movement and accessibility between it's area and areas outside the Park for leisure, work, training, education, shopping, personal business, health reasons etc. needs to be stressed and given recognition in the policies.

Recognition of this interdependence should aid the PCNPA in taking forward it's core duties and responsibilities as long as this is done in a sustainable way.

Greater emphasis therefore needs to be given to sustainable transport measures and the partnerships necessary to deliver them. Few things can be achieved in the transport field with the PCNPA acting alone.

Developing sustainable transport initiatives in Partnership with other organizations (given the PCNPA do not have direct highway or transport responsibilities) and addressing sustainable trips to activities (often essential activities) etc. beyond the Park should be given greater recognition.

Winning hearts and minds in developing the above and discouraging use of the private car in appropriate cases; Recognition that transport trips are more complex and rarely involve a complete door to door journey, and therefore complete modal change in that sense is often not the objective but modal change for a particular segment or segments of a journey to more sustainable means is (e.g. using park & ride and park & share); Using Travel Planning and Smarter Choices techniques along with appropriate policies and designation of land-use (where appropriate) for public transport termini and interchanges, park & ride, park and share, pedestrian, traffic management, minor highway improvements and road safety measures should be incorporated in relevant objectives, policies and proposals to aid the delivery of the aforementioned sustainable transport measures.

Officer Response

1. The National Park Authority's only statutory function is as a planning authority. It is fully recognised that other local authority functions – such as highways, housing, social services etc are undertaken for the whole of Pembrokeshire by Pembrokeshire County Council. There are many examples of joint working between the two authorities – including through the Pembrokeshire Greenways Partnership. The relevant strategies, plans and proposals prepared by the various departments of the Council are taken into consideration during the Plan

preparation and included in the series of background papers which provide the evidence base for the Plan. The relevant Council Officers have been involved in preparing that evidence base.

2. The Preferred Strategy is based on reducing the need to travel – particularly by private car – which is also wholly in line with national planning policy. New development is guided towards those towns and villages with good public transport, walking and cycling opportunities for links to employment, education, services and facilities. The strategy was developed in full consultation with Pembrokeshire County Council. No specific proposals for public transport proposals have been submitted by the Council, as candidate sites but the relevant generic policies of the Plan allow for their consideration, should they come forward during the Plan period. Many of the techniques outlined above for encouraging more sustainable means of travel are beyond the remit of land-use planning and will require input from others and working alongside the highway authority – which is equally the highway authority for all areas inside the National Park as well as the rest of Pembrokeshire.
3. Further clarification of these comments from the Highway Authority were sought and it was agreed that further to the amendments being suggested as a result of other comments made, no further amendments to the document are sought.

4582 Swangate Ltd (Geraint John Planning) Policy 5 St Davids

1487 Pembrokeshire Housing (Geraint John Planning) Policy 5 St Davids
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Policy 5 - St Davids Local Centre (Tier 3)

Whilst our client understands the justification within the 'Preferred Strategy' of allocating St Davids as a Tier 3 'Local Centre', it is considered that allocating St Davids as a Tier 2 'Tier 2 - Local Service and Tourism Centre' is more appropriate. The justification for this amendment is set out below.

As stated within para 4.21 of the 'Preferred Strategy' document, towns and villages in the National Park have lower order roles and are included as either Tier 2 or Tier 3 Centres. The differing Tiers are set out as follows:

- a) Tier 2...Centres have a service centre, employment and tourism function.
- b) Tier 3...Centres are principally local centres with some being significant tourism centres.

As specified in para 4.41, there are several key issues for St Davids which need to be addressed, and these are as follows:

"Neighbouring St Justinians and Whitesands Bay are also major tourist attractions which bring visitors to the area and add to the traffic management issues in and around St Davids. The existing Celtic Coaster service plays a part in resolving these issues. Affordable housing provision is necessary and the impact of second and holiday homes is a concern" [GJP emphasis]

As specified in para 4.41, there are several key aims for St Davids which are to be met, and these are as follows:

"The future for St Davids by the end of the Local Development Plan period will see it having had new housing developed in the town including an element of affordable housing. Significant cultural investment has taken place with the Cathedral Cloisters project and the Landscape Gallery Oriol y Parc. Community and retail facilities are adequate to serve the needs of the local community. Traffic management

measures have mitigated the adverse impacts of through traffic and traffic movements within the town and have addressed the traffic management issues at St Justinians. The City's role as an attractive historic centre is protected and enhanced and the hotel and guest house accommodation is adequate to serve the needs of visitors" [GJP emphasis]

In light of these issues raised, it is considered that the designation of St Davids as a 'Tier 2 - Local Service and Tourism Centre' would be a more appropriate designation in order to overcome the issues identified above, and act as a 'centre' with a tourism function, as stated within para 4.21 which sets out the role and function of a tier 2 centre. This designation would ensure that St Davids is allocated appropriately scaled development to sustain and enhance the tourism offer and become a quality tourism destination. This designation would therefore allow St Davids to adhere with 'Priority D – Visitor Economy, employment' and 'Policy 35 – Visitor Economy' of the preferred strategy to be met and complied with. Moreover, in doing so, this would assist in overcoming the issues identified in para 4.40 that St Davids needs to overcome through this plan period.

The Role of Tourism

Paragraph 4.38 of the Preferred Strategy clearly advocates and identifies the importance of St Davids has in terms of tourism for the National Park:

"Today, St Davids and its peninsula forms one of the most important tourism resources in the National Park. The Wales Spatial Plan Framework acknowledges the important role St Davids plays as a tourist destination." [GJP emphasis]

This echoes the appropriateness of designating St Davids as a 'Tier 2 - Local Service and Tourism Centre' as this would conform with the Wales Spatial Plan section 18 – 'Pembrokeshire – The Haven' which identifies St Davids as a 'tourism focus'.

The 'Faith Tourism Action Plan for Wales' identifies that visitors to Wales are increasingly interested in visiting historical attractions, and for overseas visitors, visiting historical sites is the most common reason for visiting Wales. Page 3 of the 'Faith and Tourism Action Plan for Wales' states that:

"Places of Worship are amongst the most visited visitor attractions in Wales and in 2011, St David's Cathedral was the 7th most popular free visitor attraction in Wales." [GJP Emphasis]

Whilst the Visit Wales Attraction Survey 2015 illustrates that there was a 7% increase in visits from 2014 – 2015, from 257,000 visits in 2014 to 275,700 visits in 2015. There has been a general increase in visits since 2011 where 262,000 visits took place.

As stated above, the designation of St Davids as a 'Tier 2 - Local Service and Tourism Centre' is considered to be fully appropriate and sympathetic to the role St Davids plays a tourist destination and given the unique role of faith tourism plays in Wales, it is considered that this justifies this change.

Scale of Growth

The scale of growth proposed for specified areas of Pembrokeshire are set out in Policy 20 of the LDP – Scale of Growth (Strategy Policy), where there are several criteria identified which set out the aims and objectives of the Policy. For example, point G. states:

"For retail, it is proposed to encourage the sympathetic regeneration of Tenby, Saundersfoot, St Davids and Newport so that they can continue to remain attractive places to live and visit; provide a valuable role in meeting the needs of local communities and visitors, and attract niche retail opportunities." [GJP Emphasis]

In light of the significant emphasis outlined within the previous section of the importance St Davids is in terms of a national and regional tourist destination, for any regeneration to be sympathetic to this role, a Tier 2 designation would therefore be more appropriate for St Davids.

Summary

It is therefore proposed that Policy 5 is amended to designate St Davids to 'Local Service and Tourist Centres – Tier 2'.

This would therefore allow for sympathetic levels of growth to be attributed to each of these towns, and it is considered that the amended designations would comply with the aspirations of Policy 20.

4576 Mr Bowen (Asbri Planning) Policy 6 Broad Haven

Reference will be made, both in this, and the ensuing section, to the Settlements Capacity Study for BroadHaven, which forms part of the adopted Local Development Plan evidence base. The settlement of Broad Haven is described as follows:

'A medium-sized nucleated settlement with an open coastal aspect to the west onto the broad sweep of St.Bride's Bay. Rocky cliffs frame the views out from the broad stretch of sandy beach. Recent residential development has extended outwards from the small, mainly Victorian core up the lower slopes of the rising landform to the east. The development still lies well below the horizon and the landform provides visual containment. Important 'green wedges break up the built form along stream valleys in the north and south. The caravan park in the north is particularly well screened from view. A seaside village very popular with visitors attracted by the beach.'

3.2 In combination with Little Haven, collectively known as 'The Havens', Broad Haven has all the characteristics of a small seaside town, with a distinct centre focused on the junction of the B4341 and Marine Road. This includes a Londis supermarket (incorporating a post office), a public house (The Galleon), a sports shop, beach shop and 2 café's/takeaways. Other commercial units are located further along the seafront. Little Haven also accommodates several pubs and cafes. Broadhaven also has a primary school, youth hostel centre and a baptist church.

3.3 The population of The Havens at the 2011 Census was 1,175 with the overall Ward population of 1,536. The two settlements share similar characteristics with Newport, Pembrokeshire and its adjacent settlement, Parrog. In terms of population Newport and Parrog have 1,161 inhabitants, slightly less than Broad Haven and Little Haven. It is noted in the Preferred Strategy document that the population of Newport is estimated as 860.

3.4 It is noted that, in the Preferred Strategy document under Policy 3, Newport is identified as a Local Centre (Tier 3), whilst Broad Haven, (and separately Little Haven) under Policy 6, are categorised as Rural Centres (Tier 4).

3.5 There are therefore inconsistencies in the categorisation of settlements, particularly as some settlements which are listed within Tier 4 are small in comparison with Broad Haven, often with a very limited range of facilities. It is accepted that the categorisations are derived from the Wales Spatial Plan. However, that document, first published in 2004, is increasingly out of date and is due to be replaced by the National Development Framework. By the time the Replacement Plan goes to Examination, the WSP may be irrelevant as it will be superseded by an updated evidence base. There is no longer a 'Test of Soundness' which requires that a plan is compatible with the WSP.

3.6 For the above reasons, **Policy 6 is objected to on the grounds that Broad Haven is included as a Tier 4 settlement.** The settlement, either in its own right, or in combination with Little Haven as The Havens, should be identified as a Tier 3 settlement, and made the subject of a specific policy.

3.7 This would allow for a specific policy which would seek provision of an appropriate level of housing, including affordable housing, and to ensure the retention and enhancement of community facilities.

1487 Pembrokeshire Housing

**(Geraint John Planning) • Affordable Housing - Policy 45: Affordable Housing;
(and Affordable Housing provision in St Davids).**

Affordable Housing - Policy 45

There are no affordable housing figures / projections provided in this preferred strategy. these figures will be added at a deposit stage (owing to no residential allocations being provided to date within the preferred strategy consultation document).

Although, as set out within Policy 45

:

"The affordable housing target for the Plan period is an estimated 250 affordable housing units. "

The estimated target of 250 affordable housing units are generally supported by our client. although a greater number of units would be supported. The Local Housing Market Assessment. as referred to on page 111 of the Preferred Strategy identifies that:

"total affordable housing need extrapolated over a 15 year Plan period would be 370 (per annum need) multiplied by 15 which would total 5,550 affordable housing units. The need is greater than any historic dwelling completion rate for the National Park. "

The Local Housing Market Assessment illustrates a higher need for affordable housing in the National Park. as such it is suggested that the Policy 45 is amended to reflect the greater need for affordable housing provision in the National Park.

Affordable Housing in St Davids

As noted above, St Davids is designated as a Local Centre (tier 3) and one of the key land use priorities will be:

"to provide for and or permit housing to facilitate the delivery of the affordable housing needs of the local area."

In terms of affordable provision rates in St Davids. the preferred strategy states:

'The rate of development in the City has been constrained in recent times due to difficulties in bringing forward the Glasfryn Lane allocation, a substantial allocation in size. Smaller sites provided for in the current Plan have not come forward primarily as a result of a lack of land owner interest. The Glasfryn Lane site is now being unlocked with the benefit of road improvements and the work of the local Community Land Trust. Housing delivery here could therefore be slightly higher than past completion rates would suggest (2005 to 2015 figures show a completion rate of 5 per annum).'"

Owing to the potential of this site being unlocked. and through the outcome of the ongoing pre-application discussions our client and other parties have had on this site, this allocation will see the delivery of a significant number of affordable houses for St Davids

As set out in Policy 45, and in respect of 'Housing Submarket Areas', St Davids is identified as a 'Local Centre where the percentage of affordable dwellings will be 30% provision of affordable houses, and this threshold is supported by our client.