

**Pembrokeshire Coast National Park Authority**

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**Pembrokeshire Coast National Park**

**Local Development Plan (Replacement)**

**Preferred Strategy & Deposit Plan & Focussed Changes**

Consultation Report

March 2019

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## Introduction

1. Chapter 1 sets out a summary of the publicity carried out for the Preferred Strategy consultation and the Deposit Local Development Plan.
2. Chapter 2 advises regarding the approach the Authority took regarding engagement in the preparation of the Preferred Strategy and the Deposit Local Development Plan.
3. Chapter 3 sets out the main issues raised in response to the consultations and the Authority's response. A separate schedule has also been prepared with individual comments responded to the formal consultations – Preferred Strategy<sup>1</sup> Deposit Plan<sup>2</sup> and Focussed Changes.<sup>3</sup>
4. Chapter 4 provides information on how late representations were dealt with both at Preferred Strategy Stage and at Deposit Stage. There were no late submissions on the Focussed Changes consultation but two submissions were categorized as invalid. More information is provided in Chapter4.
5. Chapter 5 provides a conversion chart for policy numbering. It shows what the policy number was in the Preferred Strategy and what it is in the Deposit Local Development Plan.
6. Chapter 6 advises what the next steps are.

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<sup>1</sup> <http://www.pembrokeshirecoast.wales/default.asp?PID=836>

<sup>2</sup> <http://www.pembrokeshirecoast.wales/default.asp?PID=876>

<sup>3</sup> [Pembrokeshire Coast National Park - Consultation Report](#)

## 1. Publicity

7. **Preferred Strategy:** The Preferred Strategy was published for consultation for an eight week period ending 21<sup>st</sup> of July 2017. A public notice was placed in the Pembrokeshire Herald and a press release sent out. Officers were also invited to attend two community meetings to assist with understanding the consultation process.
8. The Preferred Strategy and accompanying documentation was placed on the Authority's website and all those on the Authority's mailing list were notified of the consultation.
9. A period of 2 weeks was added to the six week formal consultations. The table below provides a summary of consultation and engagement undertaken prior to placing the Plan on Deposit.
10. **Deposit Plan:** The Deposit Plan was published for consultation for an eight week period beginning 6th April 2018. A public notice was placed in the Pembrokeshire Herald and a press release sent out. Officers were invited to attend two community meetings to assist with the understanding the consultation process.
11. **Focussed Changes:** Focussed Changes were published for consultation for an eight week period ending on the 15<sup>th</sup> February 2019. A public notice was placed in the Pembrokeshire Herald on the 30<sup>th</sup> November 2019.
12. The table below has four columns. Column 1 provides a plan stage reference, Column 2 describes the steps to be taken, Column 3 sets out a target dates for completion of work and Column 4 advises if the target has been met.

Stage (Replacement Plan)	Steps	Completion Target Date & Publications/ Submissions	Target met?
<a href="#">Review Report</a>	- Consider conclusions of Annual Monitoring Reports and updated evidence base and stakeholder	- NPA Approval for informal consultation March 2016 - 8 week consultation April/May	<input checked="" type="checkbox"/>

<b>Stage (Replacement Plan)</b>	<b>Steps</b>	<b>Completion Target Date &amp; Publications/ Submissions</b>	<b>Target met?</b>
	<ul style="list-style-type: none"> <li>engagement.</li> <li>- Prepare Report and seek Welsh Government informal view.</li> <li>- Publish background papers and evidence</li> <li>- Informal Consultation</li> <li>- NPA Approval</li> <li>- Submit to Welsh Government</li> </ul>	<ul style="list-style-type: none"> <li>- Workshops with Town &amp; Community Councils April 2016</li> <li>- Report of consultations/finalise NPA June/July 2016</li> <li>- Publish Review Report</li> </ul>	
<p><b><u>The Delivery Agreement (Regulations 9 and 10<sup>4</sup>) &amp; (Regulations 2(3)<sup>5</sup></u></b></p>	<ul style="list-style-type: none"> <li>- Review the 1<sup>st</sup> Plan's Delivery Agreement</li> <li>- Informal consultation exercise.</li> <li>- NPA Approval</li> <li>- Submit to Welsh Government for agreement - Following agreement, publicise and notify all the specific consultation bodies, and such of the general consultation bodies as the LPA considers appropriate, that the Delivery Agreement has been revised. (Regulations 9(4A)&amp;(5), &amp; 10(2))</li> </ul>	<ul style="list-style-type: none"> <li>- Member workshop March 2016 and invite to comment</li> <li>- NPA approval for informal consultation March 2016</li> <li>- 8 week engagement and consultation April//May 2016</li> <li>- Workshops with Town &amp; Community Councils April 2016</li> <li>- Report of consultations/ Finalise NPA June/July 2016</li> <li>- Submit Delivery Agreement to Welsh Government for agreement June/July 2016.</li> <li>- Publication of the Delivery Agreement for the Replacement Plan once agreed</li> </ul>	<input checked="" type="checkbox"/>
<p><b><u>Sustainability</u></b></p>	<ul style="list-style-type: none"> <li>- Review baseline</li> </ul>	<ul style="list-style-type: none"> <li>- Member workshop</li> </ul>	<input checked="" type="checkbox"/>

<sup>4</sup> Town & Country Planning (Local Development Plan) (Wales) Regulations 2005

<sup>5</sup> Town & Country Planning (Local Development Plan) (Wales) (Amendment) Regulations 2015



<b>Stage (Replacement Plan)</b>	<b>Steps</b>	<b>Completion Target Date &amp; Publications/ Submissions</b>	<b>Target met?</b>
	<p>recommend changes or improvements.</p> <ul style="list-style-type: none"> <li>- Equalities Impact Assessment Screening Report</li> </ul>	<ul style="list-style-type: none"> <li>- Candidate site selection/Areas of potential change engagement with <a href="#">Town &amp; Community Councils</a> January/February 2017</li> <li>- Member workshops to February 2017</li> <li>- Prepare Draft Preferred Strategy documents for NPA Approval for consultation March 2017</li> </ul>	<p><input checked="" type="checkbox"/></p> <p><input checked="" type="checkbox"/></p> <p><input checked="" type="checkbox"/><sup>9</sup></p>
<b>Pre-Deposit Consultation (Regulations 15, 16 and 16a<sup>10</sup>)</b>	<ul style="list-style-type: none"> <li>- Publish the Preferred Strategy Proposals documents including the Candidate Site Register, Review Report, Background Papers, Equalities Impact Assessment and the Sustainability Appraisal</li> <li>- Statutory Consultation</li> <li>- Consider Responses</li> </ul>	<ul style="list-style-type: none"> <li>- Preferred Strategy Proposals documents (see across) &amp;</li> <li>- Sustainability Appraisal Statutory consultation (6 weeks) April/May 2017</li> <li>- Publication of the Initial Consultation Report as soon as reasonably practicable</li> </ul>	<p><input checked="" type="checkbox"/><sup>11</sup></p>

<sup>9</sup> Consultation documents were approved at the National Park Authority meeting on the 17<sup>th</sup> May 2017. Closing date for comment was the 21<sup>st</sup> July 2017.

<sup>10</sup> Regulation 16A added under the Town and Country Planning (Local Development Plan) (Wales) (Amendment) Regulations 2015

<sup>11</sup> Consultation documents were approved at the National Park Authority meeting on the 17<sup>th</sup> May 2017. Closing date for comment was the 21<sup>st</sup> of July 2017

<b>Stage (Replacement Plan)</b>	<b>Steps</b>	<b>Completion Target Date &amp; Publications/ Submissions</b>	<b>Target met?</b>
	<ul style="list-style-type: none"> <li>- Engage with stakeholders if required in light of new evidence</li> <li>- Member workshops</li> <li>- Prepare Initial Consultation Report</li> <li>- Agree Preferred Option/Strategy and Sustainability Appraisal etc.</li> </ul>		
<b>Deposit Regulations 17, 18 and 19)</b>	<ul style="list-style-type: none"> <li>- Review more detailed policies for the Deposit Plan not included at Preferred Strategy stage.</li> <li>- Review Sustainability Appraisal of Deposit Local Development Plan policies.</li> <li>- Review and update 1<sup>st</sup> Plan Habitats Regulations Assessment Screening</li> <li>- Review and update 1<sup>st</sup> Plan Habitats Regulations Assessment</li> <li>- Review and update the Preferred Strategy Equalities Impact Assessment</li> <li>- Engage with relevant stakeholders</li> <li>- Member workshops</li> <li>- Statutory consultation</li> </ul>	<p>Finalise Deposit Plan documents for approval for consultation March 2018</p> <p>Statutory consultation (6 weeks) April/May 2018</p>	<p style="text-align: center;"><input checked="" type="checkbox"/></p> <p style="text-align: center;">Approved National Park Authority 28th March 2018 Closing date 1st June 2018</p>

<b>Stage (Replacement Plan)</b>	<b>Steps</b>	<b>Completion Target Date &amp; Publications/ Submissions</b>	<b>Target met?</b>
<b>Submission to Welsh Government for Examination (Regulation 22)</b>	<ul style="list-style-type: none"> <li>- Evaluate the representations submitted</li> <li>- Reconsider Delivery Agreement timetable; submit definitive timings for remaining stages</li> <li>- Submit Documentation</li> </ul>	Member Workshop Agree Submission Documentation National Park Authority December 2018 <sup>12</sup>	<b>Approval for Submission NPA Nov 2018 Submission Letter 7<sup>th</sup> December 2018</b>
<b>Focussed Changes consultation</b>	<ul style="list-style-type: none"> <li>- Public Notice</li> <li>- Letter to consultees.</li> <li>- Evaluate the representations submitted</li> <li>- Submit response by the 22<sup>nd</sup> February 2019.</li> </ul>	Closing date 15 <sup>th</sup> February 2019	<input checked="" type="checkbox"/>

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<sup>12</sup> 2 years and 6 months to submission. The Inspectorate historically committed to providing an Inspector's Report by 1 year from submission.

## 2. Bodies Engaged

13. The tables below provide a commentary against each of the Delivery Agreement's expectations for engagement.
14. Regarding the overall principles of engagement set out in the Delivery Agreement the table below sets out the expectations and what the outcomes have been.
15. The table below has two columns. Column 1 sets out the Delivery Agreement expectations and Column 2 describes the outcomes.

<b>Delivery Agreement expectations</b>	<b>Outcomes</b>
We will seek to make the process, strategy and policy proposals and decision making process as accessible and easily understood as possible.	<a href="#">Feedback</a> from the Town & Community Council Workshops has been positive. Feedback from Members on the workshops undertaken has been positive in terms of opportunities provided to comment. The Authority has produced easy read versions of the <a href="#">Delivery Agreement</a> and <a href="#">Preferred Strategy</a> .
We will seek to make the best use of existing information and networks to avoid duplication and consultation fatigue.	Please refer to <a href="#">background papers</a> . Existing networks such as Pembrokeshire Sustainable Agriculture Network, the Public Service Board and Pembrokeshire Business Panel have been engaged in the process which has proved extremely helpful in terms of resourcing the Plan's preparation and in terms of reaching participants.
We are committed to ensuring that we communicate and consult with all sections of the community using a range of appropriate approaches to maximise effectiveness.	The consultation complied with the Delivery Agreement which sought to engage all sections in an appropriate way. See also 'Seldom Heard Groups' table further down in this chapter.
We are committed to ensuring that feedback is reported, and is an integral part of our decision making processes.	Representations and feedback from those engaged were reported to Member workshops and the National Park Authority (March 2018) and post the National Park Authority meeting (November 2018).

<b>Delivery Agreement expectations</b>	<b>Outcomes</b>
	Feedback on how responses were dealt with were provided following the Authority Meeting.
The inputs and outputs of all our engagement measures will be public information.	National Park Authority Meeting agendas have been made publicly available on the Authority's website. <a href="#">Reports of Consultations</a> from key stages of the Plan are available on the web.
We will aim to be realistic about how far we can build consensus recognising that this is more likely when developing options rather than when writing the detailed policies of the Plans; when aiming to agree on what the main issues are rather than how to respond; and when agreeing what needs to be developed rather than where it is developed.	There are some issues arising where representors have opposing views. The Authority will need to make a judgement on the most appropriate way forward based on the conclusions of the evidence, the various appraisals and the application soundness tests.
We will aim to outline clearly where there are opportunities for local discretion and where there is a need to respect national policy and statutory designations.	Papers (in particular the <a href="#">Alternative Options &amp; Appraisal Background Paper (May 2017)</a> ) along with advice through engagement, the text of the draft replacement Plan and the Authority's responses to submissions provide a clear indication of where national planning policy is relevant and the significance of this.

16. In terms of engagement the tables below again set out Delivery Agreement expectations and the outcomes achieved.

## **General Public Involvement**

This can be any member of the public in Pembrokeshire and beyond. Individuals, businesses, organisations and groups can become involved by commenting at the key stages in the process. These will be, on the draft Review Report and its supporting documentation, draft Delivery Agreement, the Pre-Deposit Consultation Stage, Deposit Plan and at the Examination.

The Authority has no statutory requirement to consult the general public on the Review Report or Delivery Agreement, however in the interests of early and

continued engagement, it is considered important to do so.

In order to capture the maximum publicity to interested members of the public, (who are not on the direct mailing group explained below) there will be publicity on the National Park Authority's website on progress made and when representations can be made.

**Role** – The general public help the Authority develop detailed local knowledge of specific areas within the National Park. Individuals with detailed knowledge and experience of certain topics relevant for the Local Development Plan can serve as a key source of information for the Authority. The public will also act as a sounding board for how policy recommendations, site allocations and other detailed proposals will be received and the reasons for public support or objection.

**Outcomes:** The response received to the Preferred Strategy consultation has resulted in a number of commentators (many new) providing comment on a wide range of issues in the Plan. Additional comment from new commentators at Deposit stage.

## Direct Mailing Group

### Delivery Agreement expectations

Any individual, organisation, or group can be added to the National Park Authority's Direct Mailing List so that they can be automatically kept informed at all subsequent stages of the process. All those falling within consultee groups below are included on the mailing list.

To be kept directly informed of progress and opportunities to comment the public can email [devplans@pembrokeshirecoast.org.uk](mailto:devplans@pembrokeshirecoast.org.uk) giving contact details or telephone 01646 624 800 and ask to be put through to Park Direction. Our contact with you will be by direct mailing (or emailing, if you prefer) of details on consultations taking place or newsletters on progress made to date.

All those who submit representations during the statutory consultation periods will be added to the Direct Mailing List.

**Outcomes:** All those listed in the general mailing list database were forwarded a letter or email advising of the availability of the Preferred Strategy and Deposit Plan consultation .

## Seldom Heard Groups

### Delivery Agreement expectations

These are the groups that traditionally have not taken part to any great extent in preparing Plans and extra efforts will be required to encourage these people or

groups to be involved. This will be achieved by using already established forums, wherever possible.

It is recognised that some who are seldom heard may not have any associations with existing forums. We will continue to look for opportunities to reach as many facets of our community as possible subject to the amount of time and resources that can be reasonably dedicated to this.

The National Park Authority will target, in particular, the following seldom heard groups.

- Voluntary and youth organisations operating in Pembrokeshire - through liaising directly with Pembrokeshire Association of Voluntary Services.
- Gypsy Traveller Community – through liaising with the Pembrokeshire County Council's Gypsy Traveller Accommodation Assessment Group including attending meetings when appropriate.
- Farmers – through liaising directly with Pembrokeshire Sustainable Agriculture Network (PSAN) Steering Group including attending meetings when appropriate.

**Role** – Those who are engaged will be provided with an opportunity to voice the aspirations, requirements or concerns for those groups of people who do not traditionally engage with the Local Development Plan process. Active engagement from these groups will help the Authority consider the impacts of its proposals upon society as a whole.

**Outcomes:** Letters of consultation were also sent to organisations listed as 'Seldom Heard Groups' in the Delivery Agreement.

The Authority has also used existing fora to engage prior to the formal consultation as set out across.

The Gypsy Traveller Accommodation Assessment Group has been provided with drafts of the Local Development Plan Policy 46 Gypsy and Traveller Sites for comment during pre-deposit participation. Extracts from the Equalities Impact Assessment were also consulted upon. The Authority has also been part of the group which prepared the Gypsy and Traveller Assessment.

Officers have attended and presented at Pembrokeshire Sustainable Agricultural Network and shared draft policies for comment during the Pre-Deposit participation.

Officers have liaised with the Pembrokeshire Association of Voluntary Services and it was agreed that emailing the group via the 'Direct Mailing Group' was sufficient for their purposes.

## Community and Town Councils

17. The tables below set out the Delivery Agreement expectation and the Outcomes.

### Delivery Agreement expectations

The Authority will seek to engage directly with Community and Town Councils at appropriate stages. This will include holding two sets of workshops:

- The first to raise awareness of Local Development Plan review focussing on the draft Review Report and draft Delivery Agreement and the site selection process.
- The second set will focus on discussion of the areas of change included in the Local Development Plan Preferred Strategy and the selection of sites that fit with the Preferred Strategy prior to Pre – Deposit Consultation.

The Authority intends to utilise the networking capabilities of Town and Community Councils to disseminate information throughout the National Park communities and to encourage engagement in their respective areas.

**Role** – Town and Community Councils and their Councillors can provide a central source of information for their local communities, they can help to raise awareness of the revision process and relay local views and opinions back to the Authority.

**Outcomes:** The [workshops](#) have been completed and feedback has been positive. The Workshops were facilitated by Planning Aid Wales.

Some additional meetings were also attended.

It is difficult to assess the success of awareness raising via the Community and Town Councils. Officers are aware of this role being undertaken in certain communities which has been very helpful.

## ‘Specific Consultation Bodies’ and ‘UK Government Departments’

### Delivery Agreement expectations

These consultees (Groups B2 and B3 within the Local Development Plan Manual 2015) comprise those bodies with specific functions that apply within the National Park, for example Dwr Cymru as the local water undertaker. The Authority also needs to consult UK Government Departments where aspects of the plan appear to affect their interests.

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

An appearance at the Examination Hearings may also be invited by the Inspector even if the statutory consultee had not raised an objection or wished to appear at Inquiry.

Role – consultees in this group will be able to provide detailed, professional advice on the Replacement Plan proposals, identify potential conflicts with their respective duties, the suitability and deliverability of sites for development, unforeseen conflicts with other legislation and so on.

**Outcomes:** Many of these bodies are key stakeholders and were contacted or met with to provide input on the drafting of the replacement Local Development Plan Preferred Strategy and Deposit Local Development Plan. Advice also influenced the drafting of the site assessments for the Candidate Sites Register and the assessment of new or amended sites.

## General Consultation Bodies and Other Consultees

### Delivery Agreement expectations

'General Consultation Bodies' include voluntary bodies whose activities benefit the National Park, those which represent the interests of different racial, religious, ethnic, national or disabled groups in the National Park, as well as those which represent the interests of persons carrying on business and those which represent the interests of Welsh culture. This group for example includes National Farmers Union of Wales, Wales Pensioners etc.

'Other Consultees' are those which do not necessarily fall within the above categories listed for general consultation bodies, but still have an interest in the National Park which may be affected by the Local Development Plan. This group for example includes the National Trust, British Geological Survey, Pembrokeshire Coastal Forum etc.

**Outcomes:** These included members of 'Seldom Heard Groups' and 'Key Stakeholders' for which comment is provided above and below. Some organisations such as the Home Builders Federation have been provided drafts of policies and reports in advance of the pre-deposit consultation.

## Key Stakeholders

### Delivery Agreement expectations

For the replacement Local Development Plan, given that it is anticipated that the strategy will predominantly remain intact, it is intended that individual liaison including meetings will be set up with relevant stakeholders to discuss areas of change in advance of formal

consultation. These stakeholders include:

- Neighbouring authorities
- Welsh Water
- Natural Resources Wales
- Welsh Government
- Pembrokeshire Business Panel
- Public Service Board
- Pembrokeshire Sustainable Agriculture Group
- Affordable Housing Group for Pembrokeshire
- Pembrokeshire Community Energy Network
- Pembrokeshire Coastal Forum
- Home Builders Federation
- Destination Pembrokeshire Partnership

Stakeholder's details are also entered on the direct mailing list.

**Outcomes:** This standard has been met. Many of these bodies were contacted or met with to provide input on the drafting of the replacement Local Development Plan Preferred Strategy. A more limited engagement was undertaken for the Deposit Local Development Plan to help refine the policy approach. Advice also influenced the drafting of the site assessments for the Candidate Sites Register and the assessment of new or amended sites.

## **Developers and Agents and those proposing sites for development**

### **Delivery Agreement expectations**

Anyone with an interest in land who considers it would be appropriate for development can provide details to the Park Direction Service during the Pre-Deposit engagement Candidate Site stage. A Candidate Site submission form will be placed on our website: [www.pembrokeshirecoast.org.uk](http://www.pembrokeshirecoast.org.uk) along with guidance for completion.

These details will be entered into a Candidate Site Register. The Candidate Site Register will be made public alongside the Local Development Plan Preferred Strategy consultation.

Any site submitted prior to the publication of the Pre-Deposit Consultation of the Plan will be assessed by the Authority against criteria for site selection. The criteria for site selection will be prepared at the pre-deposit participation stage. A list of sites on the register that would be compatible with the Authority's Preferred Strategy will be published for comment.

Respondent's details will also be entered on the direct mailing list.

**Outcomes:** This standard was met. The closing date was for the receipt of Candidate Sites was November 25<sup>th</sup> 2016.

[Candidate Site Submission webpage](#)

In terms of outcome over 100 sites are included on the Candidate Site Register.

This standard has been met.

[Pembrokeshire Coast National Park - Candidate Site Register](#)

[Following the Preferred Strategy Consultation \(ended 21st of July 2017\) the Candidate Site Register was updated for the Deposit Plan and also a New and Amended Sites Assessment was also published.](#)

Following the Deposit Plan consultation an additional New and Amended Sites Assessment has also been published.

<http://www.pembrokeshirecoast.wales/default.asp?PID=876>

### 3. Main Issues

#### Preferred Strategy

##### Question 1 Preferred Strategy

18. A total of 247 comments were received from 41 representors.
19. The main issues raised during the Pre-Deposit consultation and responses made are listed below. The issues are grouped under 'General' and then by Preferred Strategy Chapter.
20. The tables below has four columns. Column 1 provides topic reference, Column 2 a Plan specific reference such as a Policy number, Column 3 sets out what the issue was that was raised and Column 4 sets out the Authority response.

#### General

<b>Topic</b>	<b>Plan Reference Preferred Strategy</b>	<b>Issue</b>	<b>Response</b>
<b>Mineral Safeguarding Zones</b>	Proposals Map & Constraints Maps	Ensure that the zones are shown.	Yes they will be shown on the Proposals Map.
<b>Planning decisions</b>	General	Is the Authority consistent in its decision making?	Annual monitoring would flag up such issues arising. No substantive issues have arisen.
<b>Climate Change</b>	Policy 34, 34A, 34B, 34C.	Support for the approach taken by the Authority	Noted
<b>Engagement</b>	General	Support for the approach the Authority has taken with early engagement.	Noted

<b>Topic</b>	<b>Plan Reference Preferred Strategy</b>	<b>Issue</b>	<b>Response</b>
<b>Density of housing developments</b>	General	Are there enough safeguards regarding the need to assess the character of the area?	The policy approach has been strengthened and a new policy inserted in the Plan – Policy 45A. <b>Amendment done.</b>
<b>Delivery of affordable housing</b>	Housing	Should market housing be used to cross subsidise the delivery of affordable housing?	In order to increase the supply of affordable housing this is the primary focus of national planning policy.
<b>Meeting all the demands</b>	General	Where will demand go if it cannot be met in the National Park?	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.
<b>Support for the strategy</b>	General	Support in general but policy and site/location specific issues raised with potential sites for development.	Noted.
<b>Pembrokeshire</b>	Transport	Could more be done to emphasise the interdependence between the National Park and the rest of Pembrokeshire?	Further clarification was sought on this comment. Following discussion, the Highway Authority are content that the relevant plans and strategies have been taken into account (see Background Papers) and are not seeking any changes to the Preferred Strategy.

<b>Topic</b>	<b>Plan Reference Preferred Strategy</b>	<b>Issue</b>	<b>Response</b>
<b>Special Qualities</b>		Support for the improved wording to policies' which refer to the special qualities.	Noted.
<b>Agricultural Land</b>	Omission	Include a policy on protecting the best and most versatile land. Ensure the candidate site process has regard to protecting the best and most versatile land.	Planning Policy Wales Edition 9 November 2016 at 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 however be included in the reasoned justification to Policy 7 Countryside. <b>Amendment done.</b> The Authority has also considered the implications of this national policy for the selection of sites and in applying the policies of the Plan.
<b>Environment Act (Wales) 2016</b>	General	Improvement of ecosystems resilience not covered sufficiently in the Plan.	Amendments done following feedback from Welsh Government - <b>amendments done.</b>
<b>Neighbouring Authorities</b>	General	Ensure evidence is provided of collaborative working.	Noted.

<b>Topic</b>	<b>Plan Reference Preferred Strategy</b>	<b>Issue</b>	<b>Response</b>
<b>Supplementary Planning Guidance</b>	General	Outline the timing of when such guidance will be prepared. Preparation of key guidance expected alongside the Deposit Local Development Plan.	A timetable has been included in the Monitoring chapter of the Local Development Plan following discussion with Pembrokeshire County Council - <b>amendments done</b> .
<b>Target driven development</b>	General	Developments should be needs driven rather than target driven.	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 consideration of the sites' compatibility with the spatial hierarchy and an assessment of the suitability of the sites for development and their impact on the surrounding area.

## Introduction

<b>Topic</b>	<b>Plan Reference Preferred Strategy</b>	<b>Issue</b>	<b>Response</b>
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<b>Topic</b>	<b>Plan Reference Preferred Strategy</b>	<b>Issue</b>	<b>Response</b>
<b>Well-being of Future Generations Act</b>	General	Ensure compatibility is achieved.	Noted.
<b>Constraints Map</b>	Paragraph 1.27	Minerals Safeguarding areas are not included in the list of constraints to be included on the constraints map.	In accordance with the Local Development Plan Manual minerals safeguarding areas will be shown on the Proposals Map at Deposit stage.
<b>Constraints Map</b>	Paragraph 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.	Suggestion noted. However, the process of designation is outside the Local Development Plan. 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.

## 2 Where we are now – National Park Portrait

<b>Topic</b>	<b>Plan Reference Preferred Strategy</b>	<b>Issue</b>	<b>Response</b>
<b>Where we are now introductory text</b>	2.3 – 2.4	This section should be amended to reflect the broader duties (as set out in new legislation) and not merely the establishing ones,	The purposes and role of the National Park Authority remain unchanged at present.

<b>Topic</b>	<b>Plan Reference Preferred Strategy</b>	<b>Issue</b>	<b>Response</b>
		emphasising the greater role the Pembrokeshire Coast National Park Authority has to play in future.	
<b>Where we are now</b>	Key Issues to address	No policies are put forward to increase employment around existing businesses nor economic growth or resilience.	The Plan includes policies on employment.
<b>Where we are now</b>	Key Issues to address	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.	Sensitivities regarding the evidence base for the Plan will continue to be monitored.

### 3 Where we want to be – Vision and Objectives

<b>Topic</b>	<b>Plan Reference Preferred Strategy</b>	<b>Issue</b>	<b>Response</b>
<b>Flooding</b>	Key outcome 8	Consider re-wording, as this sentence doesn't seem to make sense.	Agree. Recommend deletion of words 'which would be'. <b>Amendment done.</b>
<b>Flooding</b>	Key outcome 8	Amend 'vulnerable' to 'high vulnerable' as per TAN15 definitions	Agree. Recommend that Key Outcome 8 is amended by adding the word 'highly' before

<b>Topic</b>	<b>Plan Reference Preferred Strategy</b>	<b>Issue</b>	<b>Response</b>
			'vulnerable'. <b>Amendment done.</b>
<b>Employment</b>	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.
<b>Community Facilities</b>	Key outcome 16	Suggest taking out 'have been avoided' and replace with 'were successfully discouraged at pre-application stage'.	Agree amendment suggested. <b>Amendment done.</b>
<b>Employment</b>	Employment Objective	Define "sustainable local economy"	What the Local Development Plan can contribute to a sustainable local economy is amplified through the Plan's vision, strategy and policies.
<b>Vision and objectives</b>	General	The requirement to achieve the well-being goals should be reflected in the vision and objectives.	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 legislation.
<b>Housing</b>	3.2	The Vision states that the National Park's population will not be able to increase significantly. Who meets the shortfall for housing provision?	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 level of affordable housing need

<b>Topic</b>	<b>Plan Reference Preferred Strategy</b>	<b>Issue</b>	<b>Response</b>
			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 over time.
<b>Transport</b>	3.4	Generally, public transport in Pembrokeshire seems to be quite expensive, rather than affordable.	It is acknowledged that the reduction of budgets and recent closures have impacted on public transport provision in the County. However, this is the 'Vision' section of the plan and is 'where we want to be'.
<b>Transport</b>	3.4	Add "footway" to list of modes of transport.	Agree with the inclusion of the word 'footway' within the sentence. <b>Amendment done.</b>
<b>Flooding</b>	3.5	'Highly' vulnerable developments should be directed away from areas prone to flooding, less vulnerable types of development may be acceptable (as per TAN15).	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.
<b>Culture and Heritage</b>	3.6	No mention of 'distinct culture'.	The special qualities of the National Park referred to in the first paragraph of the vision includes cultural heritage – see Policy 8.
<b>Sandford Principle</b>	3.9	Repetition of paragraph 2.4.	Agree. Amend to avoid repetition. <b>Amendment done.</b>

## 4 How we get there up to 4A Special Qualities

<b>Topic</b>	<b>Plan Reference Preferred Strategy</b>	<b>Issue</b>	<b>Response</b>
<b>Spatial Strategy</b>	Policies 2 to 7	<p>Supported in principle subject to:</p> <ul style="list-style-type: none"> <li>- Some Rural Centres have no accessibility other than private car. Can this be justified through national planning policy?</li> <li>- Why is the Authority not prioritising rural enterprise proposals or affordable housing provision in infill and rounding off opportunities.</li> </ul>	<p>Policy 6 Rural Centres has been edited to respond to comments made.</p> <p>Policy 7 has also been amended to seek to prioritise the delivery of affordable housing. Evidence for need for rural enterprise dwellings is not available. <b>Amendment done.</b></p>
<b>Sewage Disposal at Tenby</b>	Paragraph 4.28	Update to advise there is capacity.	Agree. <b>Amendment done.</b>
<b>St Justinians St Davids</b>	St Davids	Consider the need for toilets and the issues regarding traffic management.	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

<b>Topic</b>	<b>Plan Reference Preferred Strategy</b>	<b>Issue</b>	<b>Response</b>
			congestion in the City Centre.
<b>Principal Residence Policy needed.</b>	Newport	Why is there not such a policy approach when it has been introduced in Cornwall?	There are several issues with this as a policy option. These include compatibility with national planning policy, practicalities of implementation and whether other policy options would achieve better outcomes.
<b>Tourist accommodation and visitor facilities</b>	Policy 2 Tenby	Include a priority to support and encourage development relating to tourist accommodation and visitor facilities.	The designation of Centres as set out in the Local Development Plan reflects the existing size of the Centres and their roles. The designations also reflect their size relative to other Centres in the Spatial Plan area. The issues for each Centre dictates the level of growth envisaged. The suggestion that a more substantive growth in the tourism offer is not seen as the way forward for Tenby and the other Centres. Reference to 'visitors' and cross references to relevant policies have been included. <b>Amendment done.</b>
<b>Older Persons Housing</b>	Policy 3 Newport	Be more proactive regarding provision.	Many of the issues raised are outside the remit of the planning authority and some would need changes to national planning policy. Those issues that can be addressed are. The Authority is willing to contribute to wider initiatives.

<b>Topic</b>	<b>Plan Reference Preferred Strategy</b>	<b>Issue</b>	<b>Response</b>
<b>Centres designation</b>	St Davids Newport and Saundersfoot	Designate as Tier 2 'Local Service and Tourist Centres.'	<p>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 dictates 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.</p> <p>Reference to visitors and cross references to relevant policies have been included. <b>Amendment done.</b></p>
<b>Broad Haven</b>	Policy 6	Include under Policy 5 as a Tier 3 Centre either in its own right or with Little Haven.	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 2. The Scale and Location of Growth Paper provides the evidence.
<b>Mynachlogddu</b>	Policy 6	Please include as it includes the facilities needed to qualify.	<p>Mynachlogddu has been included.</p> <p><b>Amendment done.</b></p>
<b>Carew, Crymych, Hill Mountain and Llanychaer</b>	Policy 6	Include as split Centres.	Crymych lies higher up the spatial hierarchy and commentary is provided just before the section on Rural Centres. Carew has been included. Hill Mountain consists of discrete areas of

<b>Topic</b>	<b>Plan Reference Preferred Strategy</b>	<b>Issue</b>	<b>Response</b>
			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.
<b>Nolton Haven and Porthgain</b>	Policy 6	Include these settlements.	Both have been included. <b>Amendments done.</b>
<b>Tourism development in the countryside</b>	Policy 7	Include a land use priority 'to support and encourage development relating to tourist accommodation and visitor facilities.'	The current wording of the Policy in relation to visitor facilities is considered appropriate.
<b>Locations with no public transport</b>	Policy 7a) infill and rounding off.	The provision of affordable housing should be proposed in accessible locations. Could the approach taken by Pembrokeshire County Council be used?	An amendment is proposed which would seek to prioritise affordable housing provision in infill and rounding off opportunities. <b>Amendment done.</b>
<b>Tourism Accommodation and Visitor facilities</b>	Policy 6 Rural Centres	Include as a land use priority: to support and encourage development relating to tourist accommodation and visitor facilities.	The level of cross referencing to the relevant policies is considered appropriate.

<b>Topic</b>	<b>Plan Reference Preferred Strategy</b>	<b>Issue</b>	<b>Response</b>
<b>Tenby</b>	Policy 2	Tenby's special character and contribution to the National Park is richer than set out in Section 4.	Agree. <b>Amendments done.</b>
<b>Spatial Strategy</b>	Public transport	Public transport provision in Pembrokeshire is under pressure and subsidies reduced.	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. 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. Focusing development in these Centres will also help to sustain services going forward.
<b>Spatial Strategy</b>	Options listed.	Why include the 'old' Joint Unitary Development Plan spatial strategy as an option?	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.
<b>Visitor numbers</b>	Section 4 Centres commentary	Include reference to visitor numbers.	Given the assumptions that would need to be made to come up with a figure here such an exercise would be misleading.

<b>Topic</b>	<b>Plan Reference Preferred Strategy</b>	<b>Issue</b>	<b>Response</b>
<b>Protection of Hotels</b>	4.28 and 4.29 (Policy 36)	Has the application of this policy resulted in vacant properties?	The approach has not resulted in properties becoming redundant. The approach is one of making sure opportunities to retain the hotel use are explored before an alternative use is considered.
<b>Housing</b>	4.3	Where will any shortfall in housing be addressed? Will Pembrokeshire County Council be required to address it?	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.
<b>Saundersfoot</b>	4.35	Include additional references regarding the future of Saundersfoot and flooding.	Agree. <b>Amendment done.</b>
<b>Neighbouring Authorities</b>	4.6	Has the Authority adequately addressed the implications for neighbouring authorities of its housing proposals.	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.

## 4 A Special Qualities

<b>Topic</b>	<b>Plan Reference Preferred Strategy</b>	<b>Issue</b>	<b>Response</b>
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<b>Topic</b>	<b>Plan Reference Preferred Strategy</b>	<b>Issue</b>	<b>Response</b>
<b>Lighting</b>	Policy 9	Qualify the term 'adverse effect' by adding the term 'significant'.	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. <b>Amendment done.</b>
<b>Welsh Language</b>	Policy 12	Clarify where Policy 12 applies. Issue focusses on pockets of Welsh language usage as referred to in the reasoned justification. Should you use the same percentage as Pembrokeshire uses?	A map will be included to identify the area where Policy 12 will apply. Following further assessment, it appears there are no smaller pockets of high concentrations of Welsh language speakers. The threshold used to define the area has been lowered to 19.2% which is the Pembrokeshire average. <b>Text amendment done.</b>
<b>Welsh Language</b>	Policy 12	What form will a Welsh Language Impact Assessment take?	The form and scope of a language impact assessment will depend on the type of development being proposed. In the planned system the need for such assessments should be rare. The Authority will need to consider approaches elsewhere when deciding its own approach.
<b>Neighbouring Planning Authorities</b>	4.96	Should you be able to use the Plan to comment on neighbouring planning applications?	The current approach has worked well in practice providing a clear and transparent context primarily for considering this

<b>Topic</b>	<b>Plan Reference Preferred Strategy</b>	<b>Issue</b>	<b>Response</b>
			Authority's response to wind turbine proposals coming forward in the Council's jurisdiction.
<b>Natural Environment</b>	Policy 10	Clarify the application of this policy in relation to different designations.	A policy approach similar to that used by the Vale of Glamorgan's adopted Local Development Plan has been inserted in the Plan. <b>Amendment done.</b>
<b>Natural Environment</b>	Policy 10 and 11	Qualify these policies by inserting the word 'significant' before harm.	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. <b>Amendment done.</b>
<b>National Park Special Qualities</b>	Policy 15	Include reference to mitigation opportunities for negative impacts.	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. <b>Amendment done.</b>
<b>National Park Special Qualities</b>	Policy 8	Does the policy recognise the less tranquil areas of the National Park?	The diversity of experience of the qualities is wide and varied within the National Park. The qualities as drafted and supporting landscape character guidance is intended to

<b>Topic</b>	<b>Plan Reference Preferred Strategy</b>	<b>Issue</b>	<b>Response</b>
			portray this.
<b>Green Wedges</b>	Policy 16	Will the designation of Green Wedges inhibit housing development.	A Green Wedge review has been undertaken in accordance with national planning policy and some amendments made.
<b>Open Space</b>	Policy 16	Address open space requirements in proposed housing allocations.	Noted.

#### **4 B Major Development, the potential for growth**

<b>Topic</b>	<b>Plan Reference Preferred Strategy</b>	<b>Issue</b>	<b>Response</b>
<b>Major Development</b>	4.113	Pleased that the document refers to the national policy tests for minerals proposals	Support noted.
<b>Nationally Significant Infrastructure Projects</b>	4.114-4.116	For these developments a full resource assessment should be required to identify raw materials and minerals resources impact.	The guidance governing Nationally Significant Infrastructure Projects is prepared by Westminster. This matter should be addressed by UK government's guidance or by the consenting authority.
<b>Nationally Significant Infrastructure Projects and Developments</b>	4.114-4.119	More is said about Nationally Significant Infrastructure Projects than Developments of National Significance, however the latter	Less detail is needed in the second category as there is more detail on what a Local Impact Report is in the first category.

<b>Topic</b>	<b>Plan Reference Preferred Strategy</b>	<b>Issue</b>	<b>Response</b>
<b>of National Significance</b>		seem to be the more common in Pembrokeshire.	
<b>Scale of Growth</b>	4.126	Omit last sentence – where is the evidence? Do those in housing need appreciate this approach?	<b>Amendment done.</b>
<b>Scale of Growth</b>	4.128 (a)	Latest population forecasts suggest a decline in population will only be after 2026 in an all Pembrokeshire context.	Both the 2014 (latest) and 2013 population projections for Pembrokeshire Coast National Park show a decline from the base year.
<b>Scale of Growth</b>	4.128 (d)	The Landscape and Capacity Study for Camping and Caravanning reports limited or very limited capacity, whereas criterion d only reports very limited opportunities.	Agree. Amend paragraph 4.128 (d) by inserting the words ‘limited or’ before very limited. <b>Amendment done.</b>
<b>Scale of Growth</b>	4.128 (h)	Town Centre Regeneration Plans could be mentioned.	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.
<b>Scale of Growth</b>	Policy 20	Criterion (f) – mention coastal roll back as elaborated in Policy 34 c?	Criterion f of Policy 20 relates the strategy for camping and caravanning proposals generally. The specific issue of coastal roll-back involving such sites would be considered in the context of Policy 34.

<b>Topic</b>	<b>Plan Reference Preferred Strategy</b>	<b>Issue</b>	<b>Response</b>
<b>Scale of Growth</b>	Policy 20	Move from no net change in camping and caravanning supported. Impact will vary depending on proposal and site specific considerations. Criterion f should be amended to reflect this.	Noted. Criterion f contains a cross reference to Policy 38A of the Plan which provides further details of the site-specific conditions.
<b>Minerals</b>	4.129 – 4.133	The Local Development Plan should clarify whether the shortfall of sand and gravel has already been addressed across the region?	Text has been updated to clarify current position. <b>Amendment done.</b>
<b>Minerals</b>	Policy 21	Replace 'reserves' with 'resources' and clarify what is meant by 'no suitable alternative'.	<b>Amendment done.</b>
<b>Minerals</b>	Policy 21	Clarify that where prior extraction is required it is only for shallow reserves.	<b>Amendment done.</b>
<b>Minerals</b>	Policy 21	Policy should also have regard to impact upon amenity in criterion (c).	<b>Amendment done.</b>
<b>Minerals</b>	Policy 22	Policy reads as a statement and could be amended.	Wording has been amended to provide a criteria based policy. <b>Amendment done.</b>
<b>Minerals</b>	Policy 22	Clarity is required on active and inactive sites and types of development that would/would not be acceptable.	Additional clarification has been provided in the reasoned justification for Policy 26. <b>Amendment done.</b>

<b>Topic</b>	<b>Plan Reference Preferred Strategy</b>	<b>Issue</b>	<b>Response</b>
<b>Minerals</b>	Policy 23	Criterion (i) – Methley judgement may have implications.	Noted. Comment specifically relates to criterion (i) which deals with after use/restoration.
<b>Minerals</b>	Policy 25	There may be a need for temporary storage sites for recycled materials.	Noted. Policies 25 and 27 will apply in these cases.
<b>Minerals</b>	Policy 26	Clarity is required on the inactive sites, their current status, whether prohibition orders will be sought or likely future use/restoration.	Further clarification has been provided in the reasoned justification to Policy 26. <b>Amendment done.</b>
<b>Waste</b>	Policy 27	Policy should identify employment sites suitable for meeting waste requirements and require a Waste Planning Assessment for proposals.	There are no Employment Sites currently identified. Policy 27 has been amended to require a Waste Planning Assessment. <b>Amendment done.</b>
<b>Waste</b>	4.144	Refer to civic amenity sites and recycling centres as the two are frequently combined.	<b>Amendment done.</b>
<b>Waste</b>	4.162	Add text to ensure provision is made for internal and (where possible) external storage.	It is not considered that the current wording prohibits either internal or external storage. Each case will be determined on its merits.

## 4 C Climate change, Sustainable Design, Renewable Energy, Flooding

<b>Topic</b>	<b>Plan Reference Preferred Strategy</b>	<b>Issue</b>	<b>Response</b>
<b>Sustainable Design</b>	Policy 29	Dwr Cymru/Welsh Water fully supports the policy and particularly criterion h (water and drainage).	Support is noted.
<b>Renewable Energy</b>	Policy 33	Permitted development rights for renewable energy proposals should be made clear in the Plan.	A reference to the relevant Statutory Instrument has been provided as a footnote to Policy 33. <b>Amendment done.</b>
<b>Renewable Energy</b>	Policy 33	<ul style="list-style-type: none"> <li>▪ The policy should be amended to ensure the following are considered in appraisal of renewable energy proposals:               <ul style="list-style-type: none"> <li>○ Visual and amenity impact of small turbines should not be over-estimated;</li> <li>○ Balance the visual impact of proposals against global environmental benefits;</li> <li>○ Consider the economic benefits of proposals to landowners, businesses and</li> </ul> </li> </ul>	The points raised are acknowledged as being valid material planning considerations when considering renewable energy development. The current wording of the policy allows each case to be determined on its merits and is not considered to prohibit the inclusion of any of the listed considerations when determining development proposals. The Plan should be read as a whole as advised in the introductory text of the Plan.

<b>Topic</b>	<b>Plan Reference Preferred Strategy</b>	<b>Issue</b>	<b>Response</b>
		Wales (compared with costs of fossil fuels); ○The community's evaluation of 'amenity' will depend on their perceived benefits a scheme brings.	
<b>Flooding</b>	Flooding and Coastal Inundation	Less sensitive development can be permitted in flood-risk areas.	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'. <b>Amendment done.</b>
		Tarmacking of gardens can result in drainage issues.	This is not known to be a significant issue within the National Park.
<b>Coastal Management</b>	Flooding and coastal inundation	The development plan will need to ensure all allocated sites adhere to local and national policy which recognises that the undeveloped coast is rarely the most appropriate location for development.	Noted.
<b>Amenity</b>	Policy 30	The policy wording should be amended to include flexibility that allows for mitigation of adverse impacts on amenity to help promote	The Plan has been reviewed to ensure that there is a consistency of approach where policies refer to assessing impacts. Terms have also been

<b>Topic</b>	<b>Plan Reference Preferred Strategy</b>	<b>Issue</b>	<b>Response</b>
		suitable and sustainable development.	explained in the Glossary of Terms. <b>Amendment done.</b>
<b>Surface Water Drainage</b>	Policy 32	Inclusion of the policy is welcomed by Dwr Cymru/Welsh Water.	Support is noted.
<b>Renewable Energy</b>	Policy 33	General support for the policy by Dwr Cymru/Welsh Water, but seek to ensure that their infrastructure is not affected by renewable energy developments.	Dwr Cymru/Welsh Water are routinely consulted on planning applications and will have the opportunity to identify where infrastructure requires protections from development.
<b>Renewable Energy</b>	Policy 33	The landscape character sensitivity and potential for wind turbines in the Angle Peninsula should be reassessed to take into account the outcomes of the Rhoscrowther Inquiry.	This comment relates to existing Supplementary Planning Guidance which did not form part of the Preferred Strategy Consultation. However the current guidance is still considered to be relevant as other development schemes may be feasible.
<b>Renewable energy</b>	Policy 33	<ul style="list-style-type: none"> <li>▪ Include a 500m buffer zone between residents and wind turbines.</li> <li>▪ The buffer zone should be extended when the turbines are level with or higher</li> </ul>	The suggested buffer zone is not considered appropriate for the small scale developments that are more applicable to the National Park. These buffer zones (in national guidance) refer to large scale schemes and wind farms.
<b>Renewable energy</b>	Policy 33	Replace the word 'considerations' with 'concerns' to clarify the meaning of the policy.	No issues have arisen with the current wording of the Policy. No change proposed.

<b>Topic</b>	<b>Plan Reference Preferred Strategy</b>	<b>Issue</b>	<b>Response</b>
<b>Renewable energy</b>	Policy 33	<p>The policy approach and evidence base needs to be clarified and refined:</p> <ul style="list-style-type: none"> <li>▪ Show how the Renewable Energy Assessment is embedded in the Candidate Sites process;</li> <li>▪ Embed the Renewable Energy Assessment conclusions in the Plan and monitor their delivery;</li> <li>▪ Align Policy 33 with national planning policy (in relation to size);</li> <li>▪ Include specific thresholds for development which align with national policy and the Renewable Energy Assessment.</li> </ul>	<p>Additional clarification has been added to the reasoned justification of the policy to highlight the Renewable Energy Assessment and national policy, the justification for the policy scales and specific technologies and impacts.</p> <p>The larger scale sites have been considered for potential combined renewable energy generation viability and no opportunities have arisen.</p> <p><b>Amendment done in part.</b></p>
<b>Renewable Energy</b>	Policy 33	<ul style="list-style-type: none"> <li>▪ Give greater acknowledgement of the impact renewable energy schemes can have on holiday accommodation and the tourist sector;</li> <li>▪ Amend Policy 33 to</li> </ul>	<p>The impact of renewable energy developments on neighbouring amenity with regard to noise, shadow flicker, glare, visual prominence (overbearing) etc. form normal planning considerations that are taken into account on a case by</p>

<b>Topic</b>	<b>Plan Reference Preferred Strategy</b>	<b>Issue</b>	<b>Response</b>
		give a clear test on environmental and amenity impacts (require 'no adverse impacts' rather than 'no over-riding impacts').	case basis.. It is considered that the current wording of the policy provides adequate scope for appropriate weight to be placed on any detrimental amenity or landscape impact. However, in order to be consistent with policy wording elsewhere in the Plan an amendment is proposed.  <b>Amendment done.</b>
<b>Flooding and Coastal Innundation</b>	Policy 34	The policy should allow replacement community facilities to be better than those lost in coastal risk areas.	This policy deals with the issue of property becoming 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.
<b>Flooding and Coastal Innundation</b>	Policy 34	The policy should endorse proposals that provide improvements to the existing flooding position.	The national policy context supported by the policies set out in the Preferred Strategy allow for consideration of such cases.
<b>Coastal Change Management</b>	Policy 34A	Tourism related development should be permitted within the	The policy allows for less vulnerable developments within such areas where

<b>Topic</b>	<b>Plan Reference Preferred Strategy</b>	<b>Issue</b>	<b>Response</b>
		Coastal Change Management Areas in order to increase expenditure, provided it results in no increased risk to life or property.	compatible with the Plan's policy framework.
<b>Coastal Change Management</b>	Policy 34B	<ul style="list-style-type: none"> <li>▪ Who decides if dwellings are likely to be affected within 20 years?</li> <li>▪ Why 20 years?</li> </ul>	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. Twenty years is the timescale that Government guidance states (for the purposes of Shoreline Management Plans) as the 'present time' or 'short-term'
<b>Coastal Change Management</b>	Policy 34C	<ul style="list-style-type: none"> <li>▪ Criterion d) is unnecessary as it repeats national planning policy.</li> </ul>	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. <b>Amendment done.</b>

## 4 D Visitor Economy

<b>Topic</b>	<b>Plan Reference Preferred Strategy</b>	<b>Issue</b>	<b>Response</b>
<b>Visitor economy strategy</b>	Policy 35	The approach to optimise rather than increase visitor numbers is overly restrictive.	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.
<b>Visitor accommodation strategy</b>	Policy 35	Clarify the approach to cater for visitor accommodation, based on evidence over the Plan period.	There are no known proposals for visitor accommodation requiring a specific allocation in the Plan. The policy approach allows for consideration of proposals coming forward in the context of protecting the National Park landscape.

<b>Topic</b>	<b>Plan Reference Preferred Strategy</b>	<b>Issue</b>	<b>Response</b>
<b>Visitor accommodation strategy</b>	Policy 35	Include a separate policy to support new serviced accommodation proposals through new build or conversion.	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.
<b>Visitor accommodation strategy</b>	Policy 35 a)	Delete the word 'limited' from this criterion to allow consideration of proposals on a case by case basis.	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, as suggested would reduce the clarity of the approach.
<b>Visitor accommodation strategy</b>	Policy 35 e)	Amend wording to use 'in or adjoining' Centres which will better protect the Special Qualities of the National Park.	The wording of the policy replicates that used in Planning Policy Wales for employment and business sites in

<b>Topic</b>	<b>Plan Reference Preferred Strategy</b>	<b>Issue</b>	<b>Response</b>
			rural areas. The policy also allows for consideration of proposals which do not meet the 'within or adjacent to' criterion. Policy 8 of the Plan specifically relates to the Special Qualities and the need for their protection and enhancement.
<b>Visitor accommodation strategy</b>	Policy 37	Concern that prioritisation of full-time residential use over self-catering may result in dereliction and ultimate loss of buildings if owners are not seeking full residential use.	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.
<b>Visitor accommodation strategy</b>	Policies 37 and 38A	Clarification needed on how chalet developments will be treated.	Typographical error resolved by deleting reference to chalets from paragraph 4.199 of the Plan. Chalets will be considered under Policy 38A and not 37. <b>Amendment done.</b>
<b>Camping and Caravanning</b>	Supplementary Planning Guidance (Plan paragraph 4.204)	Important to include maps to identify areas where additional development will be permitted. Early stakeholder consultation is requested.	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

<b>Topic</b>	<b>Plan Reference Preferred Strategy</b>	<b>Issue</b>	<b>Response</b>
			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.
<b>Camping and Caravanning</b>	General	Supports recognition of the changing patterns of visitor accommodation in the Plan.	Noted.
<b>Camping and Caravanning</b>	Policy 38A	Clarify in the Plan which areas are suitable to accommodate additional camping and caravanning development.	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.
<b>Camping and Caravanning</b>	Policy 38A	Need to define the term 'away from' in this policy.	There is reference to definition of terms in paragraph 4.208 of the Preferred Strategy. The reference can be clarified further. <b>Amendment done.</b>

<b>Topic</b>	<b>Plan Reference Preferred Strategy</b>	<b>Issue</b>	<b>Response</b>
<b>Camping and Caravanning</b>	Policy 38A	Existing site operators may wish to continually upgrade sites and seek a policy to consider sites on a case- by-case basis and support for net increases in accommodation, including within coastal areas.	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.
<b>Camping and Caravanning</b>	Policy 38A a)	Amend the wording to clarify that within existing sites it is 'types of accommodation' changes only.	It can be the type or level of accommodation considered within existing sites. An amendment is suggested to clarify this. <b>Amendment done.</b>
<b>Camping and Caravanning</b>	Policy 40	Include additional text from paragraph 4.218 to ensure the need for balancing new site facilities with safeguarding of Centres is fully considered.	The existing wording is considered to provide the appropriate policy context for considering new site facilities.

<b>Topic</b>	<b>Plan Reference Preferred Strategy</b>	<b>Issue</b>	<b>Response</b>
<b>Camping and Caravanning</b>	Policy 41	Request that the policy is not deleted and that proposals for changes of tent pitches to touring caravan pitches will be supported, in principle.	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.
<b>Employment</b>	General	<p>The flexible approach to employment proposals is supported by the Welsh Government and is considered to be in line with National Planning Policy.</p> <p>Large employers in the energy and service sectors and the many small and medium enterprises are both of key importance to the future prosperity of Pembrokeshire.</p>	Noted.
	General	The Authority should consider a safeguarding policy that identifies and lists any established employment sites.	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.

## 4 E Affordable Housing

<b>Topic</b>	<b>Plan Reference Preferred Strategy</b>	<b>Issue</b>	<b>Response</b>
<b>Older People Housing</b>	Housing	Stronger encouragement for older people housing needed.	The issues around such provision is highlighted in the Equalities Impact Assessment for the Plan. There are limitations on the ability to influence the mix and design of housing. A Welsh Government response is needed regarding this issue.
<b>Housing growth Options</b>	Housing	Ensure a range of options are tested to inform future levels of growth.	Noted. An additional background paper was commissioned entitled 'Demographic Forecasts.'
<b>Housing Requirement</b>	Housing	This should be clearly evidenced. How will it maximise affordable housing delivery?	The background papers and introductory text to the Housing Chapter provides this evidence.
<b>Flexibility</b>	Housing	Evidence of the level of flexibility needed. Assumptions regarding the expected non-delivery of sites need to be explained.	Noted. <b>Amendments done.</b>  Regarding the non-delivery of sites additional advice has been provided. <b>Amendment done.</b>
<b>Affordable Housing Targets</b>	Housing	Concern regarding the thresholds used for allocating sites is primarily hinged on the delivery of affordable housing.	This requirement will be removed. <b>Amendment done.</b>
<b>Affordable housing and self-catering</b>	Policy 43	How will Policy 43 work in practice given that residential development is supported in principle in Centres?	This policy approach has been in operation under the current Local Development Plan. The Authority would refuse permission for self catering (which would be subject to a holiday let occupancy

<b>Topic</b>	<b>Plan Reference Preferred Strategy</b>	<b>Issue</b>	<b>Response</b>
			condition) where affordable housing could be accommodated.
<b>Gypsies and Travellers</b>	Policy 46	Ensure any unmet need is addressed in the Plan.	No need is identified for the Pembrokeshire Coast National Park. The reasoned justification of Policy 46 has been amended to reflect this. <b>Amendment done.</b>
<b>Gypsies and Travellers</b>	Policy 46 Criterion A)	Circular 30/2007 advises that evidence of need would work against the freedom of movement of Gypsies and Travellers	The current wording of the policy is considered appropriate. A new Gypsy Traveller Circular is awaited from Welsh Government.
<b>Delivery and Phasing</b>	Housing	Ensure sites are deliverable and the timing for that delivery is set out.	Noted. The Deposit Local Development Plan will be supported by a Land Implementation Study and a trajectory in the Housing Background Paper.
<b>Housing Provision</b>	Housing	Don't be overambitious like last time.	Agreed.
<b>Housing Provision</b>	Housing	It may have been ambitious last time but it's closer to what you need this time. Could you include some aspirational growth?	The Deposit Plan will need to focus on providing for a land supply that is considered to be deliverable over the life of the Plan.
<b>Affordable Housing Monitoring</b>	Housing	Adjust the monitoring regime to a 6 monthly cycle.	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.

<b>Topic</b>	<b>Plan Reference Preferred Strategy</b>	<b>Issue</b>	<b>Response</b>
<b>Type of affordable housing</b>	Housing	Should rental be prioritised?	Clarification has been sought with Pembrokeshire County Council and some edits done to the reasoned justification. <b>Amendment done.</b>
<b>Local Housing Market Assessment</b>	Policy 45	Can more affordable housing be provided as there is a high level of need in the Local Housing Market Assessment.	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 the commenting authority felt strongly about in recent times.
<b>One Planet Development</b>	Policy 47	Clarify regarding the Authority's approach to the re-use of buildings.	Amendment to the reasoned justification done. <b>Amendment done.</b>

#### **4 F Community Facilities, Retailing, Transport**

<b>Topic</b>	<b>Plan Reference Preferred Strategy</b>	<b>Issue</b>	<b>Response</b>
<b>Retail</b>	General	Explanation of how the Authority will address the findings of the 2017 Regional Retail Study	Additional text has been inserted in to the reasoned justification of the Retail Section of

<b>Topic</b>	<b>Plan Reference Preferred Strategy</b>	<b>Issue</b>	<b>Response</b>
		is needed.	the plan highlighting the findings of the study and that criteria based policy will continue to be used. <b>Amendment done.</b>
<b>Retail</b>	General	Smaller retail centres should be defined and shown on the Proposals Map. The policy approach needs to help retain retail uses and maintain a balance with leisure uses.	References to smaller 'retail centres' has been changed to 'rural centres' for clarification. The policy therefore applies to all Tier 4 Centres. <b>Amendment done.</b>
<b>Retail</b>	General	Extend the retail centre boundary at Tenby to include the existing supermarket on Upper Park Road.	The supermarket is not part of the core retail centre and is separated from it by non-retail uses which would create a distorted and false boundary. The supermarket does not contribute to the character of the retail centre.
<b>Community Facilities and Infrastructure</b>	Policy 48	Priorities for contributions sought through planning obligations need to be made clear in the Plan to inform provision of infrastructure and avoid unviability of schemes.	Edits to Policy 48 should address this issue. <b>Amendment done.</b>
<b>Retail</b>	Policy 50	Need to modify policy approach in order to address high levels of vacancy in town centres across Pembrokeshire.	The National Park centres are not experiencing high levels of vacancy and are considered to be performing well. This is

<b>Topic</b>	<b>Plan Reference Preferred Strategy</b>	<b>Issue</b>	<b>Response</b>
			noted in the Regional Retail Study also. No change in strategy is proposed in this regard.
<b>Transport</b>	Policy 52	Approved cycle and footway schemes for the next 15 years should be available for inclusion in the Deposit Plan.	Noted. No schemes have needed to be identified in the Local Development Plan.
<b>Transport</b>	Policy 53	Policy should take account of air pollution.	Issues such as impacts on air quality will be considered in conjunction with Planning Policy Wales, Edition 9, November 2016, Welsh Government, Chapter 13 and the amenity policy, Policy 30.
<b>Transport</b>	Policy 54	Request for a specific policy on the protection of disused transport corridors for conversion to cycle routes.	Pembrokeshire County Council do not have any transport proposals to be included in the Deposit Plan.
<b>Powerlines and Pipelines</b>	Policy 55	Amend the policy to take account of amenity.	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.
<b>Telecommunications</b>	Policy 56	Amend the policy to take account of amenity.	Policy 30 already takes amenity into account and includes the need to consider the amenity

<b>Topic</b>	<b>Plan Reference Preferred Strategy</b>	<b>Issue</b>	<b>Response</b>
			of places where people live or visit. The suggested addition to this policy is not considered to be necessary.

## 5 Monitoring and Other issues

<b>Topic</b>	<b>Plan Reference Preferred Strategy</b>	<b>Issue</b>	<b>Response</b>
<b>General</b>	5.0 Monitoring	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).	Advice noted. Amendments done.

<b>Topic</b>	<b>Plan Reference Preferred Strategy</b>	<b>Issue</b>	<b>Response</b>
<b>Transport</b>	Indicator 31	Should read pedestrians cyclists and vehicles	Agree. Amendment done.
<b>Renewable Energy</b>	Indicator 14	Should monitoring be primarily on 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.	Agree. Amendment done.
<b>Employment</b>	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.
<b>General</b>	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,	Agree. Amendment done.

<b>Topic</b>	<b>Plan Reference Preferred Strategy</b>	<b>Issue</b>	<b>Response</b>
		mostly modest, changes in direction.	
<b>General</b>	5.4	There should be a priority g - Transport and accessibility	This list relates to the Chapter headings and f) already includes transport.
<b>General</b>	Glossary	Insert additional rows for recently introduced Use Classes C2A – Secure Residential Institutions and C4 – Houses in Multiple Occupation.	Agree. <b>Amendment done.</b>
<b>Maps</b>	Key Diagram	The classification of settlements should be restricted to those in the National Park (including cross-boundary ones), unless derived from a higher level document such as the Wales Spatial Plan.	Agree. The Key Diagram has been checked and it matches the approach taken in the Wales Spatial Plan. The approach taken is compliant with paragraph 6.4.2.2 of the Local Development Plan Manual August 2015.

## Question 2 Candidate Site Register

21. 121 comments were received from 71 commentators. Listed below are the main Candidate Site Register issues from the Pre-Deposit Consultation and how the Authority has responded.
22. The table below has five columns. Column 1 lists the Community Council area where the site is located in alphabetical order, Column 2 provides the number of the site and its location. Column 3 advises the number of submissions received on that site. Column 4 advises the main issues raised in relation to the site and Column 5 advises of the Authority response.

<b>Community Council Area</b>	<b>Site number and location</b>	<b>Number of submissions received</b>	<b>Main issues raised</b>	<b>Response</b>
<b>Angle</b>	116 – East of West Bay Close, Angle	1	Community Council supports the development of this site for up to 10 affordable houses for local village-based families.	Support in principle is noted.
<b>Angle</b>	117 – West of Angle Caravan Park, Angle	1	Community Council does not support the development of the land for a camping site and wishes it to remain in agricultural use.	The assessment of site 117 concludes that it would not be appropriate to develop which accords with this comment from the Community Council.
<b>Angle</b>	118 – North of West Bay Close, Angle	1	The Community Council does not support the development of the land for housing as it would be visible from the sea and reduce the long narrow field which is an example of historic farming in the area.	A small development extending no further than the extent of the neighbouring property curtilages is not considered to be intrusive. No change to the

<b>Community Council Area</b>	<b>Site number and location</b>	<b>Number of submissions received</b>	<b>Main issues raised</b>	<b>Response</b>
				assessment is recommended.
<b>Dinas Cross</b>	008 – Bryn y Wawr	1	Development directly backs onto back gardens of properties depriving privacy.	The Site Assessment considers that a small development of one or two units would be acceptable in principle. Detailed amenity considerations to be considered at application stage.
<b>Dinas Cross</b>	013 - Land South of Rhoshelyg and West of Spring Hill	1	Extremely busy and fast stretch of road along the A487, difficult to access from Spring hill and existing accesses.	Welsh Government Trunk Road Agency has advised that an access on to the A487 could be possible but further information is required to fully assess.
<b>Dinas Cross</b>	032 - Rhoshelyg	1	<ul style="list-style-type: none"> <li>▪ Drainage concern</li> <li>▪ Access will be difficult onto a busy and fast strip of road where people frequently overtake and fuel tankers and delivery wagons access the garage/shop.</li> <li>▪ Development directly</li> </ul>	See response below.

<b>Community Council Area</b>	<b>Site number and location</b>	<b>Number of submissions received</b>	<b>Main issues raised</b>	<b>Response</b>
			backs onto back gardens of properties depriving privacy.	
<p><b>Response:</b> The site lies on wet marshland and high drainage costs are considered likely. The implications for considering whether the site is viable are being explored. The Welsh Government Trunk Road Agency has advised that an access on to the A487 could be possible but further information is required to fully assess. The Site Assessment considers that a small development in the North Eastern corner of the site would be acceptable in principle, detailed amenity considerations can be considered at application stage.</p>				
<b>Dinas Cross</b>	054 - Land to rear of Angorfan Bungalow and Dinas Cross Service Station	4	See row below.	See row below.
<p><b>Main Issue Raised</b></p> <p>Extremely busy and fast stretch of road along the A487, difficult to access from Spring Hill and existing accesses – how many cars will development generate?  Visual impact concerns including from the viewpoint to the south.  Sewage capacity concerns, existing facilities not suitable.  Drainage concerns – land is wet and boggy.  Road network not capable of accommodating extra traffic movements.  Development directly backs onto back gardens of properties depriving privacy.  Site would be suitable depending on where buildings sit and their height to protect the amenity and light levels for neighbouring properties.  The extension of the shop, garage and Post Office would be welcomed for the village.  The site is close to all services and in a good location for the community.</p> <p><b>Response</b></p> <p>The Welsh Government Trunk Road Agency has advised that an access on to the A487 could be possible but further information is required to fully assess.</p> <p>The site assessment has considered the visual impact and considers the site to be acceptable in this respect.</p> <p>Dwr Cymru has advised that sewage capacity is available for this site, although point of</p>				

<b>Community Council Area</b>	<b>Site number and location</b>	<b>Number of submissions received</b>	<b>Main issues raised</b>	<b>Response</b>
connection requires 3 <sup>rd</sup> party land.				
The site lies on wet marshland and high drainage costs are considered likely. Further work is needed regarding the viability of the proposal.				
Detailed amenity considerations can be considered at application stage.				
<b>Dinas Cross</b>	074 – Land at Spring Hill	2	<ul style="list-style-type: none"> <li>▪ Extremely busy and fast stretch of road along the A487, difficult to access from Spring hill and existing accesses – how many cars will development generate?</li> <li>▪ Drainage concerns – land is wet and boggy.</li> <li>▪ Habitat impact concerns</li> <li>▪ Visual impact concerns including from the viewpoint to the south.</li> <li>▪ Greenery impact concerns</li> <li>▪ Sewage capacity concerns, existing facilities not suitable.</li> <li>▪ Road network not capable of accommodating extra traffic movements.</li> <li>▪ Development directly backs onto back gardens of properties depriving privacy.</li> </ul>	<p>See above for Site No. 054 Land to rear of Angorfan Bungalow and Dinas Cross Service Station</p> <p>Further work is required to assess the ecological impact of the site.</p>
<b>Dinas Cross</b>	092 – Land adjacent Porthlinsky	1	<ul style="list-style-type: none"> <li>▪ Development directly backs onto back gardens of properties depriving privacy.</li> </ul>	The Site Assessment concludes that this site would not be acceptable for

<b>Community Council Area</b>	<b>Site number and location</b>	<b>Number of submissions received</b>	<b>Main issues raised</b>	<b>Response</b>
				development although not due to a loss of privacy to existing properties, for which the impact could be fully considered at application stage.
<b>Dinas Cross</b>	095 – Land at Spring hill	1	<ul style="list-style-type: none"> <li>▪ Extremely busy and fast stretch of road along the A487, difficult to access from Spring hill and existing accesses – how many cars will development generate?</li> <li>▪ Road network not capable of accommodating extra traffic movements.</li> <li>▪ Drainage concerns – land is wet and boggy.</li> <li>▪ Habitat impact concerns</li> <li>▪ Visual impact concerns including from the viewpoint to the south.</li> <li>▪ Greenery impact concerns</li> <li>▪ Sewage capacity concerns, existing facilities not suitable.</li> </ul>	<p>See above for Site No. 054 Land to rear of Angorfan Bungalow and Dinas Cross Service Station</p> <p>Further work is required to assess the impact the site's development would have on ecological interests.</p>
<b>Dinas Cross</b>	105 – Land adjacent Nyth y Wennol	5	Main issues – see row below	See row below.
<b>Main Issues:</b>				

<b>Community Council Area</b>	<b>Site number and location</b>	<b>Number of submissions received</b>	<b>Main issues raised</b>	<b>Response</b>
				<p>Picturesque site on a slope, development would lose the unique tranquil character, even if for just one house</p> <p>Would cause a loss of grazing land for sheep.</p> <p>Access is too narrow for traffic especially delivery lorries.</p> <p>There is a stream which will have to be crossed over.</p> <p>House values would be de-valued with this development.</p> <p>Cannot live with the noise, dust and mud pollution from construction machinery.</p> <p>Development would spoil beautiful views.</p> <p>Site would be expensive to build (dues to drainage, mains water, electricity, gas and levelling and felling of trees) and therefore be unlikely for affordable housing but more likely for second homes.</p> <p>Agree with the Site Assessment that site would be unsuitable.</p> <p>Lane is currently used by walkers on their way to the coastal path with the bus stop providing useful access.</p> <p>Hedgerows and the natural beauty would be destroyed by development.</p> <p>Piping the stream destroys the sensual nature of hearing it.</p> <p>Development would interrupt the skyline of the field and the view and sunsets at this point.</p> <p>We want to enjoy the peace and tranquillity having moved here.</p> <p>Development would eat into the pleasures of offering and promoting the Park to visitors and would impact negatively on tourism which provides income for the younger generation to remain in the area and balance communities.</p> <p>I ecology not a factor? If becomes any less important the Earth is doomed.</p> <p>Please place homes in already developed areas.</p> <p>The site is a greenfield site with Green Wedge status.</p> <p>The village green is owned by a Barony, if developed for access this would cause a major expense.</p> <p>The boundary stream is subject to seasonal flooding presenting further access problems.</p> <p>Sewerage capacity is already inadequate.</p> <p>The ancient Baptistry would need to be preserved.</p> <p>We agree with the conclusions of the Sustainability Appraisal.</p> <p>The site can be assimilated into the landscape with minimal impact on views</p> <p>Only minor alterations to the lane, culverting of the stream and hedgerow removal is required for access.</p> <p><b>Response</b></p> <p>The Site Assessment concludes that development at this location would be unacceptable due to the detrimental landscape and amenity impact also taking into account the impact of necessary highway improvements, the existing Green Wedge and Open Space designations in the current Local Development Plan and the public right of way.</p>

<b>Community Council Area</b>	<b>Site number and location</b>	<b>Number of submissions received</b>	<b>Main issues raised</b>	<b>Response</b>
The site is not proposed for allocation or inclusion within the Centre boundary.				
<b>Dinas Cross</b>	124 – East of Tower Hill	24	See Row below	See row below.

### **Main Issues**

The site is not located close to employment opportunities.

Surface water drainage capacity is already overloaded; the land is unsuitable for effective soakaway as underlain with clay. A proper and adequate system of surface water drainage must be provided to dispose of all areas adoptable by the Highways Authority; soakaways are not acceptable to the Highways Authority.

Increase in surface water run-off from this site will damage wildlife and fauna further down the valley.

Sewerage capacity is already overloaded.

Development would make the water quality at Pwllgwaelod beach even worse through drainage and sewage pollution.

Development would increase pollution from construction and private vehicles.

Development would increase light pollution in the area.

Development would cause an unacceptable impact upon the natural, historic and rural landscape character of Brynhenllan and be visible from the coastal path along Dinas Head. It would be out of character with the ribbon development form.

Development would disrupt the topographical symmetry of the village.

The density of development would cause a housing estate appearance that would be out of character.

Development would spoil the viewpoint above Spring Hill.

Visual impact upon the existing landscape character and coastal path would reduce the number of visitors to the area.

Why is Site 124 coloured in green and Site 136 in amber when Site 124 is clearly visible from the coastal path and Site 136 is not?

New planting and screening would take years to mature.

There are possible archaeological remains and graves could exist given the proximity to the neighbouring Ty Gwyn site and its important historical interest.

Development would result in the permanent loss of agricultural land.

The site is designated as a Green Wedge which makes it unsuitable for development.

The existing road access is inadequate and a long standing boundary dispute exists that would prevent the widening of the access to meet the Manual for Streets requirements.

The site would increase the use of the private car; there is no pavement to the centre of the village or any room for one. There is no public transport near the site.

Development would exacerbate highway safety concerns for both pedestrians and vehicle users.

There is no school in Dinas Cross and so children would need to walk along the road with no pavement.

The site provides substantial biodiversity value and supports an abundance of wildlife including

<b>Community Council Area</b>	<b>Site number and location</b>	<b>Number of submissions received</b>	<b>Main issues raised</b>	<b>Response</b>
<p>badgers, barn owls, bats, red kites, buzzards, small birds, butterflies and moths. Development would cause a loss of habitat which cannot be mitigated for.</p> <p>High density to achieve affordable housing provision would threaten mature natural boundaries. Affordable Housing provision should match local need not be packaged where it is possible to find sites.</p> <p>Provision on this site is not compatible with Planning Policy Wales section 9.1 or Technical Advice Note 6 paragraphs 4.1.2 and 4.2.1- 4.2.4.</p> <p>Affordable housing would need to be constructed to a high design standard to maintain the cultural distinctiveness of the village, this would increase costs for the developer.</p> <p>Is there a need for new housing given the amount of long standing housing currently on the market and lack of employment opportunities?</p> <p>Who will want market priced housing next to affordable housing?</p> <p>The scale of development is disproportionate to the scale of Brynhenllan.</p> <p>The site would attract high premium homes leading to an increase in second home ownership. This would be detrimental to the cultural distinctiveness of the village.</p> <p>Development would devalue the existing housing stock.</p> <p>The area has poor broadband coverage.</p> <p>Local medical services are inadequate to accommodate extra development.</p> <p>The site is located in Brynhenllan not Dinas Cross.</p> <p>Sites allocated for development should be chosen to make the best relations with the people who are affected by the building.</p> <p>Development directly backs onto back gardens of properties depriving privacy.</p> <p>Development would cause the loss of open space.</p> <p>The road floods at peak rainfall.</p>				
<p><b>Response</b> This site is not proposed for allocation or inclusion within the Centre boundary for Dinas Cross within the Deposit Local Development Plan. The comments made are noted. The Site Assessment (see the Candidate Site Register) has been updated in light of comments received and the findings of the Land Implementation Study.</p>				
<p>The existing Green Wedge designation is also included in the review process of the replacement Local Development Plan. The Settlement Capacity Study and subsequent Officer site visits have identified landscape capacity on this site for housing development. As such the Green Wedge status is not proposed for retention within the Deposit Local Development Plan.</p>				
<b>Dinas Cross</b>	125 – West of Feidr Fawr	1	One of the most suitable for development as no back gardens look onto the site	Support is noted, however the landowner has informed the Authority that there is no

<b>Community Council Area</b>	<b>Site number and location</b>	<b>Number of submissions received</b>	<b>Main issues raised</b>	<b>Response</b>
				intention to develop the site.
<b>Dinas Cross</b>	134 – Land opposite Bay View Terrace (to field boundary)	1	One of the most suitable for development as no back gardens look onto the site	Support is noted, however this site is (in part) a current allocation in the current Local Development Plan which has not shown any prospect of being developed and cannot therefore be considered as deliverable.
<b>Dinas Cross</b>	135 – Rear of Spring hill and Bro Helyg	3	<ul style="list-style-type: none"> <li>▪ Visual impact concerns from the viewpoint to the South.</li> <li>▪ Development directly backs onto back gardens of properties depriving privacy.</li> <li>▪ Much of the land is under our ownership and we have not been informed of this Candidate Site.</li> </ul>	See row below.
<p><b>Response:</b> The Site Assessment concludes that the majority of the site would be unacceptable on landscape impact grounds (except the north east corner).</p> <p>Detailed neighbouring amenity considerations will take place at application stage however the north east section is considered acceptable in principle in this respect and is included within the revised Centre boundary.</p> <p>Landowners were informed (by letter) of Candidate Site proposals where known. Some Land Registry searches failed to provide landowner details.</p>				
<b>Dinas Cross</b>	136 - Land South of	6	See row below	See row below.

<b>Community Council Area</b>	<b>Site number and location</b>	<b>Number of submissions received</b>	<b>Main issues raised</b>	<b>Response</b>
	A487, South West of Castle Terrace			
<p><b>Main Issues:</b></p> <p>136A - One of the most suitable for development as no back gardens look onto the site.</p> <p>136A - Would be in keeping with other parts of the village. It would not impact the special qualities of the Park.</p> <p>136A - Site is in a much better position with regard to centralisation of the village, travel and access to amenities. There are pavements along the roads here and good public transport.</p> <p>136A - Road improvements would serve dual purpose of also slowing down traffic and improving pedestrian safety. Plenty of space for a mini roundabout.</p> <p>136A - Why is this site designated as Green Wedge but Site 124 is not in your comments columns as such?</p> <p>136A - Developing small part of this Green Wedge would have little impact on views from footpaths.</p> <p>136A - Access would be suitable if a new roundabout was provided.</p> <p>136A - Sewerage issues?</p> <p>136A - Deliverability of this site would require highway upgrades by the Trunk Road Agency and not the developer.</p> <p>136A - The site faces south and would be ideal for affordable housing or maybe the Ty Solar model.</p> <p>136A – support in principle but will need careful planning as visible from Dinas Mountain.</p> <p>136A – the land is unsuitable for agriculture.</p> <p><b>Officer Response</b> Support for this site is noted. Due to deliverability uncertainties, this site is not proposed for allocation within the Deposit Local Development Plan; however a proposal for an affordable housing exception site could be considered acceptable subject to the consideration of detailed material planning considerations.</p> <p>Both assessments acknowledge the current Green Wedge designations under the existing Local Development Plan, which have also been reviewed as part of the replacement plan process.</p>				
<b>Manorbier</b>	078 - Land to the West of B4585 Manorbier	1	<ul style="list-style-type: none"> <li>▪ The sustainability credentials of the site have been underestimated by the Authority.</li> <li>▪ Development would be relatively low in the</li> </ul>	See row below

<b>Community Council Area</b>	<b>Site number and location</b>	<b>Number of submissions received</b>	<b>Main issues raised</b>	<b>Response</b>
			landscape and result in a compact built form. <ul style="list-style-type: none"> <li>▪ Comparison of this site made with other locations around Skrinkle (not in the Centre boundary or submitted as Candidate Sites) to demonstrate preference for this site.</li> </ul>	
<p><b>Response:</b> The initial assessment of this site concluded that development in this location would result in a detached group of houses and encroachment into the countryside. It was recommended that use of the site for housing would not be compliant with the Preferred Strategy. There is no further information contained in this submission to alter the original assessment of the site. The applicant/agent has referred to other 'potential sites' in the locality, however none of the sites were submitted as Candidate Sites.</p>				
<b>Martletwy</b>	043 – Land adjacent to Bank Cottage, Lawrenny	1	The site could provide a valid building plot capable of supporting a single storey bungalow with retention of the stone boundary wall and new additional planting for screening purposes. The Candidate Site Appraisal should be rated 'green'.	This is a small plot with tree cover which also provides a strong boundary to Lawrenny. The size of the area between the road and the sports field would create a very cramped layout within the site as well as impacting on the trees which are a strong feature. Recommend no change to the site assessment.
<b>Martletwy</b>	044 – Broad	4	See row below	

<b>Community Council Area</b>	<b>Site number and location</b>	<b>Number of submissions received</b>	<b>Main issues raised</b>	<b>Response</b>
	Lane, Lawrenny			
<p><b>Main Issues:</b></p> <p>Prominent site at entrance to the village.  Development would cause intrusion in the landscape.  Development would compromise the Authority’s ability to deliver Park Purposes and threaten several Special Qualities.  Development would not be compatible with the strategy for Rural Centres.  Development would significantly increase the size of the village and overwhelm the existing residents.  New houses would be bought as second homes and create a ‘holiday village’ within Lawrenny.  Local facilities are very limited and car use is essential.  The private drainage system is inadequate to cater for new development and existing residents are concerned about funding of improvements.  The proposed footpath through the site (from site 045 Home Farm) is unnecessary.  There is a Deed of Covenant requiring many alterations within the village to be agreed to by the National Trust.  Site 44A is unviable in isolation and would need to be developed in conjunction with site 045 (Home Farm), but is incompatible with the current proposals for site 045.  Accesses to properties and open spaces within the village are not publicly maintained and will lead to additional cost.</p> <p>Development of the site would bring tangible benefits if developed in conjunction with site 045 (Home Farm).  Upgrading of the drainage tanks to cater for the 20 additional units on this site would reduce overall costs (compared with retro-fitting at a later date).  Site 44A would offer no commercial benefit and therefore little reason for the landowner to release the land.  Development of the whole of site 44 is necessary to blend it into the landscape and the proposed road will provide a defined edge to the development.  Green spaces can be incorporated to reduce the impact of development.  Consider alternative ways to deliver affordable housing – including acknowledgement that the landowner already offers reduced rent schemes in the village.  Look at options to provide a bus service to Lawrenny.  The development will bring improved broadband services to the village.  The private drainage system is fully licensed and available.</p> <p><b>Response</b></p> <p>A small area of the site has been identified as being suitable for development for a small number</p>				

<b>Community Council Area</b>	<b>Site number and location</b>	<b>Number of submissions received</b>	<b>Main issues raised</b>	<b>Response</b>
<p>of houses. As such a site would be regarded as a windfall site viability has not been considered. The Authority would resist development of the wider site as it would extend the village into the countryside and have a significant visual impact on the landscape. Recommend no change to the initial assessment of this site.</p>				
<b>Martletwy</b>	Site 045 – Home Farm, Lawrenny	4	▪	
<p><b>Main Issues:</b></p> <p>Principle of development of the site for housing is accepted.  Existing allocation is for 30 houses. Three have already been completed in The Old Barn.  The density of development is more suited to an urban environment.  The current farm buildings should be relocated prior to commencement of development of this site.  Detailed Development Management comments have been submitted.  A new access from the east should be considered.  There are concerns about existing traffic in Lawrenny. Additional traffic should be directed away from the village centre.  The site access arrangements need revision to minimise the impact on agricultural land.  Land bounded by Broad Lane, the shop, Long Barn and the existing access to Home Farm should not be subject to development.  There is a Deed of Covenant requiring any alterations within the village to be agreed to by the National Trust.</p> <p>Preliminary viability and affordable housing options have been presented and are being finalised as part of the planning application.  Housing proposals are being revised following a public consultation exercise.  The landowner would consider development of site 044 (Broad Lane) for affordable housing provision but sites 044 and 045 will need to be considered together.  A planning application to development site 045 for housing will be lodged in early August 2017.  Consider alternative ways to deliver affordable housing – including acknowledgement that the landowner already offers reduced rent schemes in the village.  An application for the relocation of the farm buildings has been submitted and will not be ‘bad neighbour’ development.  Look at options to provide a bus service to Lawrenny.  The development will bring improved broadband services to the village and provide office units.  The private drainage system is fully licensed and available.  The site is well placed adjacent to the public open space.</p>				
<p>Response: The site is allocated for residential development in the current Local Development Plan and a planning application is being prepared for submission to the Authority. Should the</p>				

<b>Community Council Area</b>	<b>Site number and location</b>	<b>Number of submissions received</b>	<b>Main issues raised</b>	<b>Response</b>
application not be submitted prior to the expiry of the current plan, then delivery of the site and potential to provide affordable housing provision will be critical elements of it being re-allocated in the Replacement Plan.				
The National Trust have been asked to provide the Deed of Covenant referred to.				
<b>Martletwy</b>	046 – Former Mansion Site, Lawrenny	3	See row below	See row below.
<p><b>Main Issues:</b></p> <p>The historic, Listed Church is very close to the site access.</p> <p>Concern about increased traffic on roads which are already congested in peak season. A traffic impact study is required.</p> <p>The private drainage system is inadequate to serve additional development and needs to be upgraded.</p> <p>Commercial broadband is limited.</p> <p>Maintenance of un-adopted infrastructure needs to be considered.</p> <p>The proposals are compatible with National Park Purposes.</p> <p>The National Park Authority tourism team and Visit Wales have been supportive of developing activities on the site.</p> <p>Allocation of the site will give certainty to prospective funders to bring the site forward for development in the medium to long-term.</p> <p>Preliminary reviews have identified sufficient land values to support development of a multi-million pound scheme.</p> <p>Events already held at the site have demonstrated its potential as a key tourism destination in Pembrokeshire.</p> <p>It will support other businesses in Lawrenny.</p> <p>Previous proposals have not been developed due to market conditions but lenders are now backing investments.</p> <p>Access to the site has been used without issue.</p> <p>A travel plan would allow consideration of alternative means of transport including car-sharing, buses, cycling. Public transport can be made available for specific events.</p> <p>The private drainage system is fully licensed and available.</p> <p>There would be no threat to mature trees or hedgerows.</p> <p>A key consideration will be to protect the cultural and heritage value of the site.</p> <p>The proposal is based on:</p> <p>Anchor events – festivals;</p> <p>Pop-up events – small concerts, weddings, outdoor cinema;</p> <p>and Accommodation</p>				

<b>Community Council Area</b>	<b>Site number and location</b>	<b>Number of submissions received</b>	<b>Main issues raised</b>	<b>Response</b>
<p><b>Response</b></p> <p>It is necessary to demonstrate that there are no fundamental impediments to the development of site allocated in the Plan. Insufficient evidence has been provided to include the site as an allocation. Should proposals for development come forward, they will be assessed against the generic policies of the Plan.</p>				
<b>Newport</b>	048 – Land off Feidr Bentick	2	<ul style="list-style-type: none"> <li>▪ This proposal would sacrifice a field which currently contributes to the beauty of the Newport environment.</li> <li>▪ Site should be re-considered based on the for the following reasons:</li> <li>▪ It is possible to achieve adequate visibility in accordance with the Design Manual for Roads and Bridges.</li> <li>▪ A new access onto the A487 could significantly improve pedestrian and vehicular traffic by providing a new link onto Feidr Bentick relieving it from traffic.</li> <li>▪ A new access onto the A487 can be achieved with minimal landscape impact. The bank is not a historic feature but a result of previous road improvements. No important trees or hedgerow will be lost.</li> <li>▪ Significant constraints on land availability exist in Newport with little other development opportunities.</li> </ul>	See row below

<b>Community Council Area</b>	<b>Site number and location</b>	<b>Number of submissions received</b>	<b>Main issues raised</b>	<b>Response</b>
<p><b>Response:</b> Objection is noted. It is considered that development accessed via Feidr Bentick would cause an unacceptable landscape impact on the assumption that a suitable access has not been demonstrated to be feasible from the A487.</p> <p>The Welsh Government Trunk Road Agency advised that access directly from the A487 would be unacceptable in principle (22<sup>nd</sup> March 2017). A plan of a proposed access has since been submitted by the agent at the end the Preferred Strategy consultation period (21<sup>st</sup> July 2017). Whilst it was understood that the objection was in principle, The Welsh Government Trunk Road Agency was re-consulted (3<sup>rd</sup> November 2017) and has since advised that further detailed plans would be required to confirm acceptability (5<sup>th</sup> December 2017).</p> <p>Without a suitable access the site cannot be considered further.</p>				
<b>Newport</b>	049 – Land off Ffordd Bedd Morris	1	This proposal would sacrifice a field which currently contributes to the beauty of the Newport environment.	Objection is noted. The Site Assessment agrees with this conclusion.
<b>Newport</b>	051 – Land east of Treffynon	1	This proposal would sacrifice a field which currently contributes to the beauty of the Newport environment.	Objection is noted. The Site Assessment agrees with this conclusion.
<b>Newport</b>	057 – Parc y Plant	1	When the war ended my father in law gave one of the fields at Dolwerdd to the town as a playing field, stipulating it should never be developed, I feel this might be Parc y Plant. Please investigate and advise.	A covenant agreement exists for the Town Council (the owners) to maintain the site for use only as a playing field for the benefit of the community, the agreement is dated 27 <sup>th</sup> July 1994.
<b>Newport</b>	066 – Land at Feidr Bentick	1	This proposal would sacrifice a field which currently contributes to the beauty of the Newport environment.	Objection is noted. It is considered that development accessed via

<b>Community Council Area</b>	<b>Site number and location</b>	<b>Number of submissions received</b>	<b>Main issues raised</b>	<b>Response</b>
				Feidr Bentick would cause an unacceptable landscape impact.
<b>Newport</b>	069 –Land north of Tir Treharn	3	<ul style="list-style-type: none"> <li>▪ This proposal would sacrifice a field which currently contributes to the beauty of the Newport environment and would cause an unacceptable impact on landscape and character.</li> <li>▪ Development would increase traffic on Feidr Ganol which already causes problems for pedestrians.</li> </ul>	Objection is noted. The Site Assessment agrees with this conclusion on landscape impact and highway constraints have also been highlighted.
<b>Newport</b>	070 – Land opposite Newport Playing Fields	2	See row below	See row below.

**Main Issues raised**

- This land should be protected as greenfield and should not be considered for any further development, it is inside the Conservation Area.
- It is situated within 100 years of the Nevern Estuary SSSI
- It is situated within 100 years of Ysgol Bro Inqli where children coming out of school and more traffic cause a danger
- Also situated near the skate park and rugby field
- It is a quiet country land where people walk in peace and quiet, not a good place for additional vehicles.
- Development would impact views from the north and east and views from the estuary have been protected for many years. Development would fly in the face of this policy and could encourage other applications of this nature.
- There is always contaminated run-off rain water from car parks.
  - Further traffic would exacerbate school traffic problems and negate safety measures recently taken.

<b>Community Council Area</b>	<b>Site number and location</b>	<b>Number of submissions received</b>	<b>Main issues raised</b>	<b>Response</b>
<p><b>Officer Response</b>  The Site Assessment does not recommend a specific land allocation or that the site should be included within the Centre boundary. Should a proposal for community facilities be proposed these will be considered under normal Development Management procedure. The provision of community facilities on the edge of centres is considered acceptable in principle, but will also be subject to detailed material planning considerations, including those raised in these submissions.</p>				
<b>Newport</b>	072 – Land off Ffordd Bedd Morris	1	This proposal would sacrifice a field which currently contributes to the beauty of the Newport environment.	Objection is noted. The Site Assessment agrees with this conclusion.
	096 – Cippin Stone	2	<ul style="list-style-type: none"> <li>▪ This proposal would sacrifice a field which currently contributes to the beauty of the Newport environment.</li> <li>▪ 096A – the northern section is not part of the campsite. It was purchased by a Trust to give the owners of neighbouring properties for access and privacy. Shortly after the camp site opened.</li> </ul>	See row below
<p><b>Response:</b> Whilst development of the whole site is considered unacceptable with regard to landscape impact concerns, landscape capacity is identified in the north west corner of the site. However highway constraints and the site's peripheral location in respect of the town centre has resulted in other sites taking priority for allocation. A subsequent response from the Landowner Trust which collectively owns the existing access to the north west of the site has added further reservations in respect of its deliverability. No further information from the proposer has been received. The site is not proposed for allocation or inclusion within the revised Centre boundary.</p>				
<b>Newport</b>	100 – Cotham Fields	1	This proposal would sacrifice a field which currently contributes to the beauty of the Newport environment.	Objection is noted. The Site Assessment agrees with this conclusion.

<b>Community Council Area</b>	<b>Site number and location</b>	<b>Number of submissions received</b>	<b>Main issues raised</b>	<b>Response</b>
<b>Newport</b>	141 – North of Feidr Eglwys	1	This proposal would sacrifice a field which currently contributes to the beauty of the Newport environment.	Objection is noted. However this site is a current allocation in the existing Local Development Plan (HA825) and has an extant planning permission for residential development. The landscape impact has therefore previously been considered acceptable.
<b>Saundersfoot</b>	015 – Sandyhill, Saundersfoot	1	<ul style="list-style-type: none"> <li>▪ A local developer has expressed interest in developing the site.</li> <li>▪ Consider that the site can be wholly delivered within the time frames of the emerging Plan.</li> <li>▪ Highway works can be undertaken to satisfy access arrangements for pedestrian and vehicular access.</li> <li>▪ Relocation of the power line has been agreed in principle with Western Power.</li> </ul>	The additional information provided has helped to demonstrate the landowner's intent to bring the site forward for development. An initial viability assessment shows that the site could accommodate the required level of affordable housing

<b>Community Council Area</b>	<b>Site number and location</b>	<b>Number of submissions received</b>	<b>Main issues raised</b>	<b>Response</b>
				provision.  Recommend that the conclusion to the site assessment is amended to show it would be compatible with the strategy of the Deposit Plan. <b>Amendment done.</b>
<b>Saundersfoot</b>	016 – Brooklands, Saundersfoot	1	Wish to withdraw the site from further consideration.	Noted.
<b>Saundersfoot</b>	017 – Brooklands, Saundersfoot	1	Wish to withdraw the site from further consideration.	Noted.
<b>Solva</b>	026 North of Maes y Forwen,	1	<ul style="list-style-type: none"> <li>▪ Development would constitute a rounding off of Solva and would be compatible with Park Purposes and Duty.</li> <li>▪ It would not break the skyline.</li> <li>▪ Biodiversity within the site could be enhanced as part of the development.</li> <li>▪ Sewage capacity issues have been ongoing for many years in Solva and technical alternatives are suggested to overcome the lack of capacity at the existing Sewage</li> </ul>	Comments are noted. The Authority maintains the view that the site would cause an unacceptable detrimental impact upon the landscape character of the area as outlined in the Site Assessment Potential improvements to biodiversity and alternative

<b>Community Council Area</b>	<b>Site number and location</b>	<b>Number of submissions received</b>	<b>Main issues raised</b>	<b>Response</b>
			Treatment Works.	sewage schemes, which have not been shown to be feasible, do not override the fundamental landscape concerns with the site.
<b>Solva</b>	111 – adjacent to Bro Dawel, Solva	2	<ul style="list-style-type: none"> <li>▪ The football field is an essential need for the community.</li> <li>▪ Development here would increase traffic congestion in an already busy area.</li> <li>▪ Other sites identified for development should be prioritised.</li> <li>▪ Landowner intends to bring the site forward for development.</li> <li>▪ Delivery of a replacement football field will only be achievable with a mix of market and affordable housing.</li> </ul>	See below
<p><b>Response:</b> The site is currently allocated for Housing in the current Local Development Plan. An agreement is in place between Pembrokeshire County Council (landowner) and the Community Council for the provision of recreational facilities should the site be developed. The Highways Authority has raised no objections on traffic safety grounds.</p> <p>The availability of other sites in Solva is limited, however it is not proposed to allocate this site or include it within the centre boundary.</p> <p>No new evidence has been provided to indicate the deliverability of the site has improved and subsequently change the Site Assessment conclusion. Any proposal for an affordable housing exception site would be considered on its merits.</p>				
<b>Stackpole</b>	114	1	<ul style="list-style-type: none"> <li>▪ Pembrokeshire County</li> </ul>	The school

<b>Community Council Area</b>	<b>Site number and location</b>	<b>Number of submissions received</b>	<b>Main issues raised</b>	<b>Response</b>
<b>and Castlemartin</b>	Stackpole VC School, Stackpole		<p>Council is concerned about the former school playing field being used for recreational purposes.</p> <ul style="list-style-type: none"> <li>▪ Who would manage/maintain the recreational area.</li> <li>▪ The County Council would prefer at least part of the playing field for be used for 100% affordable housing provision. The remainder should provide an amenity area for a housing scheme on the remaining school land.</li> <li>▪ The playing field is not currently available for amenity or recreational use for the wider community.</li> </ul>	closure will result in Stackpole being moved down a tier from Rural Centre to 'countryside' . Infill and rounding off opportunities will be permitted, where appropriate and also the conversion of buildings can be considered. The Open Space Assessment shows a requirement for additional pitch space and childrens' playground and this would need to be considered for any future housing developments.
<b>St Davids</b>	021 Glasfryn Road field nos. 8877, 8463, 9372), St Davids	1	Support the reallocation of the site.	Support noted. It is proposed to re-allocate the site for residential development.
<b>St Davids</b>	097 – Land adjacent to Ysgol Bro	4	See row below.	See row below.

<b>Community Council Area</b>	<b>Site number and location</b>	<b>Number of submissions received</b>	<b>Main issues raised</b>	<b>Response</b>
	Dewi, St Davids			

**Main Issues raised:**

- Development would impact on St Davids Conservation Area.
- There would be a negative impact on the landscape and views from surrounding properties.
- Sense of remoteness and tranquillity would be lost.
- Would impact on views from the Cathedral and Whitesands Road.
- Better to develop the land at Glasfryn Road.
- Development would be overlooking school with potential threat for children from new residents.
- Should be kept as agricultural land.
- Would impact on the character of Nun Street as a single line of older properties.
- Would increase light pollution to rear of the properties along Nun Street.
- Would increase traffic.
- Would impact on neighbouring Bed and Breakfast upgrading proposals.
- Would cause sewage and drainage problems.
- Would interfere with the City's relationship with its landscape.

**Response**

The Site Assessment considers that the site, which forms part of an existing allocation in the current Local Development Plan plus a north western extension, would not cause a significant detrimental landscape impact. No new evidence or considerations have been submitted to change this view.

The site is not proposed for re-allocation or inclusion within the centre boundary due to deliverability and access concerns. It is proposed to prioritise the existing allocation at Glasfryn Road (Site refs 021 and 099). The site is not identified as the best and most versatile land. Its loss would not therefore warrant safeguarding.

The impact of light pollution would be a detailed planning consideration at application stage and would vary according to the scheme proposed.

The impacts of traffic with regard to obtaining a suitable access point is raised as a concern in the Site Assessment. No new evidence is available to assess further.

No specific evidence is available to substantiate a perceived impact on neighbouring bed and breakfast business. This would not in itself be a valid material planning consideration.

Dwr Cymru has advised that sewage capacity exists for the current allocation. Non new evidence is available to assess further.

<b>Community Council Area</b>	<b>Site number and location</b>	<b>Number of submissions received</b>	<b>Main issues raised</b>	<b>Response</b>
<b>St Davids</b>	099 - Land West of Glasfryn Road), St Davids	1	Support the reallocation of the site.	Support noted. It is proposed to re-allocate the site for residential development.
<b>St Davids</b>	142 – Adjacent to Ysgol Bro Dewi, St Davids	4	See row below	See row below.

### **Main Issues raised:**

- Development would impact on St Davids Conservation Area.
- There would be a negative impact on the landscape and views from surrounding properties.
- Sense of remoteness and tranquillity would be lost.
- Would impact on views from the Cathedral and Whitesands Road.
- Better to develop the land at Glasfryn Road.
- Development would be overlooking school with potential threat for children from new residents.
- Should be kept as agricultural land.
- Would impact on the character of Nun Street as a single line of older properties.
- Would increase light pollution to rear of the properties along Nun Street.
- Would increase traffic.
- Would impact on neighbouring Bed and Breakfast upgrading proposals.
- Would cause sewage and drainage problems.

Would interfere with the City's relationship with its landscape.

### **Officer Response**

The Site Assessment considers that the site, which is an existing allocation in the current Local Development Plan, would not cause a significant detrimental impact upon the landscape or built character of St Davids. No new evidence or considerations have been submitted to change this view.

The site is not proposed for re-allocation or inclusion within the centre boundary due to deliverability and access concerns. It is proposed to prioritise the existing allocation at Glasfryn Road (Site refs 021 and 099). Any proposal as an exception site for affordable housing will be considered on its merits.

The site is not identified as the best and most versatile land. Its loss would not therefore warrant safeguarding.

<b>Community Council Area</b>	<b>Site number and location</b>	<b>Number of submissions received</b>	<b>Main issues raised</b>	<b>Response</b>
<p>The impact of light pollution would be a detailed planning consideration at application stage and would vary according to the scheme proposed.</p> <p>The Highways Authority has not objected on highway safety or congestion grounds, no new evidence is available to change this initial view.</p> <p>No specific evidence is available to substantiate a perceived impact on neighbouring bed and breakfast business. This would not in itself be a valid material planning consideration.</p> <p>Dwr Cymru has advised that sewage capacity exists for the current allocation. Non new evidence is available to assess further.</p>				
<b>St Ishmaels</b>	034 – Land off Trewarren Road, St Ishmaels	1	Additional supporting viability information is now available.	The Land Implementation Study, for which the submitted information advises, indicates that this site would not be financially viable to develop. It is not therefore proposed for re-allocation in the draft Deposit Local Development Plan on deliverability grounds.
<b>Tenby</b>	005 Waterwynch, Tenby	1	Is the marina proposal included in the Plan? If not, why not?	The proposal has been considered as a Candidate Site. It is a large-scale proposal without sufficient evidence to

<b>Community Council Area</b>	<b>Site number and location</b>	<b>Number of submissions received</b>	<b>Main issues raised</b>	<b>Response</b>
				support its inclusion in the Local Development Plan.
<b>Tenby</b>	001 – Francis Yard, Tenby	1	Following discussions with Pembrokeshire Housing Association the landowner has expressed disappointment with the expected return for developing the land for housing (including affordable housing) and wishes to continue offering the site in its current use for parking and lock-up garages.	Noted. The site is within the centre of Tenby and suitable, in principle, for redevelopment. It would not be allocated without support from the landowner and commitment to it being developed within the Plan period. No further assessment of this site will be made.
<b>Tenby</b>	079 – Land East of Old Narberth Road, Tenby	1	<ul style="list-style-type: none"> <li>▪ The sustainability credentials of the site have been underestimated by the National Park Authority.</li> <li>▪ The site can be accessed directly via Old Narberth Road (contrary to the Authority's assessment that it can only be accessed via Slippery Back).</li> <li>▪ Slippery Back provides direct access to a wide range of services and</li> </ul>	Old Narberth Road is referred to on the map base used by the Authority as Slippery Back and it is the length of road from the A478 to the site referred to in the assessment. The Highway Authority was consulted on the original

<b>Community Council Area</b>	<b>Site number and location</b>	<b>Number of submissions received</b>	<b>Main issues raised</b>	<b>Response</b>
			<p>facilities at Tenby town centre.</p> <ul style="list-style-type: none"> <li>▪ There is a lack of available brownfield sites for development in Tenby.</li> <li>▪ The impact of development at this site on the Special Qualities of the National Park is considered to be limited as it is well-screened from the wider landscape.</li> </ul>	Candidate Site submission and the advice given is included in the appraisal. Recommend no change to the assessment of this site.
<b>Tenby</b>	112 Brynhir, Tenby	4	See row below	See row below

- **Main Issues raised:** Large increase in houses would put undue strain on fragile infrastructure and roads and cause flooding.
- There is no demand for market houses.
- The model used for affordable housing provision is flawed and unworkable in depressed market conditions.
- Prefer to provide affordable housing through small-scale purchase of vacant/for sale properties.
- Development will cause visual impact from the coast, Caldey Island and the estuary.
- The necessary new road access will erode the green wedge and lead to additional pressure for roadside development.
- Site has steep slopes and extensive tree cover (including TPOs) and will be unviable.
- Site is habitat for protected species (foxes, badgers, birds of prey, slow-worms, toads and voles cited).
- Important hill fort (scheduled ancient monument) to the north.
- Important green space and informal recreational space in the town.
- Dog-walking visitors and locals will be displaced to the beaches creating a health risk.
- Camping and caravanning attractive for those who wish to bring pets – will be less attractive to them.
- Development has not been feasible for last 30 years – time to change the plan.
- Landowner disputes lack of commitment to developing the site and wishes the allocation to be retained.

The Town Council seeks certainty of deliverability of affordable housing on sites allocated in the Plan.

<b>Community Council Area</b>	<b>Site number and location</b>	<b>Number of submissions received</b>	<b>Main issues raised</b>	<b>Response</b>
<p><b>Response:</b></p> <p>The site has been allocated for residential development for many years, and its suitability for development regularly reviewed. On each occasion the Authority has consulted all relevant authorities and bodies to ensure the satisfactory development of the land. This includes liaison with Dwr Cymru/Welsh Water and Natural Resources Wales with specific reference to sewerage, drainage, water supplies and flooding. No objections have been raised.</p> <p>Whilst the site would be visible from various viewpoints it would be seen within the context of the rest of Tenby. Use of the land for informal recreation is acknowledged. Any public rights of way will be retained. Features, such as the hill fort will be protected. The green wedge to the north of Tenby in the current Local Development Plan is designated to control further development in this area, although a green wedge designation does not preclude all new development.</p> <p>Despite being allocated for residential development since the mid 1990's, no planning application nor pre-application enquiry has been made to develop any or part of the site. The site will not be reallocated in the Replacement Local Development Plan and will be excluded from the Centre boundary for Tenby. Proposals for its development may still be considered against the current Local Development Plan.</p>				
<b>Tenby</b>	113 – Butts Field Car Park, Tenby	1	Landowner is not intending to bring site forward due to displacement of parking but will seek mixed use development opportunities for the site.	<p>This is a brownfield site within Tenby. There is insufficient information to allocate the site for any specific use. Proposals emerging after Plan adoption will be considered against its generic policies.</p> <p>The site will not be re-allocated in the Replacement Local Development</p>

<b>Community Council Area</b>	<b>Site number and location</b>	<b>Number of submissions received</b>	<b>Main issues raised</b>	<b>Response</b>
				Plan.
<b>Tenby</b>	120 – Upper Cwm Park, Tenby	1	<ul style="list-style-type: none"> <li>▪ The site can be accessed directly via Old Narberth Road (contrary to the Authority's assessment that it can only be accessed via Slippery Back).</li> </ul>	Old Narberth Road is referred to on the map base used by the Authority as Slippery Back and it is the length of road from the A478 to the site referred to in the assessment. The Highway Authority was consulted on the original Candidate Site submission and the advice given is included in the appraisal.
<b>The Havens</b>	018 Land Opposite Heddfan, Little Haven	1	<ul style="list-style-type: none"> <li>▪ Landowner has clarified a number of points relating to the assessment –</li> <li>▪ Not all of the site is within the Conservation Area. A dwelling could be accommodated on the land outside the Conservation Area.</li> <li>▪ The site is regularly strimmed and was stripped this year for another reason.</li> <li>▪ It is not a tree-covered slope. The site is surrounded by mature trees and hedgebanks.</li> </ul>	See row below.

<b>Community Council Area</b>	<b>Site number and location</b>	<b>Number of submissions received</b>	<b>Main issues raised</b>	<b>Response</b>
<p><b>Response:</b> The assessment of the site as a tree-covered slope is considered to be accurate, although recent unauthorised development has resulted in loss of some tree cover. Development of the site would impact on the Conservation Area. Road safety concerns have been raised by the Highway Authority.</p>				
<b>The Havens</b>	027 Penberry, Little Haven	2	<ul style="list-style-type: none"> <li>▪ Land owner has clarified a number of points relating to the assessment –</li> <li>▪ Land is within the garden of an existing property;</li> <li>▪ Site can be developed without affecting tree roots.</li> <li>▪ Site is elevated above the flood risk area.</li> <li>▪ It is not woodland.</li> <li>▪ 3<sup>rd</sup> party agrees with the Officer assessment of the site.</li> </ul>	See row below
<p><b>Response:</b> Reference to the site being within the curtilage of an existing dwelling can be included within the assessment. The right of access across the neighbouring property has recently been considered by the Authority when an unauthorised roadway was created. A subsequent retrospective application for the works was refused planning permission. The refusal included the access being unsafe on highways grounds. The site is adjacent to a TAN15 Zone B flood risk zone as shown on the Natural Resources Wales Development Advice Map (2017). Whilst factual changes can be made to the assessment it does not alter the overall outcome that the site is not considered compatible with the Preferred Strategy of the Plan.</p>				
<b>The Havens</b>	040 Off Marine Road, Broad Haven	1	<ul style="list-style-type: none"> <li>▪ Landowner considers that satisfactory access can be achieved. Trafalgar Terrace is of a standard to cater for additional traffic movements.</li> </ul>	The response included in the site assessment relating to the site access was provided by the Highway Authority. The comments here

<b>Community Council Area</b>	<b>Site number and location</b>	<b>Number of submissions received</b>	<b>Main issues raised</b>	<b>Response</b>
				do not provide sufficient evidence to change the assessment.
<b>The Havens</b>	073 Land East of Walton Road, Broad Haven	1	<ul style="list-style-type: none"> <li>▪ The site would not impact on the landscape.</li> <li>▪ Additional planting has been proposed which reduces the developable area of the site.</li> <li>▪ Pedestrian access can be achieved.</li> </ul>	The additional information submitted does not change the outcome of the Candidate Site Assessment. Achieving pedestrian access from the site with planning permission to the village has proved to be problematical.

23. The full updated candidate site index and associated updated assessments has been uploaded on the Authority's website post the National Park Authority Meeting March 2018.

### Question 3 Sustainability Appraisal

24. 30 comments were received from 16 commentators on the Sustainability Appraisal.
25. The table below provides a list of main issues raised and how the Authority has responded.
26. The table below has three columns. Column 1 provides a reference from the Sustainability Appraisal. Column 2 summarises the issues and Column 3 sets out the Authority response.

<b>Sustainability Appraisal Reference</b>	<b>Issue</b>	<b>Response</b>
<b>Candidate site sustainability appraisal</b>	<b>Site 105 Adj Nyth y Wennol, Dinas Cross</b> - Candidate Site Submissions Form should have included a sustainability appraisal proforma.	The Authority has conducted a Sustainability Appraisal on all sites submitted, which formed part of the Preferred Strategy consultation. The Sustainability Appraisal is a related assessment highlighted in Section 7 of the Candidate Site Assessment Methodology Background Paper, which accompanied the submission form.
<b>Candidate site sustainability appraisal</b>	<b>Site 073 East of Walton Road, Broad Haven</b> –Change of Sustainability Appraisal scores and overall score in light of reduced landscape impact from a suitable scheme.	The additional information submitted does not change the outcome of the sustainability appraisal of the site.
<b>Candidate site sustainability appraisal</b>	<b>Site 018 Opposite Heddfan, Little Haven</b> – Changes to Sustainability Appraisal: <ul style="list-style-type: none"> <li>▪ Sustainability Appraisal</li> </ul>	The Authority has photographic evidence showing that the site is on a wooded slope, albeit that a number of trees

<b>Sustainability Appraisal Reference</b>	<b>Issue</b>	<b>Response</b>
	<p>Objective 3: Site is not wooded, and would not intrude on wooded valley</p> <ul style="list-style-type: none"> <li>▪ Sustainability Appraisal Objective 4: An additional 4 person household would provide an 8% increase in the number of residents taking part in physical recreation</li> <li>▪ Sustainability Appraisal Objective 8: An additional 4 person household would provide an 8% increase in the number of residents taking part in physical recreation</li> </ul>	<p>and shrubs have recently been removed by a third party to gain access to their property. This action was unauthorized and the Authority is taking enforcement action to rectify the matter. There is no direct link between a marginal increase in the number of residents and an increase in physical recreation.</p>
<b>Candidate site sustainability appraisal</b>	<p><b>Site 027 Penberry, Little Haven</b> - Changes to Sustainability Appraisal:</p> <ul style="list-style-type: none"> <li>▪ Sustainability Appraisal Objective 3: Site is not woodland is part of steeply sloping garden.</li> <li>▪ Sustainability Appraisal Objective 4: An additional 4 person household would provide an 8% increase in the number of residents taking part in physical recreation</li> <li>▪ Sustainability Appraisal Objective 8: An additional 4 person household would provide an 8% increase in the number of residents taking part in physical recreation</li> </ul>	<p>Reference to the site being within the curtilage of an existing dwelling can be included within the assessment. There is no direct link between a marginal increase in the number of residents and an increase in physical recreation.</p>
<b>Candidate site sustainability appraisal</b>	<p><b>Site 124 East of Tower Hill, Dinas Cross</b> – Changes to Sustainability Appraisal:</p> <ul style="list-style-type: none"> <li>▪ Sustainability Appraisal Objective 2: The site is located</li> </ul>	<p>It is not proposed to allocate the site for housing development due to concerns over its deliverability, the site is</p>

<b>Sustainability Appraisal Reference</b>	<b>Issue</b>	<b>Response</b>
	<p>too far from the centre of Dinas Cross to minimise the demand for travel</p> <ul style="list-style-type: none"> <li>▪ Sustainability Appraisal Objective 3: Site should be retained as a green wedge as it would have an unacceptable impact on landscape character</li> <li>▪ Sustainability Appraisal Objectives 4/5 Incorrect. Visitors will not be willing to rent the holiday accommodation in the area. The majority of residents do not walk along the coastal path</li> <li>▪ Sustainability Appraisal Objective 6: Surface water run-off will definitely increase. The land is not permeable.</li> <li>▪ Sustainability Appraisal Objective 8: Affordable housing should be in the village centre, where there is close access to facilities. Existing facilities do not include a school or GP. There is little employment.</li> <li>▪ Sustainability Appraisal Objective 13: Housing development would not help to support existing community facilities. The GP centres in Newport and Fishguard are overstretched.</li> <li>▪ Sustainability Appraisal Objective 14: biodiversity impacts could not be mitigated and certainly couldn't be enhanced</li> <li>▪ Sustainability Appraisal Objective 15 Development</li> </ul>	<p>not included within the revised Centre boundary for Dinas Cross although any proposal for an affordable housing exception site will be considered on its merits.</p> <p>2. The site is currently located adjacent to the existing Centre Boundary for Dinas Cross and is as such considered to be located within a sustainable location for the purposes of the Local Development Plan. The Highways Authority has advised that highway improvements will be required as part of any scheme for development.</p> <p>3. The Settlement Capacity Study (2014) identified this site as having landscape capacity for residential development, subsequent Officer site visits and consideration confirmed this view. To maintain a Green Wedge status in the replacement plan would therefore be contrary to this view.</p> <p>4/5. Comments are noted. Commentary has been amended in No. 5 of the Sustainability</p>

<b>Sustainability Appraisal Reference</b>	<b>Issue</b>	<b>Response</b>
	<p>could not enhance the quality of inland and coastal waters as drainage of the land and sewage capacity in inadequate.</p> <ul style="list-style-type: none"> <li>▪ Overall negative impacts will arise from this site.</li> </ul>	<p>Appraisal for site 124.</p> <p>6. Dwr Cymru has been consulted and has not objected to development of the site in principle.</p> <p>8. The site is currently located adjacent to the existing Centre Boundary for Dinas Cross and is as such considered to be located within a sustainable location for the purposes of the Local Development Plan.</p> <p>13. Additional housing development is considered to strengthen the need for the provision and improvement of community facilities in the area.</p> <p>14. Any proposed development found to cause an unacceptable detrimental impact upon biodiversity levels would not be supported by the draft Deposit Local Development Plan.</p> <p>15. Any proposed development found to cause an unacceptable detrimental impact upon the quality of inland and coastal waters would not be supported by the draft</p>

<b>Sustainability Appraisal Reference</b>	<b>Issue</b>	<b>Response</b>
		Deposit Local Development Plan.
<b>Wales Spatial Plan</b>	Remove references to the Wales Spatial Plan as it will be superseded by the National Development Framework.	The Spatial Plan remains relevant as set out in the Local Development Plan Manual.
<b>Options</b>	Consider a further option for retail in <b>Tenby</b> to extent the Primary Retail Frontage.	This option has been considered and it is proposed to extend the Primary Retail Frontage to include the West side of Upper Frog Street. Extending beyond this point is considered to undermine the policy objective of maintaining a clear core retail centre. The Retail Background Paper has been updated to explain this consideration. <b>Amendment to the Proposals Map.</b>
<b>Sustainability issues</b>	<b>Future of the built environment:</b> It seems unlikely that there will be allocations for employment developments in the Replacement National Park LDP.	Noted
<b>Sustainability issues</b>	<b>Demand for minerals:</b> “current working quarries are reaching the end of their lives” could be more specific as some minerals permissions in the National Park have quite a few years before permission runs out.	Agree, additional text to clarify the end dates of permissions is needed. <b>Amendment done.</b>
<b>Policy Options</b>	<b>Policies 1-6:</b> Reference is made to minerals and waste but these	The usage of materials is implicit in any

<b>Sustainability Appraisal Reference</b>	<b>Issue</b>	<b>Response</b>
	policies are not particularly closely related to these issues.	development, as is the creation of waste.
<b>Policy Options</b>	<b>Policy 29:</b> Options that require more than what is required in Building Regulations may impact on development viability and therefore the provision of affordable housing.	Agreed.
<b>Policy Appraisal</b>	<b>Policy 34</b> – not all development had to be directed away from areas of flooding and coastal inundation. Less vulnerable types of development may be possible.	Agree that a distinction can be made between highly vulnerable and less vulnerable developments in the Plan. <b>Amendment done.</b>

## Question 4: Equality Impact Assessment

27. A total of 21 comments were received on the Equality Impact Assessment from 15 commentators. Below are the main issues from the Pre-Deposit Consultation and how the Authority has responded.
28. The table below has three columns. Column 1 provides a reference from the Equalities Impact Assessment. Column 2 summarises the issues and Column 3 sets out the Authority response.

<b>Reference</b>	<b>Issue</b>	<b>Response</b>
<b>Gypsy Travellers</b>	Re-word <b>Policy 46</b> to include travelling show-people.	Agree to amending title. <b>Amendment done.</b>
<b>Welsh Language</b>	Decline in Welsh language between 2001 and 2011 censuses	This is a factual statistic. The sustainability appraisal of the Plan and sites and the inclusion of Policy 12 seek to protect the Welsh language. Other means of promoting the Welsh language are outside the remit of land use planning.
<b>Disability</b>	Consistent with our answer in relation to Question 1, the City Council remains concerned about the lack of suitable parking and toilet facilities at <b>St Justinians</b> and in relation to Question 4 and the Equality Impact Assessment, how people who are protected under the Equality Act 2010 can have appropriate and necessary facilities in the St Justinians area.	Limited parking is available at St Justinians. A long-term solution to the issue is sought and this will include the need to cater for motorists and other visitors with disabilities. The Authority has allowed temporary permissions for public toilets. No applications for permanent facilities have been submitted. Should proposals be submitted they would be considered against the generic policies of the Plan.

## New or Amended Sites submitted List

29. Set out below is the Authority's Summary Response to new or amended sites submitted as part of the Preferred Strategy consultation. The full index can be found on the [website \(for the National Park Authority March 2018\)](#).
30. 16 proposals were submitted by 28 representors.
31. The table below has four columns. Column 1 advises which Community Council the site is in (in alphabetical order), Column 2 provides a site number, Column 3 a site address and Column 4 advises what use is proposed. The final column shows the assessment conclusion of whether the site and proposal are compatible with the Preferred Strategy.

<b>Compatible</b>	
<b>More assessment/ information required</b>	
<b>Not compatible</b>	

<b>Location (Community Council)</b>	<b>Site Number</b>	<b>Address</b>	<b>Proposed Use</b>	<b>Assessment outcome to date (Oct 2017)</b>
<b>Dinas Cross</b>	300	North of A487 Tyrhos land	Local community development for young and elderly	
<b>Dinas Cross</b>	301	Adj Maes y Ffynnon, extending to The Cross	Housing	
<b>Dinas Cross</b>	302	Opp Maes y Ffynnon, extending to The Cross	Housing	
<b>Dinas Cross</b>	303	Site 124 East of Tower Hill, Dinas Cross	Green Wedge	

<b>Location (Community Council)</b>	<b>Site Number</b>	<b>Address</b>	<b>Proposed Use</b>	<b>Assessment outcome to date  (Oct 2017)</b>
<b>Llanrhian</b>	308	Field 1728 adj Temple House, Square & Compass	Housing	Affordable housing exception site
<b>Marloes and St Brides</b>	313	Marloes Court Farm	Housing	
<b>Saundersfoot</b>	304	Garden, Tower Field Lodge, Valley Road, Saundersfoot	Housing	
<b>Stackpole and Castlemartin</b>	305	West Farm Yard, Castlemartin	Housing etc	
				Part of site
<b>St Davids</b>	314	Site 099 adj Glasfryn Road, St Davids	Mixed Use	
<b>St Davids</b>	315	Site 021 Glasfryn Road field St Davids	Mixed Use	
<b>The Havens</b>	307	Land to south of existing allocation HA734, Walton Road, Broad Haven	Housing	
<b>The Havens</b>	309	Bower Farm, Site D, Broad Haven	Housing	
<b>The Havens</b>	310	Bower Farm, Site C, Broad Haven	Housing	
<b>The Havens</b>	311	Bower Farm, Site B, Broad Haven	Housing	

<b>Location (Community Council)</b>	<b>Site Number</b>	<b>Address</b>	<b>Proposed Use</b>	<b>Assessment outcome to date  (Oct 2017)</b>
<b>The Havens</b>	312	Bower Farm, Site A, Broad Haven	Housing	

## Deposit Plan

32. A total of 265 comments were received from ~~406~~ 105 (error noted 29/01/19) representors. This includes 2 petitions. The main issues raised are responded to below in Plan order.

<b>Housing Provision in Tenby and its relationship with Saundersfoot</b>	
LDP Section references	<p>Chapter 3 Vision Paragraph 3.4 Location for new development, page 15 Chapter 4 Spatial Strategy</p> <p>Tenby: Tenby by 2031 Paragraph 4.28</p> <p>Tenby Policy 2 Tenby Local Service and Tourism Centre (Tier 2) (Strategy Policy) page 27 Chapter 41 Spatial Strategy</p> <p>Chapter 4E Affordable Housing and Housing Tenby - Paragraph 4.266 Page 109</p> <p>Saundersfoot LDP HA04/HA05/HA06 (Sites 031 &amp; 031A)Page 113 Map C35</p> <p>Policy 48 Housing Allocations Page 113</p> <p>Candidate Site Register – Tenby sites</p> <p>Candidate Site 112 Brynhir</p>
<p>Representors</p> <p><b>(Bold type</b> identifies which representors have requested to be heard.)</p>	<p><b>2708/7</b> <b>2708/20</b> <b>2708/21</b> <b>2708/135</b> 2916/154 <b>2708/155</b> <b>2708/156</b> <b>2708/157</b> 3813/245 4600/246 4646/247 <b>2906/251</b></p>
Relevant content of the LDP to which the main issue relates	The role of Tenby in providing housing in the Plan area and the identification of housing sites.
LPA's summary of the deposit	<b>Tenby has no housing allocations</b> , in spite of being the NP settlement that is likely to score highest in terms of the

representation(s)	<p>services, amenities and public transport. Relying on de-allocated sites to deliver housing for Tenby is not a sound approach and will not ensure housing delivery.</p> <p>The Authority should clarify why the <b>potential sites</b> identified in Tenby through the Settlement Capacity Study have not been taken forward as allocations; given it is the most sustainable settlement.</p> <p>The vision for Tenby includes a statement saying that 'new housing developed in the town contains a substantial element of affordable housing'. However, in the absence of a housing allocation in Tenby, the future provision of market and affordable housing could be of a modest scale and might not meet identified needs.</p> <p>Allocate Brynhir Candidate Site to achieve a 5 year effectively available land supply. Historically this site had not been brought forward by PCC due to the level of affordable housing required on the site.</p> <p><b>Development at Saundersfoot is inappropriate develop Brynhir Tenby instead.</b></p> <p><b>Support the non-allocation of Brynhir</b> for housing.</p>
Changes sought by those submitting representations	<p>Clarify why potential sites identified through the Settlement Capacity Study have not been taken forward.</p> <p>Allocate Brynhir Tenby, Candidate Site 112 for housing development. Some commentators wish to see Brynhir developed instead of sites at Saundersfoot.</p> <p>(Note there is also support for the non-allocation of the Brynhir Candidate Site for housing.)</p>
<b>LPA's recommendations, including reasons</b>	<ol style="list-style-type: none"> <li>1. Agree Tenby is a 'Centre' location which, in principle could support additional housing for all the reasons set out in the submission by the Pembrokeshire County Council.</li> <li>2. However, the Local Development Plan is required to meet all the tests of soundness and the Authority has major concerns regarding the deliverability of the Brynhir site proposed and owned by the County Council – see Site Assessment for CS 112, Brynhir Tenby – Test 3 – will the</li> </ol>

	<p>plan deliver?</p> <ol style="list-style-type: none"> <li>3. With the history of allocation being within the planning system for over 30 years this site still remains undeveloped, not only undeveloped but with no history of planning applications or inclination to develop. A previous non statutory plan followed by the first local plan adopted in 1998, a joint unitary development plan adopted 2006 and the first Local Development Plan adopted 2010 has not seen Brynhir come forward for residential development.</li> <li>4. The de-allocation of the site within this replacement Local Development Plan seems to be providing some impetus to the landowner (County Council) to act. The text of the Plan describes what is anticipated. The Authority could not, given the evidence needed to be provided, allocate the Brynhir site and achieve compliance with Test 3 -Will the plan deliver?</li> <li>5. Since the Plan was placed on Deposit, National Park Authority Officers have been advised by the Private Sector Housing &amp; Housing Strategy Manager for Pembrokeshire County Council (Fri 28/09/2018)</li> <li>6. <i>'I can confirm that at the July Cabinet meeting approval was given to appropriate the land at Brynhir from the Council's General Fund to the Housing Revenue Account. Approval was also given to draft and submit an outline planning application and to design and construct an access road and the utility infrastructure.'</i></li> <li>7. <i>'To take this forward a programme board is being established to oversee the council housing development on this site and others. Following yesterday's meeting on sustainable drainage, there is clearly going to be a lot of work needed on this issue prior to a layout being finalised. I will be encouraging the programme board to focus on this issue in the first instance given the potential impact it has on what the final scheme may look like.'</i></li> <li>8. This is encouraging but has no immediate timescales attached to it. In discussions the Private Sector Housing &amp; Housing Strategy Manager for Pembrokeshire County Council is intending to feedback on further progress</li> </ol>
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	<p>regarding delivery.</p> <p>9. The County Council has also advised in its Deposit submission that it intends to appear at Examination on this matter at which time there may be further advice to inform the discussion regarding timetables for delivery and explaining when and how the site is intended to come forward.</p> <p>10. Information available is the Candidate Site Assessment on the Candidate Site Register, the Sustainability Appraisal for the site, the Habitats Regulations Assessment and the advice contained in the Land Implementation Study.</p> <p>11. <b>Other sites:</b> The Candidate Site Register provides an assessment of each site proposed in Tenby. Twelve sites in Tenby were identified in the Settlement Capacity Study. Four of the sites identified were not assessed further as they were already ear-marked for other developments, the landowners had already indicated that they intended to use the sites for other purposes or it was clear that access into the site would not be achievable. One of the sites identified was outside the National Park's area of planning jurisdiction. The remaining 8 sites were assessed as Candidate Sites, some of which were also submitted for consideration by the landowners themselves. In terms of all sites assessed for Tenby no other sites submitted were considered appropriate.</p> <p>12. With regard to the statement in the <b>vision</b> for Tenby by 2031 which states that 'new housing developed in the town contains a substantial element of affordable housing', the term refers to the expectations for affordable housing provision in any individual development proposed. It would apply to windfall sites as well – Test 2.</p> <p>13. With regard to the preference for development in <b>Tenby rather than Saundersfoot</b> growth is distributed through the National Park Centres primarily, where suitable and deliverable sites have been submitted for consideration. The level of provision of new development in the Centres is commensurate with their size and ability to absorb the growth, without harming the special</p>
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	<p>qualities of the National Park.</p> <p>14. Sites within the National Park submitted for consideration as a Candidate Site have been assessed within that strategic context, and allocated where they are considered to be appropriate for development.</p> <p>15. The <b>concerns raised</b> regarding the development of <b>land at Brynhir</b> are noted. The Authority's candidate site appraisal reflects the Authority's view on the principle of the site's development. Issues that remain are in terms of deliverability matters.</p> <p>16. Information available is the Candidate Site Assessment on the Candidate Site Register, the Sustainability Appraisal for the site, the Habitats Regulations Assessment and the advice contained in the Land Implementation Study.</p> <p><b>Conclusion:</b> Await further advice and discussion regarding Brynhir, Tenby which remains allocated in the current Local Development Plan (adopted 2010) until superseded by the replacement Local Development Plan.</p>
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<b>Should all new dwellings in Newport be a ‘principal residence’?</b>	
LDP Section references	Chapter 4 Spatial Strategy Newport Policy 3a) LDP2 Deposit Version 4.31 C29 Newport Trefdraeth
Representors <b>(Bold type</b> identifies which representors have requested to be heard.)	<b>3778/23</b>
Relevant content of the LDP to which the main issue relates	The manner in which occupancy is controlled in new development in Newport.
LPA’s summary of the deposit representation(s)	NAEG seeks modification of LDP2 Policy 3a) - detailed re-wording is provided relating to the control of dwellings to be occupied as a principal resident. Detailed rewording of the text for Newport in the Plan is also provided.
Changes sought by those submitting representations	Control new dwellings so they are occupied as principal residences. Detailed re-wording of the section on Newport requested.
<b>LPA’s recommendations, including reasons</b>	<ol style="list-style-type: none"> <li>1. The issue of occupancy controls could usefully be discussed at Examination particularly given recent developments at Swansea’s Local Development Plan Examination and the previous outcomes of the Anglesey and Gwynedd Local Development Plan.</li> <li>2. Additional references have been added to the Housing Background Paper (Updated November 2018 ) in respect of these Plans.</li> <li>3. A submission regarding principal residences at Preferred Strategy Stage was considered as an additional housing option, (see Alternative Options &amp; Appraisal Background Paper (March 2018), and this has not resulted in it becoming the preferred housing option for the Plan. This assessment was on the basis of a Park wide application of the Policy.</li> <li>4. 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</li> </ol>

	<p>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. These concerns remain whether such a policy was applied widely or in a localised situation. If localised then what would be the justification?</p> <ol style="list-style-type: none"> <li>5. The Alternative Options &amp; Appraisal Background Paper (March 2018) provides more advice.</li> <li>6. 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. Substantive amounts of affordable housing are required. The reference to a 'FOAN' document is not familiar one in Welsh planning policy terms.</li> <li>7. 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. A table has been provided by the Authority to the representor from Census data and it is understood that Pembrokeshire County Council has also provided Council Tax data.</li> <li>8. 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 – see paragraph 9.2.14 and the last sentence of paragraph 9.2.16 of Planning Policy Wales Edition 9 November 2018. Delivering affordable housing is a key objective for the Authority. On balance the achievement of affordable housing is seen as the preferred option.</li> <li>9. In terms of other points raised the outcomes of engagement manifest themselves in the consultation material published at formal stages of Plan preparation.</li> </ol>
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	<p>There have been engagement events in Newport both with the Town Council and also in conjunction with other interested parties. Officers were not aware that specific feedback to NAEG was anticipated in addition to the formally approved response by the Authority (of which all representors were notified).</p> <p>10. The Scale and Location of Growth Background Paper (Updated March 2018) has tables removed because the Authority had a separate commission done regarding population projections and it was considered it would lead to confusion to have two sources for figures.</p> <p>11. The current wording of the text for Newport in the Local Development Plan is considered to be adequate and results from consideration of detailed comments mainly prior to publishing the Preferred Strategy. The Inspector's views are welcomed.</p> <p><b>Conclusion:</b> Disagree.</p>
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<b>The number of Green Wedges shown on the Proposals Map</b>	
LDP Section references	Chapter 4A Special Qualities Open Space & Green Wedges Policy 17: Green Wedges Proposals Map
Representors <b>(Bold type</b> identifies which representors have requested to be heard.)	1569/60
Relevant content of the LDP to which the main issue relates	Proposals Map where Green Wedges are shown.
LPA's summary of the deposit representation(s)	The number and scale of green wedges (41 in total) is excessive, especially in the context of a National Park. The evidence base does not adequately explain or justify in many cases how green wedges have been designated in line with PPW (para 4.8.3, 4.8.11).
Changes sought by those submitting representations	Reduce the number of Green Wedges shown.
<b>LPA's recommendations, including reasons</b>	<ol style="list-style-type: none"> <li>1. It is unclear from this representation which of the designated Green Wedges are considered to be inappropriate or unjustified.</li> <li>2. The Authority has re-assessed each Green Wedge in response to Welsh Government comments at Preferred Strategy stage, which resulted in the removal or reduction of a small number of Green Wedges and the updating of justifications where considered necessary (see Green Wedge Background Paper March 2018).</li> <li>3. The Authority considers the remaining designations to be appropriate, to aid the Authority in pursuing its statutory purpose to conserve and enhance the National Park landscape. Test 2</li> </ol> <p><b>Conclusion:</b> Disagree.</p>

<b>Policy 34 Renewable Energy: refer to different scales of development as set out in Planning Policy Wales</b>	
LDP Section references	Policy 34 Renewable Energy
Representors <b>(Bold type identifies which representors have requested to be heard.)</b>	1569/87
Relevant content of the LDP to which the main issue relates	Policy 34 Renewable Energy and reasoned justification.
LPA's summary of the deposit representation(s)	Policy 34 should be amended to refer to the different scales of renewable energy development (PPW, Figure 12.2) and make clear how the Authority would determine applications for each scale, in line with national policy (PPW, paragraph 12.8.14) and the Authority's Renewable Energy Assessment (REA). The target contribution of 49GWh should be included in the reasoned justification and reflected in the monitoring framework.
Changes sought by those submitting representations	See row above.
<b>LPA's recommendations, including reasons</b>	<ol style="list-style-type: none"> <li>1. Justification for retaining a Renewable Energy policy with locally defined scales is provided within the reasoned justification for Policy 34 Renewable Energy (Strategy Policy). The scope within each of the nationally defined scales within Planning Policy Wales is considered to be too large and unreflective of the real potential landscape and generation capacity within the Park. This is particularly relevant at 'Sub Local Authority' scale for which potential at the lower end of this scale is identified within the Renewable Energy Assessment. The necessary caveats that would subsequently be required within the policy to curtail development at the higher end of this scale could unintentionally stifle development in the future. For example, where technological advances allow greater generational capacity at lower visual impact scales.</li> <li>2. With regard to including the 49GWh target, this is included in the monitoring framework via Indicators 12 and 13 within Chapter 5 of the Deposit Local Development Plan.</li> <li>3. The Authority welcomes the Inspector's view on the need</li> </ol>

	<p>to include this target within the reasoned justification particularly as the targets are heavily caveated.</p> <p><b>Conclusion:</b> Disagree with regard to including scales defined within Planning Policy Wales and needing to further reflect the generation target within the monitoring framework.</p>
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<b>Housing: The Plan must contain consistent and robust information to demonstrate delivery of the housing requirement (Housing Provision, Flexibility, Windfalls, Future Growth)</b>	
LDP Section references	Chapter 4E Affordable Housing and Housing. Policy 47 Housing Provision Policy 48 Housing Allocations Tables 5 and 6 Components of Housing/Affordable Housing Land Supply – Windfall allowance Table 8 Potential Large Windfalls Table 7 Future Growth Areas – HA5 and HA11
Representors <b>(Bold type</b> identifies which representors have requested to be heard.)	1569/128 1569/129 1569/130 1569/132 2025/137 2025/139
Relevant content of the LDP to which the main issue relates	Policy 48 Housing Allocations Tables 5 and 6 Components of Housing/Affordable Housing Land Supply – Windfall allowance Table 8 Potential Large Windfalls Table 7 Future Growth Areas – HA5 and HA11
LPA’s summary of the deposit representation(s)	<p><b>Components of Supply</b></p> <ol style="list-style-type: none"> <li>1. The Authority appears to have counted units <b>beyond the plan period</b> in the housing provision which is inappropriate.</li> <li>2. <b>Table 5: Section C: Units with Planning Permission</b> - The HBF question why only a discount of 25%, how does this relate to the level of housing shown with the five year land supply in the JHLAS. Using the 2016 JHLAS there is a high non-delivery rate under the current Local Development Plan.</li> <li>3. <b>Table 5 Section E Large Windfalls and Section F Small Windfalls</b> - The HBF objects to the level of windfalls with small and large equalling 450 units which is 39% of housing provision, this is consider to be an overreliance on which both an unknown and also something which is not an everlasting supply.</li> </ol>

	<p>- The Authority needs to justify the 'large windfall' rate of 21p/a, including why a 40% discount has been applied in Tenby. The evidence is not clear in this respect and requires clarification.</p> <p>4. The <b>contingency/ flexibility level</b> appears to calculate at 16% this should be clarified as elsewhere in the document a figure of 10% is used – <b>Policy 47.</b></p> <p>5. <b>Table 7: Housing Allocation Requirements: Future growth areas</b> - HA5 and HA11 should be allocated in totality and included within the settlement boundary to ensure comprehensive development occurs.</p> <p>6. <b>Table 8 Potential for Large Windfall Sites:</b> The HBF notes that Table 8 under Policy 48 identifies a number of windfall sites three of which are described as having deliverability issues. This supports HBF's concerns about the plans overreliance on windfall sites.</p> <p>7. The HBF questions the need for and the benefit of <b>Table 7 and 8</b> and suggests that they should be an appendix instead.</p> <p>8. <b>Appendix 2 Housing Background Paper:</b> It is also unclear why some <b>'de-allocated' sites</b> outside boundaries are included within the windfall rates. Sites outside settlement boundaries should not be included as windfall and should be removed.</p>
Changes sought by those submitting representations	Further justification clarification required regarding housing provision and flexibility, windfall allowances and future growth areas.
<b>LPA's recommendations, including reasons</b>	<p>1. Agree. The figures have been adjusted in Tables 5 and 6 of the Local Development Plan and supporting Housing Background Paper to <b>exclude units that are likely to be built out beyond the Plan period.</b> A Focussed Change is proposed.</p> <p>2. <b>Land with planning permission</b> has been amended to reflect only the anticipated provision for 5+ sites with planning permission reflecting the Joint Housing Land Availability Study 2018. A Focussed</p>

	<p>Change is proposed.</p> <ol style="list-style-type: none"> <li>3. The <b>windfall provision</b> has been amended to reflect historic development patterns and the findings of the Joint Housing Land Availability Study for small site provisions – See Appendix 4 to the Housing Background Paper for more detail. Adjustments have been made to ensure no double counting with land with planning permission. A Focussed Change is proposed.</li> <li>4. <b>Contingency:</b> Appendix 3 to the Housing Background Paper illustrates the impact of a 15% contingency figure. A Focussed Change is also proposed to paragraph 4.262 of the Local Development Plan.</li> <li>5. <b>Future growth areas:</b> Agree. Arrows are proposed for deletion on the Proposals Map and reference to them in Table 7 as a Focussed Change.</li> <li>6. <b>Table 8:</b> These sites have not been specifically counted as part of the provision figures for windfall sites but may contribute to windfall provision figures if they come forward.</li> <li>7. Table 7 and 8 in the Plan text: The inclusion of these Tables 7 and 8 of the Local Development Plan arose from the need to comply with the recommendations from the Habitats Regulations Assessment.</li> </ol> <p>It also provided an opportunity to highlight unique site matters the Authority wished to highlight.</p> <p>A Local Development Plan must contain a reasoned justification of the policies contained in it. Planning and Compulsory Purchase Act 2004 Part 3 11(2).</p> <p>The status of appendices appears to be more questionable.</p> <p>Part of the Plan is the policy and part of the Plan is an explanation of the policy.</p> <p>Also in practical terms having the tables there put these issues at the forefront of developers' minds. If in an appendix these issues are missed and not factored into design and layout from the outset rather than being an</p>
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	<p>afterthought. It is imperative we set out these limitations/opportunities at the outset so for example developers are aware of sensitivities of hedgerows or proximity of designated sites. No change in approach is proposed.</p> <p>8. <b>De-allocated sites:</b> Agree these have been taken out of the figures in Appendix 2 to the Housing Background Paper.</p>
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<b>Housing: The Plan must contain consistent and robust information to demonstrate delivery of the housing requirement(5 Year Land Supply)</b>	
LDP Section references	Chapter 4E Affordable Housing and Housing: Demonstrating a 5 Year Supply
Representors <b>(Bold type</b> identifies which representors have requested to be heard.)	1569/128 1569/129 1569/130 1569/131 1569/132
Relevant content of the LDP to which the main issue relates	5 Year Housing Land Supply – Housing Background Paper Appendix 2 and 3.
LPA’s summary of the deposit representation(s)	<ol style="list-style-type: none"> <li><b>5 Year Housing Land Supply</b> - There are inaccuracies that require amendment:  Housing land supply (Appendix 3 of the Housing Background Paper) requires amendment to ensure it reflects the housing requirement rather than the overall provision.  The land supply figures for the plan needs to be recalculated to ensure a 5 year supply at adoption and throughout the plan period.</li> <li><b>Land bank sites</b> – it is also unclear where sites with planning permission are factored into the phasing in Appendix 3 and the graph. The Authority should confirm there is no double counting with the windfall rates on this basis.</li> </ol>
Changes sought by those submitting representations	Further justification clarification required regarding housing provision and flexibility, windfall allowances, 5 year housing land supply, and future growth areas.
<b>LPA’s recommendations, including reasons</b>	<ol style="list-style-type: none"> <li><b>5 Year Housing Land Supply:</b> Amendments have been made to Appendix 2 and 3 of the Housing Background Paper which resolves this issue.</li> <li>The <b>role of planning permission sites</b> (which is understood to be referred to as ‘land bank’ sites in the comment) has also been clarified – see Appendix 2, 3 and 4 of the Housing Background Paper. Focussed Changes are proposed to Table 5 and 6 of the Local Development Plan.</li> </ol>

<b>Housing: The Plan must contain consistent and robust information to demonstrate delivery of the housing requirement (viability, affordable housing targets)</b>	
LDP Section references	Chapter 4E Affordable Housing and Housing Affordable Housing Viability Study Policy 48 Housing Allocations Policy 49 Affordable Housing Target Tables 5 and 6 Housing/Affordable Housing Land Supply – Appendix 2 and 3 Housing Background Paper
Representors <b>(Bold type</b> identifies which representors have requested to be heard.)	<b>2025/126</b> <b>2708/166</b> 1569/167 1569/168
Relevant content of the LDP to which the main issue relates	The calculation of affordable housing figures, site infrastructure costs, affordable housing targets and the wording of the affordable housing policy.
LPA's summary of the deposit representation(s)	<ol style="list-style-type: none"> <li>1. <b>The Affordable Housing Viability Study</b> does not allow for the cost of sprinklers and the figures used in Policy 48 do not reflect conclusions reached in the Affordable Housing Viability Study.</li> <li>2. <b>The affordable housing percentages set out in Policy 49 are higher than for the PCC Plan area</b>, including for split settlements. Issues are raised in terms of sprinkler costs, whether land values identified are perhaps too high in certain locations (e.g. Tenby, the north area), whether the Build Costs used pick up on the fact that smaller sites often cost more to deliver. Have the implications of Brexit been considered.</li> <li>3. There are inconsistencies <b>between the high level and site specific viability assessment which need clarification in relation to sprinklers, site specific works including 'abnormals'</b>.</li> <li>4. <b>Policy 49:</b> The policy needs to identify the affordable housing target (250 – Policy 49 - or 273 – Table 6) with specific targets for each sub area.</li> </ol>

	<p>5. In addition, to align with case law and PPW (paragraph 9.2.19) <b>the policy must include an element of flexibility /viability</b> and include reference to negotiation on a site by sites basis.</p>
Changes sought by those submitting representations	Further justification/clarification required regarding the affordable housing target, deliverability of sites, affordable housing viability.
<b>LPA's recommendations, including reasons</b>	<ol style="list-style-type: none"> <li>1. The inclusion of <b>sprinkler costs</b> is explored in Appendix 4 of the Housing Background Paper and focussed changes are proposed to Policies 48 and 49 and Tables 6 and 9.</li> <li>2. <b>Comparing with Pembrokeshire County Council's Local Development Plan assumption:</b> This Authority has prepared an Appendix 4 to the Housing Background Paper which compares approaches and assumptions used for viability which should help the debate in Examination. Regarding build costs the toolkit used for the Affordable Housing Study does not distinguish between size of site. Smaller sites have a higher build cost per square metre for 1– 3 units size sites (BCIS figures) but don't have the potential planning obligation costs (other than an affordable housing contribution which is subject to viability assessment). In terms of Brexit there is uncertainty as to the outcomes and it is difficult to pinpoint definitive evidence as to what the implications will be for Plan preparation.</li> <li>3. <b>Affordable Housing Requirements in Table 9 'versus' Requirements in Policy 48:</b> More detail is provided in Appendix 4 of the Housing Background Paper regarding the assumptions and approach used at strategic level and for individual allocations which should aid discussion at Examination.</li> <li>4. <b>Affordable Housing Target:</b> An explanatory note can be inserted in the reasoned justification to Policy 48 as a Focussed Change to advise the reason why the target is 250 rather than the total given in Table 6 – this is to take account of the need for a flexibility allowance and the need to negotiate on a site by site basis. The need for breakdown the target by market area is queried.</li> </ol>

	<p>5. Text regarding <b>‘seeking to negotiate’</b> is contained within the Policy wording in accordance with 9.2.18 of Planning Policy Wales Edition 9. Including reference to negotiation on a site by site basis seems to undermine the ability of the planning authority to use the overall target for each submarket area as a starting point for negotiations. Policy 53 provides further advice on viability and flexibility. An Inspector’s view is welcomed. Reference will be made in the Focussed Change to the reasoned justification of Policy 49 Affordable Housing.</p> <p><b>Please note - Affordable Housing Viability Study:</b> The final version of the study was published in May 2017. It unfortunately has a typographical error referring to December 2016 in the footer – apologies.</p> <p>The figures in Table 5.2 of the May 2017 Study are reflected in Table 7.1 of the same study and can be found in Table 9 of the Local Development Plan starting on page 122.</p> <p>The driver for adjusting the figure was to ensure that planning obligations reflected an average across all development types rather than the full cost of a 30 per hectare unit development – see Appendix 4 to the Housing Background Paper for further explanation – see in particular section on Planning Obligations which provides further advice.</p>
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<b>Saundersfoot housing provision (Landscape and Natural Environment Impacts)</b>					
LDP Section references	Saundersfoot Candidate Sites:  Land at Sandy Hill 051 North of Whitlow 031/031A Penny Farm 036/037/038  Saundersfoot Housing Allocations:HA4, HA5, HA6				
Representors <b>(Bold type</b> identifies which representors have requested to be heard.)	3576/142	3391/188	4616/205	4632/218	4651/233
	3607/143	3564/189	4617/206	4634/220	4657/234
	4601/144	3567/190	4618/207	4635/221	4659/235
	4604/146	3569/191	4620/209	4636/222	4660/236
	4610/147	3572/192	4621/210	4639/224	
	4615/149	<b>3582/195</b>	4626/213	4640/225	
	4637/150	4451/196	4627/214	4642/226	
	4643/151	4605/198	4628/215	4644/227	
	4654/152	4612/203		4647/229	
	4655/153	4613/204	4630/216	4648/230	
Relevant content of the LDP to which the main issue relates	The Candidate Sites Assessments and the proposed allocation of sites at Saundersfoot under Policy 48 Housing Allocations.				
LPA's summary of the deposit representation(s)	Do not wish to lose any green spaces around the village. The number of houses proposed will have an impact on the character of Saundersfoot. Building at the edge of the village is not appropriate. Development constitutes erosion of the National Park. Potential for damage to woodland. Concerns about biodiversity.				
Changes sought by those submitting representations	Deletion of the allocations. Some representors seek provision to be made in Tenby.				
<b>LPA's recommendations, including reasons</b>	<ol style="list-style-type: none"> <li>1. All three of the allocated sites are privately-owned and are not publicly accessible land. Whilst priority is given to the redevelopment of brownfield sites wherever possible, it has not been possible to provide adequate land to accommodate the level of development identified without using greenfield sites, such as these sites in Saundersfoot. A full assessment of each of the sites has been undertaken as part of the Candidate Site process. There will also be requirements for open space provision as part of any proposals considered.</li> <li>2. All three sites have been fully assessed to ensure impact</li> </ol>				

	<p>on the locality and wider landscape is acceptable. Consultations with relevant bodies have been undertaken to ensure that there is sufficient capacity to cater for the proposed developments.</p> <ol style="list-style-type: none"> <li>3. There is insufficient land available within the centre of Saundersfoot for development. The sites are all within walking distance of the centre of Saundersfoot and the range of facilities and services available there.</li> <li>4. Whilst conservation and enhancement of the National Park is a primary legislative requirement, National Parks are living and working environments and there is a need to cater for development. A full assessment of each of the sites has been undertaken as part of the Candidate Site process and the impact on the National Park has been a central consideration in this process.</li> <li>5. The site north of Whitlow is situated adjacent to a plantation woodland, which itself is on the site of Ancient Woodland. Some of the woodland has recently been felled. It has been advised by the Authority's Woodland Officer, Ecologist and Pembrokeshire County Council's Planning Ecologist that a buffer between the woodland and the housing can be created through an appropriate site layout and the creation of a footpath around the perimeter of the wider site. This could link the existing public right of way to the western side of the site with the footway along the eastern side of the site, required by the Highway Authority. A focussed change is proposed to add these requirements for the Whitlow site to Table 7 of the Deposit Plan. The Authority can consider if further action is required to protect any trees within or adjacent to the site and if necessary apply Tree Preservation Orders. Further information was sought from one representor who advised that Section 7 species had been found within the site. The information provided was insufficiently robust to preclude the allocation of the site for development.</li> </ol> <p>Conclusion: A focussed Change is proposed as set out above.</p>
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<b>Saundersfoot housing provision (Specific constraints to development)</b>				
LDP Section references	Saundersfoot Candidate Sites:  Land at Sandy Hill 051 North of Whitlow 031/031A Penny Farm 036/037/038  Saundersfoot Housing Allocations:HA4, HA5, HA6			
Representors ( <b>Bold type</b> identifies which representors have requested to be heard.)	<b>2906/140</b>	3391/188	4607/200	4628/215
	3576/142	3564/189	4611/202	4631/217
	3607/143	3567/190	4613/204	4635/221
	4603/145	3569/191	4616/205	4636/222
	4604/146	3572/192	4617/206	4638/223
	4610/147	3573/193	4618/207	4639/224
	4614/148	3575/194	4619/208	4640/225
	4615/149	<b>3582/195</b>	4620/209	4644/227
	4637/150	4451/196	4623/211	4648/230
	4643/151	4599/197	4625/212	4649/231
	4654/152	4605/198	4626/213	4657/234
	4655/153	4606/199	4627/214	4660/236
Relevant content of the LDP to which the main issue relates	The Candidate Sites Assessments and the proposed allocation of sites at Saundersfoot under Policy 48 Housing Allocations.			
LPA's summary of the deposit representation(s)	Roads within Saundersfoot are not suitable for additional traffic. Roads into Saundersfoot are not suitable for additional traffic. Traffic congestion around the school is a major concern. Traffic congestion around the school will impact on access for emergency vehicles. Parking in Saundersfoot is limited – particularly during the summer. There is no safe access to the train station. Is the electricity supply adequate to cater for the proposed development? Is the water supply adequate to cater for the proposed development? Is there sufficient sewage/drainage capacity to cater for the proposed development?			
Changes sought by those submitting representations	Deletion of the allocations. Some representors seek provision to be made in Tenby.			
<b>LPA's recommendations,</b>	1. The Highway Authority has assessed each of the sites in terms of access and capability of the local road network			

<p><b>including reasons</b></p>	<p>to cope with any additional traffic generated. As a result of the comments received on the Deposit Plan further clarification has been sought from the Highway Authority. It has been advised that all of the sites are within walking distance of the Centre of Saundersfoot (the Chatered Institution of Highways and Transportation (2015) states that across Britain about 80% of journeys under 1 mile are made on foot). Most of the services and facilities are located in the central area. There are also options to cycle or use the public buses. The provision of additional footways within the Whitlow site will also help pedestrian movement. Calculations were undertaken using a nationally recognised standard for car trip generation from new developments and it was concluded that the developments would not result in a detrimental impact on the highway network, subject to satisfactory connection to the footway network and the local bus service.</p> <ol style="list-style-type: none"> <li>2. With regard to congestion at the school this is not an issue that is particular to Saundersfoot. Over half of the pupils currently attending Saundersfoot school are from outside the usual catchment area. All three of the sites allocated for residential development in Saundersfoot are within the catchment area for the school and also within walking distance which would, over time, reduce the need for parents to deliver their children to the school gate by car. Whilst providing housing within walking distance of the school has the potential to reduce the issue over time, it is a matter for the school, parents, police and the highway authority to deal with any safety issues currently arising. The Highway Authority has considered the site allocations and raised no objection.</li> <li>3. With regard to parking concerns all three sites are within walking distance of the village centre. Whilst means of travel remains a personal choice, development of the 3 allocated sites will allow residents to walk, cycle and take public transport to the village centre which may be preferable if parking is limited.</li> <li>4. Saundersfoot railway station is remotely located from the village and the current access includes significant lengths of roads with no footways. The Highway Authority has requested that planning obligations contributions arising from the grant of planning permission for the proposed residential land allocations in Saundersfoot are used to</li> </ol>
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	<p>help improve pedestrian access to the station, although it is unlikely that the situation will be wholly resolved. The lack of pedestrian access to the train station however, is not a constraint to the delivery of the sites.</p> <p>5. The Authority commissioned a Land Implementation Study which considered the viability of delivering development at sites allocated in the Deposit Plan. Western Power and Dwr Cymru/Welsh Water were consulted as part of the process and raised no objections to development of any of the 3 sites allocated in Saundersfoot.</p> <p><b>Conclusion:</b> Disagree</p>
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<b>Saundersfoot housing provision (Constraints to development within the site)</b>	
LDP Section references	<p>Saundersfoot Candidate Sites:</p> <p>Land at Sandy Hill 051 North of Whitlow 031/031A Penny Farm 036/037/038</p> <p>Saundersfoot Housing Allocations:HA4, HA5, HA6</p>
Representors <b>(Bold type</b> identifies which representors have requested to be heard.)	<p>3576/142 3607/143 4614/148 3391/188 4616/205 4620/209</p>
Relevant content of the LDP to which the main issue relates	The Candidate Sites Assessments and the proposed allocation of sites at Saundersfoot under Policy 48 Housing Allocations.
LPA's summary of the deposit representation(s)	<p>The entrance into the Whitlow site is unsuitable There may be a munitions dump and mining shaft within the site. A footpath running from the Ridgeway to the Church will be affected. There is an underground stream at Whitlow. The Whitlow site is used for walking by local residents.</p>
Changes sought by those submitting representations	Deletion of the allocations. Some representors seek provision to be made in Tenby.
<b>LPA's recommendations, including reasons</b>	<ol style="list-style-type: none"> <li>1. The Highway Authority has been asked to provide further comment on the access to the site as a result of the comments received through the Deposit Plan consultation. It has been advised that the multi modal opportunities for access to this site (walking, cycling and public transport as well as car) are high, subject to the provision of a footway up to and into the site from the existing footway network north of Whitlow. It is estimated that a single access into the site could accommodate up to 150 new dwellings which would need to be confirmed by a Transport Assessment.</li> <li>2. The Coal Authority has been consulted and advise (September 2018) that the site falls within the defined Development High Risk Area. Their records indicate that there are coal outcrops running through the site which may have been subject to historic unrecorded coal workings at shallow depth. The potential presence of</li> </ol>

	<p>such workings does not preclude development of the site but proposals to develop the site will need to take account of the potential risks posed by past coal mining activity and measures taken to identify and implement and remedial measure necessary to ensure the safety and stability of the development.</p> <ol style="list-style-type: none"> <li>3. The Contaminated Land Register does not show any areas within nor close to the site. Should munitions be found within the site then the necessary measures will be required prior to development of the site.</li> <li>4. There is a footpath running along and close to the western-most edge of the larger site area of Whitlow. This is not a constraint to development. If at all possible the route of the footpath will be protected in situ. If this is not achievable then the route could be altered by means of a footpath diversion order. However, the footpath is close to the boundary of the site and it is likely that this area could be retained as open space within the site.</li> <li>5. This is not an absolute constraint to development.</li> <li>6. Pembrokeshire County Council drainage engineers have no records of underground streams in this location. The OS maps show water courses within the site. Detailed survey work will be required to ascertain whether there are any unknown features which may influence the layout of the site. It should not preclude development of the site, however.</li> <li>7. The land is privately owned and not publicly-accessible. There is a footpath running through the western edge of the site which will be retained where possible or diverted if necessary and access along the footpath will be retained.</li> </ol> <p><b>Conclusion:</b> Disagree</p>
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<b>Saundersfoot housing provision (Housing Issues)</b>				
LDP Section references	Saundersfoot Candidate Sites:  Land at Sandy Hill 051 North of Whitlow 031/031A Penny Farm 036/037/038  Saundersfoot Housing Allocations:HA4, HA5, HA6			
Representors <b>(Bold type</b> identifies which representors have requested to be heard.)	<b>2906/140</b>	3391/188	4612/203	4642/226
	3576/142	3567/190	4613/204	4650/232
	3607/143	3569/191	4618/207	4660/236
	4603/145	3573/193	4620/209	4661/237
	4610/147	<b>3582/195</b>	4625/212	
	4614/148	4451/196	4628/215	
	4615/149	4599/197	4630/216	
	4654/152	4606/199	4631/217	
	4655/153	4607/200	4633/219	
Relevant content of the LDP to which the main issue relates	The Candidate Sites Assessments and the proposed allocation of sites at Saundersfoot under Policy 48 Housing Allocations.			
LPA's summary of the deposit representation(s)	<p>New-build housing is too expensive for local residents. Development will encourage more second homes which will harm the community.</p> <p>Existing open market housing should be purchased for affordable housing.</p> <p>Only small numbers of affordable housing will get built on the sites.</p> <p>The developments will reduce the value/appeal of existing housing.</p> <p>Additional market housing is not needed in Saundersfoot. Would the affordable housing really be affordable housing? More innovative/alternative ways to provide affordable housing are needed.</p> <p>Promised affordable housing on sites in the village has failed to materialise.</p> <p>Development should be directed to other locations in Pembrokeshire where land prices are cheaper.</p> <p>There are other more suitable sites in Pembrokeshire.</p>			
Changes sought by those submitting representations	Deletion of the allocations. Some representors seek provision to be made in Tenby.			
<b>LPA's recommendations,</b>	1. The allocation of all three sites includes a requirement of affordable housing provision. The provision of open market housing is required to help cross-subsidise the			

<p><b>including reasons</b></p>	<p>affordable housing provision and the market will determine the price of the open market housing.</p> <ol style="list-style-type: none"> <li>2. The allocation of all three sites includes a requirement of affordable housing provision. Legal agreements are used to ensure that the affordable housing units remain so in perpetuity and thus they will not become second homes. The Authority cannot place the same level of control over market housing as there is no distinction in the Use Class Order between a permanent dwelling and a second home. The market housing is needed, however to help cross-subsidise the affordable housing as there is insufficient public money available to develop the amount of affordable housing required to meet identified needs.</li> <li>3. Financial contributions are sought when planning permission is granted for single market dwellings which are used to help provide affordable housing. Some market housing has been purchased on behalf of the housing associations where on-site contributions have not been feasible but generally the preferred approach is to include affordable housing provision within the site to help sustain communities. However the demand for affordable housing considerably exceeds the number of units that could be delivered through purchase of market housing as the price of such housing is high – hence the need for the provision of bespoke affordable housing.</li> <li>4. The National Park Authority seeks to maximise the number of affordable housing units built on allocated sites. A study into the viability of site delivery has been undertaken and the level of affordable housing expected to be provided on each of the allocated sites will be agreed as part of the Examination and as part of any subsequent planning permission granted. The additional scrutiny undertaken as part of the current assessment of sites will assist in delivering the expected numbers of affordable properties, combined robust legal agreements to ensure their delivery on-site. The Authority would not wish to allocate sites that cannot deliver affordable housing on site.</li> <li>5. The planning system must provide for an adequate and continuous supply of land, available and suitable for development to meet society’s needs. Factors to be taken into account in making planning decisions must be</li> </ol>
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	<p>planning matters; that is they must be relevant to the regulation of the development and use of land in the public interest, towards the goal of sustainability. The planning system does not exist to protect the private interests of one person against the activities of another. Proposals should be considered in terms of their effect on the amenity and existing use of land and buildings in the public interest. The site assessments include consideration of the potential impacts on the locality and have been found to be acceptable. The privacy and amenity of existing properties neighbouring the sites will be considered at the planning application stage when details of site layout, orientation of dwellings and design are provided.</p> <ol style="list-style-type: none"> <li>6. Due to a shortage of public funds, the planning system is used to allow some of the profits arising from market housing to help cross-subsidise affordable housing provision. This is a national planning requirement.</li> <li>7. Affordable housing is defined for the purposes of the land use planning system as housing that is available exclusively to people in housing need that cannot afford to access the open market. Affordable housing is available for sale or rent at below market values and is required to remain as affordable for the initial and future occupiers of the properties. All affordable housing provided within the sites would be controlled by means of legal agreement and/or placed in the control of a Registered Social Landlord or the Housing Authority to ensure that it is affordable housing and remains so in perpetuity.</li> <li>8. The Authority is happy to consider proposals presented to provide affordable housing by a variety of means, but at present they are not sufficient to meet the high level of need for affordable homes. Due to a shortage of public funds, the planning system is used to allow some of the profits arising from market housing to help cross-subsidise affordable housing provision. This is a national planning requirement.</li> <li>9. There are two instances in Saundersfoot where affordable housing, required as part of a wider site development, has not come forward to date. The first of these relates to a conversion of a former hotel to</li> </ol>
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	<p>residential use. The building was sold prior to the completion of the work and without the trigger for the provision of affordable housing being met. A further application to use the building as part of an existing hotel in the village was granted permission as it provided economic benefit to the area. A second site relates to the conversion of the former Cambrian Hotel and new build dwellings to the rear. The developer has currently built up to the maximum number of new homes within the site without triggering the need for completion of any affordable units. The practice of allowing some development to come forward to help with developer finances is normal practice. When interest is shown in completing the site, the requirements of the Section 106 Agreement will stand and the affordable housing units will be required. The Authority has had a similar experience with a site elsewhere recently where there was a delay between phases of a site's development. In that particular instance there was an informal request to vary the condition to reduce the level of provision of affordable housing. The evidence was insufficient to sway to Authority's requirements. Any request to vary the Section 106 Agreement at Saundersfoot would require further financial details to be provided for full viability testing to be undertaken and an agreed marketing exercise to be carried out to establish any interest in the site from other parties.</p> <p>10. Financial contributions from single open-market dwellings in the Saundersfoot area have raised £185,132 to date with £100,000 transferred to Pembrokeshire Housing Association (now Ateb) for purchase of an existing house in Saundersfoot to be used as an affordable dwelling. In addition to this a further £100,000+ is required to be paid prior to the occupation of single market dwellings which have received planning permission but which are yet to be built.</p> <p>11. Land allocations have been proposed in several settlements within the National Park. Pembrokeshire County Council is the planning authority for the area outside the Park. The strategy for locating growth in the National Park follows that of the Wales Spatial Plan, chosen as it delivered most in terms of the Sustainability Appraisal objectives and the soundness tests which have to be considered when preparing Local Development</p>
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	<p>Plans. The overall aim of the framework for the Pembrokeshire Haven is to achieve greater prosperity, attract inward investment, direct development to the main towns on the economic corridor, help to sustain rural communities, achieve sustainability principles and protect the National Park. In addition to the 3 strategy hubs based around the main towns in Pembrokeshire, outside the National Park, the towns and villages have lower order roles. Growth is distributed through the National Park Centres primarily, where suitable and deliverable sites have been submitted for consideration. Whilst the larger towns outside the National Park will have the greatest amount of growth, the level of provision of new development in the smaller Centres is commensurate with their size and ability to absorb the growth, without harming the special qualities of the National Park.</p> <p>12. Sites within the National Park submitted for consideration as a Candidate Site have been assessed within that strategic context, and allocated where they are considered to be appropriate for development.</p> <p><b>Conclusion:</b> Disagree.</p>
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Saundersfoot housing provision (Impact on facilities and services)				
LDP Section references	Saundersfoot Candidate Sites:  Land at Sandy Hill 051 North of Whitlow 031/031A Penny Farm 036/037/038  Saundersfoot Housing Allocations:HA4, HA5, HA6			
Representors <b>(Bold type identifies which representors have requested to be heard.)</b>	<b>2906/140</b>	3391/188	4612/203	4634/220
	3576/142	3567/190	4613/204	4639/224
	3607/143	3569/191	4616/205	4640/225
	4601/144	3572/192	4617/206	4642/226
	4603/145	3573/193	4618/207	4644/227
	4604/146	3575/194	4619/208	4645/228
	4610/147	<b>3582/195</b>	4621/210	4649/231
	4614/148	4451/196	4623/211	4651/233
	4615/149	4599/197	4625/212	4659/235
	4637/150	4605/198	4626/213	4660/236
	4643/151	4606/199	4627/214	
	4654/152	4607/200	4628/215	
	4655/153	4611/202	4631/217	
Relevant content of the LDP to which the main issue relates	The Candidate Sites Assessments and the proposed allocation of sites at Saundersfoot under Policy 48 Housing Allocations.			
LPA's summary of the deposit representation(s)	The school does not have capacity to take additional children from these developments. The surgery does not have capacity for additional patients. The surgery has insufficient parking. Tenby patients will be registering at the Saundersfoot Surgery when their facility closes. There is a lack of employment opportunities for new residents. Local shops are already insufficient to cater for the local populations. There are no dental facilities in the village.			
Changes sought by those submitting representations	Deletion of the allocations. Some representors seek provision to be made in Tenby.			
<b>LPA's recommendations, including reasons</b>	1. Pembrokeshire County Council Education department has advised that <b>Saundersfoot School</b> is currently at capacity and is forecast to be within 10% of capacity during the next 5 years. On the basis of the pupil census for 2017 there is significant cross catchment preference in the area with 56% of the pupils attending the school			

	<p>coming from neighbouring catchments. Of the neighbouring schools there is capacity at Sageston, Stepaside CP, Tenby VC and Ysgol Hafan y Mor (in Tenby). Admissions legislation is such that parents can apply for places in any school they wish and the Education Authority has to accede to that preference if a school's admission number is not reached. However, where there is oversubscription a criterion is applied which generally favours applications from catchment pupils, provided that applications for places are made by the published deadline dates.</p> <ol style="list-style-type: none"> <li data-bbox="651 629 1490 1541">2. The fact that over half the pupils of Saundersfoot School reside outside the catchment for the school is likely to be a contributory factor in the congestion problems cited by many of the people making representations to the land allocations. The sites allocated within the village are all within walking distance of the school. Some of the housing to be built within these sites, and particularly the affordable housing, is likely to house families already living in the area and some of the children may already be pupils at Saundersfoot School. The figures also need to be considered in the context of the population figures for the National Park which show that it has an older population age profile than the wider Pembrokeshire Unitary Authority area as a whole and Wales. The median age of the National Park population is 53 compared to 47 for Pembrokeshire and 42 in Wales. The National Park's population has aged since 2001 with the proportion of the population aged 65+ increasing from 22% to 30%. This compares with 19% to 25% for Pembrokeshire as a whole and 17% to 20% in Wales. Natural change in the population has remained negative (i.e. greater number of deaths than births reflecting the aging population) since 2001 and this coupled with a reduction of in-migration has resulted in modest decline in population in the latter years of this period.</li> <li data-bbox="651 1579 1490 1868">3. Whilst the school is currently at capacity the Education Authority advises a 10% reduction in numbers in the short-term. Beyond that the National Park has an aging population and therefore numbers of school children are likely to decrease further. In addition, the policies of the Education Authority are to give priority to pupils residing in the catchment, whereas over half the pupils currently attending the school reside outside the catchment. There</li> </ol>
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is also likely to be a proportion of children who will live within the allocated sites already attending the school. Thus the school is likely to be able to meet the demand arising from within Saundersfoot in the future.

4. Whilst capacity for the **local surgery** to take additional patients is not a constraint to development of the site, the surgery nonetheless is one of the facilities that makes Saundersfoot a suitable location to accommodate additional development. Following the level of concern raised about this issue through the Deposit consultation, the Surgery Manager was contacted to establish if there is available capacity. The response was received in August 2018 advising that there is no current issue with capacity at the surgery and they are confident that with the current level of health practitioners at the practice they have sufficient capacity to cater for new patients living within the proposed site allocations. The available capacity combined with a higher than average death rate (due to Pembrokeshire having an aging population) and a proportion of the occupants of the proposed new dwellings already being resident in Saundersfoot and patients of the surgery provides a good degree of certainty that the surgery can cater for any newly arising need from within the community.
5. All three sites are within walking distance of the surgery. Whilst means of travel remains a personal choice, development of the 3 allocated sites will allow residents to walk, cycle and take public transport to the village centre which may be preferable if parking is limited.
6. Parking at the surgery is a matter for the surgery and the health board and is not a constraint to development of the sites at Saundersfoot.
7. The Saundersfoot Surgery Manager has advised (August 2018) that an offer was made recently to take 2000 patients from the Tenby surgery as a respite offer whilst they were dealing with challenges within their practice. This offer was not taken up, however and is no longer an issue.
8. Those occupying old or new properties developed in Saundersfoot can take advantage of existing or future employment opportunities in the locality. The Local

	<p>Development Plan doesn't specifically specify sites for employment development but includes criteria based policies for future development.</p> <p>9. There is a section on 'Workplace Zones in the Authority's Background Paper on employment which shows the work place zones in Pembrokeshire with a colour gradation indicating the proportion of the persons working in each zone (aged 16+) that also live within that zone. There tends to be an assumption that there are no employment opportunities in the National Park which is not borne out by the evidence.</p> <p>10. Whilst there may be limitations on the availability of certain services and facilities in Saundersfoot, the number and range of shops available in the village is relatively high when compared with other village of this size. There are grocery stores, a range of shops selling comparison goods and a relatively large number of cafes and restaurants.</p> <p>11. Saundersfoot is not unique in the respect and whilst it has a wider range of facilities than many Centres in the National Park, residents will need to travel further afield for some.</p> <p><b>Conclusion:</b> No change</p>
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<b>Saundersfoot housing provision (Other Issues)</b>																																																	
LDP Section references	<p>Saundersfoot Candidate Sites:</p> <p>Land at Sandy Hill 051 North of Whitlow 031/031A Penny Farm 036/037/038</p> <p>Saundersfoot Housing Allocations:HA4, HA5, HA6</p>																																																
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Relevant content of the LDP to which the main issue relates	The Candidate Sites Assessments and the proposed allocation of sites at Saundersfoot under Policy 48 Housing Allocations.																																																
LPA's summary of the deposit representation(s)	<p>More thought is needed for provision of recreational space. Loss of the footpath will impact on health and well-being. An increase in school traffic will impact on children's health and safety and increase pollution. The development will impact on visitors coming to Saundersfoot. Building work will cause disruption and noise. Development will result in loss of land for the local tenant farmer. Development will increase carbon emissions. There is a flood risk in the centre of the village. Development should be directed to the Bryn Hir site in Tenby. What has changed since the previous assessment of the Whitlow site in 2009 which now makes it acceptable for development?</p>																																																
Changes sought by those submitting representations	Deletion of the allocations. Some representors seek provision to be made in Tenby.																																																
<b>LPA's recommendations, including reasons</b>	<ol style="list-style-type: none"> <li>1. All three of the sites allocated are in private ownership and other than any public rights of way crossing through them are not accessible to the public. The Open Space Assessment Background Paper shows that there is an outstanding need for additional formal recreation space in</li> </ol>																																																

	<p>Saundersfoot in the form of sports pitches, areas for outdoor sport and equipped play. Planning applications for 10 or more houses will be assessed against the Planning Obligations requirements. These are currently set out in Supplementary Planning Guidance to the current Local Development Plan. This will be reviewed and updated to support the Replacement Plan, once adopted. Details of the open space requirements within the allocated sites are set out in the Land Implementation Study.</p> <ol style="list-style-type: none"> <li>2. Informal recreation areas within and surrounding the village are supplemented by the large beaches at Saundersfoot and Coppet Hall.</li> <li>3. There is a footpath running along and close to the western-most edge of the larger site area of Whitlow. Not all of the Candidate Site area has been allocated in the Plan. Even so, this would not be an absolute constraint to development. If at all possible the route of the footpath would be protected in situ. If this is not achievable then the route could be altered by means of a footpath diversion order.</li> <li>4. Over half of the pupils currently attending Saundersfoot school are from outside the usual catchment area. All three of the sites allocated for residential development in Saundersfoot are within the catchment area for the school and also within walking distance which would reduce the need for parents to deliver their children to the school gate by car. Whilst providing housing within walking distance of the school has the potential to reduce the issue over time, it is a matter for the school, parents, police and the highway authority to deal with any safety issues currently arising.</li> <li>5. There is a possibility that building work may cause some temporary disruption, but planning conditions are regularly used to help minimise impact. The sites have been assessed for their impact on the local area and the special qualities of the National Park and are considered to be accessible for development. Whilst changes brought by the land being developed will obviously be visible within and close to the sites, they are all visually contained by existing features and topography. It would be unreasonable to prevent all development in the</li> </ol>
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	<p>National Park.</p> <ol style="list-style-type: none"> <li>6. To some extent this is inevitable, particularly for those living closer to the site. However planning conditions are regularly used to minimise disruption during the construction phase and it is not a constraint on development.</li> <li>7. The land is privately owned and any tenancies are a private matter for the landowner and the tenant. Landowners of each of the sites have advised that they wish to develop the land.</li> <li>8. Regarding carbon emissions this is inevitable and not particular to these sites. The sites allocated have been considered against the Sustainability Appraisal of the Plan and due to their location close to the facilities and services available in Saundersfoot as well as the bus and rail routes to other towns in Pembrokeshire and beyond, offer potential for more trips to be made via walking, cycling and public transport which is a key objective of the Welsh Government and set out in Planning Policy Wales.</li> <li>9. None of the allocated sites are within flood risk zones.</li> <li>10. A key requirement for site allocations is deliverability of development. The site at Bryn Hir in Tenby has been allocated in various development plans produced by the Authority since the mid-1980s but has failed to be developed. Since the publication of the Deposit Plan the land owner (Pembrokeshire County Council) has advised that they are now exploring ways to bring the site forward for development, but delivery of that site remains uncertain at the current time. The Authority would wish to see sites developed at these two locations, it is not an either or scenario.</li> <li>11. The site was considered for allocation in the current adopted Local Development Plan. At that time other land in the centre of the village along with extant planning permissions and land at Tenby and New Hedges was also considered and found to be appropriate for development to meet the level of housing need required for the Plan period. Not all of the sites allocated in the current allocated Plan have come forward and the Authority has not been able to maintain a 5-year supply of</li> </ol>
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	<p>land for housing development. Delivery of sites allocated in the Plan is now a key consideration of the process. The land at Whitlow was once again submitted as a Candidate Site and considered against the current methodology and in the current circumstances. It was found to be appropriate for development, following assessment of the site and consultation with the relevant infrastructure providers.</p> <p><b>Conclusion:</b> Disagree</p>
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<b>Saundersfoot North of Whitlow (Deliverability)</b>	
LDP Section references	Saundersfoot Candidate Sites: North of Whitlow 031/031A Saundersfoot Housing Allocation: HA5
Representors <b>(Bold type identifies which representors have requested to be heard.)</b>	<b>3319/187</b>
Relevant content of the LDP to which the main issue relates	The Candidate Sites Assessments and the proposed allocation of sites at Saundersfoot under Policy 48 Housing Allocations.
LPA's summary of the deposit representation(s)	The landowner advises of the need to include the whole candidate site for North of Whitlow as developing part of the site would be unviable.
Changes sought by those submitting representations	Include the whole candidate site for North of Whitlow as developing part of the site would be unviable.
<b>LPA's recommendations, including reasons</b>	<p>This representation raises issues relating to viability of delivering the smaller site area and the number of affordable houses proposed for the site.</p> <p>A further meeting with the landowner has taken place. He advised that further work has been undertaken in conjunction with a developer to consider the level of development required to make delivery of this site viable. Officers have been advised that the current allocation in the Deposit could be made to work but that a better development could be achieved if a larger area was included. The representor advised that he intends to appear at Examination.</p> <p>Further discussion at Examination would be welcomed. The landowner originally indicated an intention to not to appear but is now likely to do so.</p> <p>Please also see the Authority's response regarding the identification of land for long term development on the Proposals Map (Representor WG).</p> <p><b>Conclusion:</b> The Authority would welcome further discussion at Examination on this matter.</p>

<b>Policy 51 Gypsy Traveller and Showpeople Sites</b>	
LDP Section references	Criterion a) Policy 51 Gypsy Traveller and Showpeople sites
Representors	1569/172
Relevant content of the LDP to which the main issue relates	The appropriateness of including criterion a)
LPA's summary of the deposit representation(s)	Criterion a) is contrary to national policy. It implies Gypsies and Travellers have restricted freedom of movement to develop sites in other local authorities. This could be deemed as indirect discrimination under the Equality Act 2010 as Gypsies and Travellers are nomadic in nature and less likely to have a local connection to any particular local authority.
Changes sought by those submitting representations	Deletion of the criterion.
<b>LPA's recommendations, including reasons</b>	<p>The purpose of the criterion in the Local Development Plan 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>Our current criterion which is causing difficulties advises:</p> <p>'a) evidence of need to locate or provide transitory arrangements in the area has been identified; and'</p> <p>Appeal decisions looked at refer to (in terms of establishing need):</p> <ul style="list-style-type: none"> <li>- Establishing a general need in the most recent Gypsy Traveller Accommodation Assessment to justify a site that can't be provided for by the LDP provision – for us this would be within a Pembrokeshire context. The criterion used in Policy 51 is flexible enough to consider other needs identified as well.</li> <li>- Establishing an individual need – only applying to those who meet the planning definition of a Gypsy. What alternative accommodation might be available in a reasonable time frame (enforcement appeal)? Are the applicants listed on the Gypsy Traveller Waiting list?</li> </ul>

	<p>-Considering personal circumstances.</p> <p>-Considering granting temporary permission where alternative provision is likely in the future</p> <p>That approach reflects paragraph 36 onwards of Circular 30/2007(now superseded) and paragraph 58 onwards of the new Circular 005/2018. Section 38 of the Planning and Compulsory Purchase Act 2004 provide that determinations of applications for planning permission shall be made in accordance with the development plan unless material considerations indicate otherwise. Other considerations for Gypsy and Traveller site applications will usually include the impact on the surrounding area, the existing level of provision and need for sites which are evidenced as part of the Gypsy and Traveller Accommodation Assessment for the area.</p> <p>One option to address the objection is to suggest, that to ensure explicit consistency with the advice in 005/2018 Appendix B, that the Authority prefixes the criterion with 'where the proposal is in a location where housing development would not normally be permitted' This would address the specific issue highlighted by Welsh Government regarding placing restrictions on proposals that would not be placed on non-Gypsies and Travellers in Appendix B page 29 last reference to examples unacceptable criteria. It wouldn't however reconcile the obligations upon the planning authority and any Inspector to consider the matters set out in paragraph 58 onwards in the Circular.</p> <p>Note Paragraph 61 of the Circular also refers to needing to explore if there are alternative sites available before allowing proposals outside settlement boundaries.</p> <p>Policy 7 Countryside (TIER 5) (Strategy Policy) advises in criterion</p> <p>'m) There is a need for a Gypsy and Traveller site in a countryside location (see Policy 51). ' which would be consistent with the suggested amendment above.</p> <p>Another option would be to delete the criterion and instead to cross refer in the reasoned justification to the need to comply in particular with requirements for submitting a planning application as set out in Circular 005/2018 which would cover requirements set out in paragraphs 58 to 69 of the Circular. Other cross referencing to national planning policy and guidance can be</p>
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	<p>found in the Plan.</p> <p>A discussion at Examination to clarify what the expectations are from the Circular/WG would be helpful.</p> <p>Also to note in Criterion d) there is a typographical error 'and on site services and facilities' needs addressing. A <b>focussed change</b> is proposed.</p> <p>The site sustainability criteria in paragraph 37 of the new Circular against the Deposit Plan policy text and the wording is considered to be adequate.</p> <p>Proposals considered by the Authority tend to be one off proposals in countryside locations. The reference to ensuring that proposals are in proportion to settled communities (Good Practice Criteria- Annex B, paragraph 5) is unlikely to arise.</p> <p><b>Conclusion:</b> The Authority would welcome a discussion on these matters at Examination.</p>
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## Focussed Changes

33. A total of 26 representations were received from 15 representors. Main issues raised are responded to below.

<b>FC16 - HA3 Land North of the Business Park, Newport</b>	
LDP Section references	Policy 48 Housing Allocations
Representors	4465/10
Relevant content of the LDP to which the main issue relates	Site Reference - HA3 Land North of the Business Park, Newport Candidate Site Reference 88A
LPA's summary of the deposit representation(s)	Propose changes to phasing and potential extension of the housing site at Newport – North of Business Park.
Changes sought by those submitting representations	See above.
<b>LPA's recommendations, including reasons</b>	The Authority's view on including a larger area for development remains unchanged from the Candidate Site assessment published alongside the Deposit Plan. No objection to the

	<p>Deposit Plan was received regarding this.</p> <p>In terms of identifying the timescales for the allocated site's likely development the Authority has relied primarily upon:</p> <ul style="list-style-type: none"> <li>- The Land Implementation Study prepared for the Authority on the sites.</li> <li>- The rates of development historically experienced in the various Centres around the Plan area.</li> <li>- The usual lead in times for progressing allocations to planning application stage and then forward to development.</li> </ul> <p>As the agent is proposing to appear further evidence on this matter can be discussed.</p>
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<b>FC16 - HA11 West of The Green Lydstep</b>	
LDP Section references	Policy 48 Housing Allocations
Representors	4464/11
Relevant content of the LDP to which the main issue relates	Site Reference – HA11 West of the Green Lydstep
LPA's summary of the deposit representation(s)	<p>Phasing and potential extension of the housing site at Lydstep. Concern with the reduction from the proposed 24 to 10 units and the suggested timetable for delivering the envisaged properties on the grounds of:-</p> <ul style="list-style-type: none"> <li>a) Failing to deliver much needed market housing and affordable housing in the Lydstep / Tenby area, and</li> <li>b) Creating a situation whereby the viability of delivering only 10 units, and then not until 2026, is jeopardised through having to incorporate a disproportionate amount of the abnormal/unforeseen costs anticipated for this site into a lesser amount of units.</li> </ul>
Changes sought by those submitting representations	See above.
<b>LPA's recommendations, including reasons</b>	<p>No objection was received regarding this proposed site when the Plan was placed on Deposit.</p> <p>The Authority's assessment of the candidate site at Deposit stage remains unchanged.</p>

	<p>The issues raised regarding viability are queried.</p> <p>The viability assessment carried out by the Authority (Arcadis Study) includes an allowance for infrastructure in build costs).</p> <p>In terms of foul drainage upgrade works £300,000 – Welsh Water has advised there is adequate capacity available at the STW.</p> <ul style="list-style-type: none"> <li>• Foul drainage off-site connection £100,000 – the Authority has consulted Welsh Water on this and will be in a position to provide further advice at Examination.</li> <li>• Pedestrian link £50,000 - Advice from the Highways Authority is that a footway link at the entrance to the site and a pedestrian link to the Green would likely to be in the region of £5,000 which would already be contained within normal site development costs.</li> <li>• Ecology work £50,000 – this will be included in professional fees.</li> <li>• Off-site surface water works £100,000 Sustainable drainage proposals will need to be on site.</li> </ul>
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<b>FC16 &amp; FC23 – HA9 Broad Haven Land North East &amp; South East of Marine Rd &amp; Table 9 Percentage of Affordable Housing for Housing Submarket Areas</b>	
LDP Section references	Policy 48 Housing Allocations & Table 9 Percentage of Affordable Housing for Housing Submarket Areas
Representors	3372/16
Relevant content of the LDP to which the main issue relates	Site Reference – HA9 Land North East & South East of Marine Rd
LPA’s summary of the deposit representation(s)	Policy 48 so far as it relates to site HA9 Broad Haven Land North East & South East of Marine Road would render PCNPA Local Plan 2 Unsound in that the Plan is not appropriate in the light of the evidence and the Plan will not be effective since it will not be deliverable. The increase in the level of affordable housing from 10% to 34% in Focussed Change 16 so far as it relates to site HA9 renders the site nonviable and therefore undeliverable. Footnote *2 to Focussed Change 16 in relation to site HA9 Add footnote: pre-application discussions/Local Development Plan

	viability information. Indicative Affordable Housing Requirement “34%” should be deleted and replaced by “20% subject to viability testing”
Changes sought by those submitting representations	See above.
<b>LPA's recommendations, including reasons</b>	The more detailed viability information that was supplied at candidate site stage to the Authority and confirmed during pre-application discussions in May 2018 would suggest that a figure of 34% is achievable in principal.  The more detailed viability information received referred to above can be provided for the Examination.

<b>FC23 – Table 9 Percentage of Affordable Housing for Housing Submarket Areas</b>	
LDP Section references	Housing Allocations
Representors	1569/21
Relevant content of the LDP to which the main issue relates	Table 9 Percentage of Affordable Housing for Housing Submarket Areas
LPA's summary of the deposit representation(s)	The thresholds at which the targets will apply have also been amended. We understand this is based on the ability to deliver 1 affordable unit on site and not whether the threshold is viable. This approach will be for the LPA to explain.
Changes sought by those submitting representations	
<b>LPA's recommendations, including reasons</b>	Comment noted.

## 4. Late & Invalid Representations

### Preferred Strategy

34. A total of 7 submissions were received late. The Authority's Delivery Agreement sets out the manner in which such submissions should be treated.
35. **Delivery Agreement expectations:** The Authority will only consider representations made in accordance with the relevant public notice for the consultation period. This means sending representations in writing to the National Park Authority or by email by the closing date specified in the notice.
36. To be logged as 'duly made' as a Local Development Plan representation they must specify the matters to which they relate at Pre-Deposit Consultation stage. At the Deposit Stage they should specify the matters to which they relate and the change being sought, the grounds on which they are made and, wherever possible, the test(s) of soundness to which they relate.
37. Advice on site submissions is provided under 'Developers and Agents and those proposing sites for development.'
38. Objections should specify the change sought, the grounds on which they are made and wherever possible the tests(s) of soundness to which they relate.
39. Duly made objections at Deposit Stage can be considered at Inquiry. Representations made at Pre-Deposit Stage are not considered by the Inspector.
40. If a representation is received later than the closing date and there was a clear attempt in good faith to submit in time the submission may still be considered as 'duly made' provided that appropriate objective evidence of posting or delivery is supplied to the reasonable satisfaction of the Authority.
41. Those who have a statutory right to appear before, and be heard by, the examination Inspector (i.e. objectors, those who seek a change to the plan – under Section 64(6) of the 2004 Act) may pursue their objections by using the written representation procedure if they do not wish to appear at

the examination. Objections pursued in this way carry as much weight with Inspectors as those made orally at examination. (Local Development Plan Manual Edition 2 paragraph 7.4.4.2)

42. **Outcomes:** The Pre-Deposit consultation period lasted 6 weeks starting at the beginning of February and ending on the 21st of July 2017.
43. The Authority also gave advanced notice to Town and Community Councils of the consultation.
44. Those submitting late representations were reviewed to ensure that those that showed a clear attempt in good faith to submit in time were included and acknowledged as such.
45. Where representations were classified as 'late' and not duly made the representors were advised and their details added to the mailing list. Officers also committed to review the contents of those that were late and not accepted as a formal representations in case issues of soundness needed to be addressed prior to the Plan being placed on Deposit.
46. The table below sets out the Officers' review of the submissions.

<b>Rep Number/Representor</b>	<b>Acknowledgement Type Sent</b>	<b>Next Steps</b>
4322 Mr N Horsley	Accept the reasons for lateness	Representations are now under Q1 to be addressed.
4587 Mr A Senior	Accept the reasons for lateness	Representation is under Q2.
2577 National Grid (Amec)	Not accepted but no comment anyway	No further action needed.
2897 Marloes & St Brides CC	Not accepted but agreed to review the submission in terms of soundness issues.	See comments and response below
<p><b>Comments:</b></p> <p>The Park Authority is failing its residents by not ensuring they have affordable homes as defined by Whitehall and by not ensuring they have employment opportunities. Employment should be allowed <u>in any location</u>.</p> <p>We have a declining population in the National Park because of the National Park's stated intention of not allowing the population to increase significantly. Increase population growth. The National Park Authority has been obstructive regarding the</p>		

conversion of buildings other than to holiday let. THIS MUST CEASE.

National Park purposes are out of date and the review should be referred to.

Directing new development to places with services and access to public transport is totally unacceptable.

**Response:** With these late representations the focus is primarily on the soundness tests and any issues arising which the Authority should address in order to make the Plan sound. To respond positively to many of these comments would make the Plan unsound. National planning policy is prescriptive regarding employment and where it should be located as set out in the Plan. It is also prescriptive regarding housing provision and how it should be justified. National policy also prescribes where development should be directed. The outcome of National Park review will be monitored along with another other potential changes in national policy and amendments made to the Plan as needed. The Authority has prepared a background paper on the sensitivities regarding changing national policy etc.

4333 H Pendleton

Not accepted but agreed to review the submission in terms of soundness issues.

See comments and response below.

**Comments:**

The submission comprised an extract from the British Holiday and Home Parks Association journal detailing facts and figures for holiday and touring caravan parks. The data was provided on a UK-wide basis for 2015.

**Response:** The data will be reviewed and any relevant information included in an update of the Enjoyment Background Paper to be published alongside the Deposit Plan.

4586 Dr Gibbs

Not accepted but agreed to review the submission in terms of soundness issues.

See comments and response below.

**Comments:**

Comments referred to Candidate Site 124 East of Tower Hill, Dinas Cross. Objection was raised to its development for the following reasons:

- This site is a green wedge. Plain and simple, does NOT comply with the preferred strategy. "Mitigation" just a fudge and can only incite public concern about the probity of this process.
- Road safety given the lack of space for pavements on a road popular with walkers
- Affordable housing is, without doubt, very important. But no information is

given about the actual demand for affordable housing in this village where employment opportunities are scarce.

- The amenity value of the public footpath at the border of site 124 is very much played down.

**Response:** The points made in bullets 1-3 have already been reflected in previous submissions and will be considered under Q2 representations. In respect of the 4<sup>th</sup> bullet point, the impact upon neighbouring and public amenity forms a valid material consideration which was included in the original site assessment. It will continue to be included as part of the ongoing assessment of the site.

4591 Mr & Mrs Gill

Not accepted but agreed to review the submission in terms of soundness issues.

See comments and response below.

**Comments:** Comments referred to Candidate Sites 097 and 142, which are both adjacent Ysgol Bro Dewi, St Davids. Objection was raised to development for the following reasons:

- Contrary to the two statutory purposes of the National Park;
- Would add to the traffic management issues along Nun Street;
- Would destroy valuable vistas; Glasfryn Road would meet affordable housing provision without detracting the City's special qualities;
- Development would lose the last gap along Nun Street; the site provides an important sense of remoteness and openness, a special quality that should be preserved, it would cause significant visual intrusion in the landscape and historic value;
- Development would cause significant light pollution;
- Development would disturb protected species and their habitats, particularly bats;
- Development would impact on views of the Cathedral;
- Development has previously been refused for being outside of development limits and closing the last remaining gap along Nun Street which provides important views.

**Response:** The points made in bullets 2-5 and 7 have already been reflected in previous submissions and will be considered under Q2 representations. With respect to bullet points 1, 6 and 8, they form valid material considerations which have been included in the original site assessment. No additional information accompanied this submission to alter the Authorities original view in this respect. They will continue to be included as part of any further assessment of the two sites, neither of which are proposed for allocation at this stage.

## **Deposit Plan**

47. The Deposit consultation period lasted 8 weeks starting at the beginning of February and ending on the 1<sup>st</sup> June 2018.
48. The Authority also gave advanced notice to Town and Community Councils of the consultation.
49. Those submitting late representations (3 parties) were advised that their representations were classified as 'late' and not duly made. The representations were received on the 14<sup>th</sup> of June 2018, the 20<sup>th</sup> June 2018 and the 19<sup>th</sup> of July 2018. Angle Community Council provided further evidence which resulted in the submission then being included (September 6<sup>th</sup> 2018).

<b>Rep Number/Representor</b>	<b>Acknowledgement Type Sent</b>
3686 Mr A Vaughan Harries on behalf of Mr Merrick	Not accepted as the submission was received a considerable time beyond the end date for the consultation period.
2873 Angle Community Council	Accepted as there was a misunderstanding regarding the closing date for the Deposit Plan consultation.
1456 Mrs Murphy	Not accepted as the submission was received too late and therefore was not be included as a formal response.

## **Focussed Changes**

50. Those submitting invalid representations (2 parties) were advised that their representations would not be taken forward for consideration. The submissions related to matters not consulted upon as part of the Focussed Changes consultation.

<b>Rep Number/Representor</b>	<b>Clarification Letter Sent</b>
4671/LDP/F Mr G Martyn	The submission did not relate to the matters published for consultation under the Focussed Changes consultation and therefore was not be

	considered further.
4672/LDP/F Ms Metcalfe	The submission did not relate to the matters published for consultation under the Focussed Changes consultation and therefore was not be considered further.

## 5 Conversion Chart

LDP 2 Policy Number/Policy Title LDP 2 Deposit Stage		LDP 2 Policy Number/Policy Title LDP 2 Preferred Strategy	
<b>National Park Purposes and Duty</b>			
Policy 1	National Park Purposes and Duty (Strategy Policy - overarching)	Policy 1	National Park Purposes and Duty (Strategy Policy - overarching)
<b>Spatial Strategy</b>			
Policy 2	Tenby Local Service and Tourism Centre (Tier 2) (Strategy Policy)	Policy 2	Tenby Local Service and Tourism Centre (Tier 2) (Strategy Policy)
Policy 3	Newport Local Centre (Tier 3) (Strategy Policy)	Policy 3	Newport Local Centre (Tier 3) (Strategy Policy)
Policy 4	Saundersfoot Local Centre (Tier 3) (Strategy Policy)	Policy 4	Saundersfoot Local Centre (Tier 3) (Strategy Policy)
Policy 5	St Davids Local Centre (Tier 3) (Strategy Policy)	Policy 5	St Davids Local Centre (Tier 3) (Strategy Policy)
Policy 6	Rural Centres (Tier 4) (Strategy Policy)	Policy 6	Rural Centres (Tier 4) (Strategy Policy)
Policy 7	Countryside (Tier 5) (Strategy Policy)	Policy 7	Countryside (Tier 5) (Strategy Policy)
<b>A. Special Qualities</b>			
Policy 8	Special Qualities (Strategy Policy)	Policy 8	Special Qualities (Strategy Policy)
Policy 9	Light Pollution	Policy 9	Light Pollution
Policy 10	Sites and Species of European Importance (New)		
Policy 11	Nationally Protected Sites and Species (New)		
Policy 12	Local Sites of Nature Conservation or Geological Interest	Policy 10	Local Sites of Nature Conservation or Geological Interest
Policy 13	Protection of Biodiversity	Policy 11	Protection of Biodiversity
Policy 14	Welsh Language	Policy 12	Welsh Language
Policy 15	Protection of Buildings of Local Importance	Policy 14	Protection of Buildings of Local Importance
Policy 16	Conservation of the Pembrokeshire Coast National Park	Policy 15	Conservation of the Pembrokeshire Coast National Park
Policy 17	Open Space and Green	Policy 16	Open Space and Green

LDP 2 Policy Number/Policy Title LDP 2 Deposit Stage		LDP 2 Policy Number/Policy Title LDP 2 Preferred Strategy	
	Wedges		Wedges
Policy 18	Shore Based Facilities	Policy 17	Shore Based Facilities
Policy 19	Porthgain, Saundersfoot, Solva and Tenby Harbours	Policy 18	Porthgain, Saundersfoot, Solva and Tenby Harbours
<b>B. Major Development, the Potential for Growth</b>			
Policy 20	Hazardous Installations	Policy 19	Hazardous Installations
Policy 21	Scale of Growth (Strategy Policy)	Policy 20	Scale of Growth(Strategy Policy)
Policy 22	Minerals Safeguarding	Policy 21	Minerals Safeguarding
Policy 23	Buffer Zones	Policy 22	Buffer Zones
Policy 24	Borrow Pits	Policy 23	Borrow Pits
Policy 25	Local Building Stone	Policy 24	Local Building Stone
Policy 26	Recycled, Secondary and Waste Materials	Policy 25	Recycled, Secondary and Waste Materials
Policy 27	Inactive Mineral Sites	Policy 26	Inactive Mineral Sites
Policy 28	Local Waste Management Facilities	Policy 27	Local Waste Management Facilities
Policy 29	Composting	Policy 28	Composting
<b>C. Climate Change, Sustainable Design, Flooding, Sustainable Energy</b>			
Policy 30	Sustainable Design (Strategy Policy)	Policy 29	Sustainable Design (Strategy Policy)
Policy 31	Amenity	Policy 30	Amenity
Policy 32	Minimising Waste	Policy 31	Minimising Waste
Policy 33	Surface Water Drainage	Policy 32	Surface Water Drainage
Policy 34	Renewable Energy (Strategy Policy)	Policy 33	Renewable Energy (Strategy Policy)
Policy 35	Flooding and Coastal Inundation (Strategy Policy)	Policy 34	Flooding and Coastal Inundation (Strategy Policy)
Policy 36	Development in the Coastal Change Management Area	Policy 34A	Development in the Coastal Change Management Area
Policy 37	Relocation of existing permanent dwellings affected by coastal change	Policy 34B	Relocation of existing permanent dwellings affected by coastal change
Policy 38	Relocation and replacement of development (other than residential) affected by coastal change	Policy 34C	Relocation and replacement of development (other than residential) affected by coastal change
<b>D. Visitor Economy, Employment</b>			
Policy 39	Visitor Economy (Strategy Policy)	Policy 35	Visitor Economy (Strategy Policy)

LDP 2 Policy Number/Policy Title LDP 2 Deposit Stage		LDP 2 Policy Number/Policy Title LDP 2 Preferred Strategy	
Policy 40	Loss of Hotels and Guest Houses	Policy 36	Loss of Hotels and Guest Houses
Policy 41	Self-Catering Development	Policy 37	Self-Catering Development
Policy 42	Caravan, Camping and Chalet Development	Policy 38A	Caravan, Camping and Chalet Development
Policy 43	Site Facilities on Tent, Chalet and Caravan Sites	Policy 40	Site Facilities on Tent, Chalet and Caravan Sites
Policy 44	Employment Sites and Live/Work Units (Strategy Policy)	Policy 42	Employment Sites and Live/Work Units (Strategy Policy)
Policy 45	Protection of Employment Sites and Buildings	Policy 43	Protection of Employment Sites and Buildings
Policy 46	Agricultural Diversification	Policy 43A	Agricultural Diversification
<b>E. Affordable Housing and Housing</b>			
Policy 47	Housing (Strategy Policy)	Policy 44	Housing (Strategy Policy)
Policy 48	Housing Allocations	Policy 44A	Housing Allocations
Policy 49	Affordable Housing (Strategy Policy)	Policy 45	Affordable Housing (Strategy Policy)
Policy 50	Housing Densities and <u>Mix</u>		
Policy 51	Gypsy Traveller and Showpeople Sites	Policy 46	Gypsy Traveller and Showpeople Sites
Policy 52	One Planet Development	Policy 47	One Planet Development
<b>F, Community Facilities, Retailing, Transport</b>			
Policy 53	Community Facilities and Infrastructure Requirements (Strategy Policy)	Policy 48	Community Facilities and Infrastructure Requirements (Strategy Policy)
Policy 54	Retail in the National Park (Strategy Policy)	Policy 49	Retail in the National Park (Strategy Policy)
Policy 55	Town and District Shopping Centres	Policy 50	Town and District Shopping Centres
Policy 56	Garden Centres	Policy 51	Garden Centres
Policy 57	Sustainable Transport (Strategy Policy)	Policy 52	Sustainable Transport (Strategy Policy)
Policy 58	Impacts of Traffic	Policy 53	Impacts of Traffic
Policy 59	Cycleways	Policy 54	Cycleways
Policy 60	Powerlines and Pipelines	Policy 55	Powerlines and Pipelines
Policy 61	Telecommunications	Policy 56	Telecommunications

## 6. Next Steps

51. The table below sets out the Delivery Agreement expectations for feedback following the consultation.

<b>Delivery Agreement expectations</b>	<b>Outcomes</b>
At the conclusion of significant stages in Local Development Plan preparation feedback will be provided on representations made by:	
<ul style="list-style-type: none"> <li>▪ Acknowledgement letter or e-mail providing contact details and details on how the Authority will deal with the representation.</li> <li>▪ Advice on how late/invalid representations will be treated is set out in the next section.</li> </ul>	<p>Details on how the representations would be dealt with were included in the letter of consultation which was included in the consultation mail out and in the acknowledgement.</p> <p>All submissions were acknowledged by letter or email with contact details.</p>
<ul style="list-style-type: none"> <li>▪ Written feedback on responses to representations to each respondent and an outline of what the next steps will be either by email or direct mailings.</li> </ul>	<p>Provided following formal approval of the National Park Authority response in March 2018 and November 2018.</p>
<ul style="list-style-type: none"> <li>▪ Petitions received will be acknowledged in the same way to the presenter of the petition.</li> </ul>	<p>Petitions were not received on the pre-deposit consultation.</p> <p>2 Petitions were received on the Deposit Local Development Plan.</p>
<ul style="list-style-type: none"> <li>▪ The Authority's website: <a href="http://www.pembrokeshirecoast.org.uk">www.pembrokeshirecoast.org.uk</a> will also provide regular updates.</li> </ul>	<p>The website was refreshed in advance of formal consultations.</p>

52. The table below identifies the stages in the process and at what stage plan preparation is currently at.

<b>Stage</b>	<b>Replacement Plan Complete by (considerably less than 4 years)</b>
Review Report	June/July 2016
Delivery Agreement	June/July 2016

<b>Stage</b>	<b>Replacement Plan Complete by (considerably less than 4 years)</b>
Pre-Deposit participation	June/July 2016 – February 2017
Pre-Deposit consultation	June/July 2017
Deposit	March 2018
Submission to Welsh Government	December 2018
Focussed Changes	Consultation ended 15 February 2019
Examination	Spring 2019
Adoption	End of 2019

**We are here** 

53. The next steps will be to progress the Plan through Examination.

## References

[Pembrokeshire Coast National Park - Background Papers](#)

[Pembrokeshire Coast National Park - Community Council Workshops](#)

[Pembrokeshire Coast National Park - National Park Authority meetings](#)

[Pembrokeshire Coast National Park - Delivery Agreement](#)

[Pembrokeshire Coast National Park - LDP Review Report](#)

[Pembrokeshire Coast National Park - Appraisal Processes](#)

[Pembrokeshire Coast National Park - Preferred Strategy](#)

[Pembrokeshire Coast National Park - Candidate Site Register](#)

[Pembrokeshire Coast National Park - Initial Consultation Report](#)

[Pembrokeshire Coast National Park – Deposit Plan](#)

Pembrokeshire Coast National Park – Consultation Report

<http://www.pembrokeshirecoast.wales/default.asp?PID=876>

Pembrokeshire Coast National Park – Submission Page

<http://www.pembrokeshirecoast.wales/default.asp?PID=875>

Weblinks checked 6<sup>th</sup> November 2018