


Local Development Plan 2 Pembrokeshire Coast National Park – Matters Arising Changes - Consultation Report Second Addendum

Appendix 1 - copy of each representation in full in numerical order.

 = representation of support

 = Main Issue **not already** listed in the main Consultation Report

| Number | Representor – number and name       | Matters Arising Change Reference | Support Object   | Summary of Comment/Suggested Change by the Representor  | Officer Response (Agree/Disagree/Compromise) Pre-Examination contact   | Examination Written or Speak Welsh Language |
|--------|-------------------------------------|----------------------------------|--|---|--|---|
| 1.     | 4672 Mrs Metcalfe                   | MAC 5                            | Objection  | The thorough examination of impacts on noise from wind turbines needs to be committed to in the Plan. Detailed advice is provided. Also increased bird and bat mortality is occurring and needs to be avoided. Strong safeguards are required.  | This Matters Arising Change provides a summary of the overall strategy of the Plan and this representation appears to be dealing with more detailed matters which is outside the scope of the change.<br><br>(It may be useful to note that issues regarding noise and impacts on biodiversity would in any case be dealt with by other policies of the Plan - see reasoned justification to the Policy on Renewable Energy.)  | Written.                                    |
| 2.     | 4672 Mrs Metcalfe                   | MAC 5                            | Objection  | The Plan needs to recognise the need to control and remove invasive species. This is especially true of skunk cabbage which is infesting the Abermawr Marsh.  | This Matters Arising Change provides a summary of the overall land use planning strategy of the Plan and this representation appears to be dealing with more detailed matters which is outside the scope of the change and land use planning.<br><br>(It may be useful to note that this particular species has been under investigation by Natural Resources Wales. A message has been passed onto Natural Resources Wales regarding Abermawr as referred to in the representation. The Authority has also dedicated resources to the clearance of certain invasive species).                       | Written                                     |
| 3.     | 2577 Avison Young for National Grid | General                          | No Comment   | No comment is being made on the consultation.   | Noted.   | N/A   |
| 4.     | 3372 Hales for Raymond & Raymond    | MAC 65                           | Object   | The increase in the level of affordable housing for HA 5 required from 10% to 34% would not be viable. Further detail is provided.  | This representation relates to the original representation submitted on a Focussed Change to the Plan which is no longer available for comment.<br><br>(It may be useful to note the Authority prepared a response to the question of viability – see representation number 16 on the Focussed Changes consultation. <a href="https://www.pembrokeshirecoast.wales/Files/files/Dev%20Plans/LDP2/Focussed%20Changes/Focussed%20Changes%20Responses%20Table.pdf">https://www.pembrokeshirecoast.wales/Files/files/Dev%20Plans/LDP2/Focussed%20Changes/Focussed%20Changes%20Responses%20Table.pdf</a> ) | Written                                     |
| 5.     | 3372 Hales for Raymond & Raymond    | MAC 70                           |  Support | New Policy 49 is supported since the varying percentage requirements for on site affordable housing provision in each of the different sub market areas listed reflects the level of market housing values in each sub-market area and the ability of the market housing in those sub-market areas to cross subsidise the provision of affordable housing. The 20% affordable housing requirement for sites in St Brides Bay sub-market area which includes Broad Haven is supported since market housing values in Broad Haven are not sufficiently high to support a general level of affordable housing provision any greater than 20% even on sites with no exceptional site development costs. Development of housing sites need to be viable in order for the affordable housing element to be deliverable. | Noted.   | Written                                     |

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| 6.     | 3372 Hales for Raymond & Raymond     | MAC 90   | Object            | New information is provided regarding constraints, how they are being dealt with and some costs.  | At this point these issues would need to be considered as and when a proposal is progressed through the planning application process. The Appendix to the Plan does reflect the fact that the information is at a point in time. The commentary on progress is encouraging.   | Written                                     |
| 7.     | 4675 Mr Clements                     | MAC 10   | Object            | Representation relates to the proposed development of 68 dwellings at Sandy Hill Saundersfoot. It details issues regarding servicing the site and the appropriateness of the site's inclusion.  | Some of the content of representation relates to the proposed content of what will be in Appendix 4 of the Plan – 'Requirements for Housing Allocations and Large Windfall Sites' - MAC 98. Appendix 4 to the Plan provides a summary of what are considered to be the more unique requirements for sites. There will be more detailed requirements for example in relation to electricity supply. More detail can be found in a separate report, the <a href="#">Land Implementation Study</a> which was submitted to the Inspector and can be viewed as part of the Plan's evidence base. The Sandy Hill site is referred to on page 13 of the Report.  | Written                                     |
| 8.     | 4518 Cadw                            | MAC 28   | No issues raised. | Whilst the policy on locally listed buildings has been deleted this is a local matter and will not make the plan unsound. In fact the overall policies strengthen the protection of the Historic Environment and it is good to see that there is a policy that means planning contributions can include archaeology and the historic environment. Therefore we can see no issues that make the plan unsound.  | Noted.  | No specified                                |
| 9.     | 1663 Welsh Water                     | General & MAC 42 & MM 19 & MAC 98 (Table on Housing Allocations & Large Sites) | Support           | Many thanks for consulting Welsh Water on the Matters Arising Changes (MAC) consultation.<br><br>We have nothing specific to say other than we support the proposed MACs, in particular MAC42 and MM19. We also welcome the inclusion of Table 1 (Housing Allocations and large sites – site requirements) in Appendix 1, in particular the 'Design and Infrastructure Requirements' column.  | Noted.  | Not specified                               |
| 10.    | 2903 Nolton & Roch Community Council | MAC 47   | Object            | 47 - All policies around renewable energy we believe have to start from a point of positivity and encouragement and this MAC does not go far enough - what does 'unacceptable adverse effect' on the visual amenities, landscape character and/or nature conservation value of the local area actually amount to? Of course, solar or wind will have an impact on the visual amenity, that is a fact, but should not and cannot be a reason to be able to refuse this renewable option. All small scale, especially single wind turbines and personal solar use should be encouraged for all residents. | The amendment to this Policy has been made to clarify the renewable energy technologies (type and scale) that are appropriate in the National Park. The Policy states that renewable and low carbon energy applications will be permitted where proposals have demonstrated that measures have been taken to minimise impacts on the landscape and natural environment of the National Park. This policy, along with other policies in the Plan provides the policy context to consider all relevant effects of renewable energy proposals. The term 'unacceptable adverse effect' is explained in the Glossary of Terms. It is understood that there will be a degree of impact but this should not be unacceptably harmful in spite of mitigation. There is also a suite of supplementary planning guidance documents to help inform decision makers. The Authority's Renewable Energy Supplementary Planning Guidance guides proposers to where and what type of development would be appropriate. | Written                                     |

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| 11.    | 2903 Nolton & Roch Community Council | MAC 50                           | Object         | 50 - there is great concern that this MAC will result in the complete loss of our coastal settlements. The previous wording of 'appropriate distance' was far preferable - common sense must prevail. Placing every relocated development too inland leaves us in danger of leaving whole communities without a livelihood they've always known and a loss of coastal tourism.                            | The amendment has been made to clarify the intent of the policy. The words 'where possible it is in a location that is close to the coastal community from which it was displaced' remain in the Policy wording in order to help maintain geographical proximity of communities affected by coastal change.   | Written                                     |
| 12.    | 3569 Mr A Jones                      | MAC 98                           | Object         | I wish to comment on the Matters Arising Changes to LDP2 reference Site 031 or HA 3 (Page (92) as requested and prior to March 13th. 2020.<br><br>Representation relates to the proposed development of North of Whitlow (Candidate Site Reference 031A) HA3. It details the appropriateness of the site's inclusion.   | Some of the content of representation relates to the proposed content of what will be in Appendix 4 of the Plan – 'Requirements for Housing Allocations and Large Windfall Sites' - MAC 98. Appendix 4 to the Plan provides a summary of what are considered to be the more unique requirements for sites. There will be more detailed requirements for the site. More detail can be found in a separate report, the <a href="#">Land Implementation Study</a> which was submitted to the Inspector and can be viewed as part of the Plan's evidence base. The appropriateness of the site's inclusion in the Local Development Plan has been discussed at Examination. | Not specified                               |
| 13.    | 3617 Coal Authority                  | General                          | No comment.    | I have reviewed the changes proposed and can confirm that we have no specific comments to make.   | Noted.  | N/A   |
| 14.    | 1670 Natural Resources Wales         | MAC 5                            | Comment        | MAC 5 2nd "New paragraph", page 16 – The sentence which reads "restricting new development will be encouraged in locations where there is a long-term strategy to allow the sea or river to inundate or flood" needs to be changed as it does not make sense. It should either state "no new development in locations where there is a long-term strategy..." or remove the wording "will be encouraged". | Agree to the deletion of the words 'will be encouraged'.  | Not specified                               |
| 15.    | 1670 Natural Resources Wales         | MAC 19                           | Comment        | MAC 19, page 24 – We agree that lighting should be identified at the outset of a scheme, however it would strengthen the sentence if it read "should be provided" at the outset.  | Agree to re-placing the word 'identified' with the word 'provided'.   | Not specified                               |
| 16.    | 1670 Natural Resources Wales         | MAC 20                           | Agree          | MAC 20 and MAC 21, page 25 - We agree with the changes they provide clarity.  | Noted.  | Not specified                               |
| 17.    | 1670 Natural Resources Wales         | MAC 36, MAC 37 and MAC 39        | Support        | MAC 36, MAC 37 and MAC 39 – We support the reference to Policy 10 in these policies.  | Noted.  | Not specified                               |
| 18.    | 1670 Natural Resources Wales         | MAC 42                           | Comment        | MAC 42, paragraph 4.156 – The wording "water resources" should be changed to "water quality", "water quality is a material planning consideration".   | Agree to the change proposed.   | Not specified                               |

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| 19.    | 1670 Natural Resources Wales  | MAC 49  | Support.                          | MAC 49 and MAC 50 – We support the proposed changes.   | Noted.  | Not specified                               |
| 20.    | 1670 Natural Resources Wales  | MAC 52  | Support                           | MAC 52 – We support reference to Policy 10 in this policy.   | Noted.  | Not specified                               |
| 21.    | 1670 Natural Resources Wales  | MAC 88  | Comment                           | MAC 88 – New policy, infrastructure requirements. 1st paragraph – This paragraph refers to the provision of infrastructure to be secured by planning conditions or planning obligations. When infrastructure means the public foul sewer, you almost always require that a connection to the main sewer is established prior to any decision at the planning application stage, as a securing it as a condition is sometimes too late. This paragraph should be amended to reflect this. | <p>Planning authorities should ensure that any proposed development has satisfactory provision for dealing with sewage. This has been done in this Local Development Plan by proposing that development should be located so that it can be well serviced by existing or planned infrastructure.</p> <p>A developer is expected to demonstrate that adequate arrangements will be provided for sewerage; the local planning authority may impose appropriate planning conditions to secure adequate provision (for example, it may be appropriate to grant permission with a condition such as: 'No development shall commence [on the site] until the sewerage [or specify service infrastructure] system in the locality has been upgraded in accordance with [document reference].' The local planning authority would have to be satisfied that some reasonable prospect existed that the sewerage system would be sufficiently improved or provided before the proposed occupation of the houses.) or refuse permission if it is not confident that suitable arrangements will be made by the developer.</p> | Not specified                               |
| 22.    | 1670 Natural Resources Wales  | MAC 89  | Support. Request to be consulted. | MAC 89 – Planning Obligations SPG – We note that this SPG will be prepared to support the policy and we would wish to be consulted on it.  | Support noted. Natural Resources Wales is a standard/statutory consultee on supplementary planning guidance.  | Not specified                               |
| 23.    | 1670 Natural Resources Wales  | MAC 96  | Request to be consulted.          | MAC 96 – Appendix 11 Supplementary Planning Guidance – We request to be consulted on any emerging SPGs.  | Agreed. Natural Resources Wales is a standard/statutory consultee on supplementary planning guidance.   | Not specified                               |
| 24.    | 1670 Natural Resources Wales  | Table 2 Minor Amendments                                | No comment.                       | Table 2 Minor Amendments<br>We have no comments to make on the proposed minor amendments.  | Noted. (Please note that the table was not available for comment)   | Not specified                               |
| 25.    | 1670 Natural Resources Wales  | Addendum to the Sustainability Appraisal Report October | Agree                             | Addendum to the Sustainability Appraisal Report October 2019<br>We have reviewed the above document and confirm that we agree with the conclusion that no implications on the overall Sustainability Appraisal of the Local Development Plan were identified.  | Noted.  | Not specified                               |

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|        |                               | 2019  |                  |   |   |   |
| 26.    | 1670 Natural Resources Wales  | Addendum to the Shadow Habitats Regulations Assessment October 2019 | Agree            | Addendum to the Shadow Habitats Regulations Assessment October 2019<br>Having reviewed the above document we confirm that we agree with the conclusion that none of the proposed matters arising or minor changes are considered to result in any likely significant effects on European protected sites at all. There are no residual effects and no further assessment in combination with other plans or projects is considered necessary. | Noted.  | Not specified                               |
| 27.    | 3391 Pattenden                | MAC 98  | Concerns set out | Representation relates to the proposed development of allocated sites in Saundersfoot. It details issues regarding the appropriateness of the sites' inclusion and the manner in which they will be developed.  | MAC 98 proposes the inclusion of Appendix 4 to the Plan (included as Appendix 13 in the Matters Arising Changes Document) regarding the requirements for the site's development. The appropriateness of the sites' inclusion and the manner in which they should be developed has been discussed at Examination. The Authority has no further comment.  | Not specified                               |
| 28.    | 4676 Pert Holmes              | MAC 64 & MAC 65   | Object.          | Representation relates to the non-inclusion of the land being shown as 'land with planning permission' nor as an allocation for residential development in LDP2. It details the dates the Authority resolved to grant permission for the development of the site and the subsequent legal agreement.  | Following discussion of residential site allocations at the Examination Hearings, the Inspector requested details of all large (5 or more units) housing sites with planning permission. This site at St Davids (ref NP/18/0488) was included in the list of sites as having a resolution to grant permission by 31/03/2019 but pending a legal agreement. The Authority advised the Inspector that delivery of the site would be dependent on whether a change was made to the Plan to include the site within the Centre boundary for St Davids. It is the Authority's opinion that the site would be likely to come forward within the timescales advocated by the respondent if the site remains outside of the Centre boundary. (See Hearing Session 6, Action Point 3). The existence of the current planning permission is not disputed. The land was not re-allocated in the Deposit LDP2 and no objection was received as to its non-inclusion at that time. The Authority has no further comment. | Speak                                       |
| 29.    | 4577 Wigley Jones             | Not specified   |                  | Re: LDP II - Proposals Map C 38 Square and Compass, Croesgoch Pembrokeshire<br>Include our clients' modest garden and large building. More detail is provided as to the reasons why it should be included.  | This representation relates to an issue that has not been the subject of a valid objection to Deposit Local Development Plan 2 or any proposals set out in the Matters Arising Changes.   | N/A   |
| 30.    | 339 S Bayes                   | MAC1  | Object           | A detailed submission is provided. The change sought is:<br>The Age of the WSP should be highlighted. More emphasis should be given to the wellbeing of communities throughout the Plan   | The purpose of this Matters Arising Change is to provide a summary of the Plan's Strategy rather than provide an opportunity to revisit the strategy.<br><br>The Authority's evidence regarding the derivation of the Plan's Strategy has been provided in Hearing Session 1 and the background documents to the Plan. The Authority considers that the approach taken to be sound as it has regard to national policy and the Wales Spatial Plan, the Well-being Goals etc. As the Plan progressed towards Examination regard was had  | Speak                                       |

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|        |                               |                                  |                |  | to new strategies as they came available.   |   |
| 31.    | 339 S Bayes                   | MAC 18 & MAC 19                  | Object         | <p>A detailed submission is provided. The change sought is:</p> <p>Policy 9– <i>“Light Pollution Proposals that are likely to result in a significant level of artificial light being emitted shall include a full lighting scheme and will be permitted:...”</i></p> <p>Policy 9 should read – <i>“Light Pollution Proposals that are likely to result in a significant level of artificial light being emitted shall include a full lighting scheme and will be permitted:...”</i></p> <p>4.70 should read <i>“This policy is intended to conserve parts of the Pembrokeshire Coast National Park which are still relatively undeveloped, with minimal impact of lighting on the night sky. Schemes should carefully relate any lighting proposed to its purpose and minimise the impact on adjoining areas through the use of appropriate means of lighting, careful design and the minimal possible lighting levels. <b>Design of fenestration, particularly those involving large areas of glass, should minimise the impact of internal artificial lighting on the surroundings</b>”</i></p> | <p>The purpose of the Matters Arising Change was to clarify the terms used in the Policy.</p> <p>The representation as submitted appears to stray beyond the Matters Arising Change. That said proposals which are light emitting and can be controlled through the planning system would be subject to the application of the policy as proposed in Local Development Plan 2.</p>  | Speak                                       |
| 32.    | 339 S Bayes                   | MM2                              | Object         | <p>A detailed submission is provided. The change sought is:</p> <p>Where PPW is first mentioned - under “National Planning Policy”</p> <p>Instead of just saying <i>“The Local Development Plan should therefore be considered in conjunction with the Planning Policy Wales, Edition 9, November 2016, 10 December 2018 which identifies those areas where clear statements of national development control policy should not need to be repeated in Local Development Plans”</i>, explain the new ethos and thrust of PPW10 in reflecting the WFG Act, how it does this, and add mention of Pembrokeshire’s Wellbeing Plan.</p>  | <p>This representation relates to Table 2 of the Matters Arising Changes which are not available for comment.</p> <p>(It may be useful to note that the Authority’s evidence regarding the derivation of the Plan’s Strategy and compatibility with National Planning Policy has been provided primarily in Hearing Session 1. The implications of Planning Policy Wales Edition 10 for the Plan are set out in Exam05 and Exam06 and are also set out in the Matters Arising Changes.)</p>   | Speak                                       |
| 33.    | 339 S Bayes                   | MAC 3                            | Object         | <p>A detailed submission is provided. The change sought is:</p> <p>Under <i>“Priority C - Climate change, sustainable design, renewable energy, flooding”</i></p> <p>LDP2 should instead state</p> <p><i>“The strategy and key policies will: ensure that <del>at the end of the Local Development Plan period</del> new development will be <del>more</del> sustainable in design”</i>.</p>   | <p>The Authority’s evidence to Examination regarding the derivation of the Plan’s Strategy has been provided primarily in Hearing Session 1 to the Plan. The Authority considers that the approach taken to be sound as evidenced through the Examination process.</p> <p>The Authority’s evidence to Examination regarding housing has been provided primarily in Hearing Session 1 along with Sessions 6,7,8 and 9. The Authority considers that the approach taken to be sound as evidenced through the Examination process.</p> | Speak                                       |

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|        |                               |                                  |                | <p>Under "Priority E -</p> <p>LDP2 should instead state</p> <p><i>"How to tackle housing need in the National Park</i></p> <p><i>The strategy and key policies will encourage sustainable communities through development in a location, and of a scale and nature - including tenure, mix and design - identified as being appropriate for each settlement."</i></p>   |  |   |
| 34.    | 339 S Bayes                   | MAC 71                           | Object         | <p><b>All emphasis is my emphasis throughout</b></p> <p>♣<i>New Paragraph -The requirement for affordable housing in that LHMA (2014) stated an annual need for...</i></p> <p>LHMA 2014 was an update only of LHMA 2012 The information is 6 years old and it is astounding that it should be used as a basis for policy in 2020</p> <p>The proposed text change states that</p> <p><i>"LHMA gives an annual need for 1450 affordable rented properties for the 5 years to 2019; and 289 affordable dwellings to purchase over the same period across Pembrokeshire..."</i></p> <p>What value is that for an LDP, <b>yet to be adopted in 2020 with an end date 2031?</b></p> <p>The up to date Draft Pembrokeshire Local Housing Market Assessment 2019 is on the PCC website</p> <p><i>New paragraph - The majority of affordable rented need identified in the Local Housing Market Assessment, and supported by regular reviews of the Combined Housing Register, is for one bedroom units (80%); with the remainder spread across two, three, four and five bedroom properties. This is because of a general lack of provision of one bedroom units across the county due to historical Amendment necessary to make clear the detailed requirements of the policy. HS7/AP3 51 Matters Arising Change number Plan/Map Booklet reference Change proposed Reason/Justification (Action Point Reference) development. The provision of one- bedroom units would therefore need to be the primary consideration on smaller sites. However it would not be appropriate to deliver this level of one bedroom units (80%) on larger affordable housing sites where a mixed community would be the aim. This is taken into consideration when new social housing developments are delivered by Registered Social Landlords.</i></p> <p><i>New paragraph - Affordable rented units account for over 83% of need identified in the LHMA, with the remainder showing a need for Low Cost Home Ownership (or similar scheme). The requirement for affordable homes to purchase needs to take into consideration the availability of support for the purchase of properties at affordable levels, through schemes such as Homebuy, Rent to Own and Shared Ownership.</i></p> | <p>The Authority's evidence to Examination regarding housing has been provided primarily in Hearing Session 1 along with Sessions 6,7,8 and 9. The Authority considers that the approach taken to be sound as evidenced through the Examination process.</p> <p>The draft LHMA referred to in the representation (and at Examination) remains in draft and has not been finalised. When finalised it can assist in guiding future housing development in the National Park under the 'Housing Mix Policy' and the 'Affordable Housing' Policy.</p> | Speak                                       |

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|        |                               |                                  |                | <b>4.291♣ The affordable housing target will not meet the need set out in the Local Housing Market Assessment. This is because the need forecast is greater than housing land supply can deliver.</b>   |   |   |
| 35.    | 339 S Bayes                   | MAC 4 & MAC 5                    | Object         | <p>A detailed submission is provided. The change sought is:</p> <p>The National Park needs to take into account up to date evidence of need as it applies to individual communities and their sustainable development, not as it applies to the whole Park area and not just for affordable housing, in developing strategy.</p> <p>The National Park needs to actively encourage place planning and work with each community in this to determine housing and other needs.</p> <p>Newport's current Employment Allocation should remain to comply with stated employment strategy.</p>   | The Authority's evidence to Examination regarding the derivation of the Plan's Strategy has been provided primarily in Hearing Session 1 to the Plan. The purpose of the Matters Arising Change is to provide a summary of the strategy rather than revisit its content.  | Speak                                       |
| 36.    | 339 S Bayes                   | MAC 80                           | Object         | <p>A detailed submission is provided. The change sought is:</p> <p>In PCNPA LDP2</p> <ul style="list-style-type: none"> <li>• The requirement for a minimum of 30 dwellings per hectare should be reduced to 20</li> <li>• Space standards should increase to at least those in the PCC Deposit Plan, accommodating PCC's up to date recycling measures and ULEV charging points, some space for mobility scooters..</li> <li>• A proportion of all new homes up to 100% should be built to lifetime standards</li> <li>• It should be made clear that mix in market housing include starter homes, live work units and self build opportunities to enable provision of homes that meet the wellbeing needs as appropriate to each community</li> </ul> | <p>The purpose of the Matters Arising Change is to provide the basis for considering evidence of housing need to assist in housing provision.</p> <p>The Authority's evidence regarding density, space standards and mix has been presented to Examination. The Authority has no further comment.</p> <p>The policy provides a framework to consider new evidence such as new Local Housing Market Assessments to provide evidence on house sizes, types and tenures. Building Regulation requirements may also change over time. Issues of viability would also need to be considered.</p> | Speak                                       |
| 37.    | 339 S Bayes                   | MAC 9                            | Object         | <p>A detailed submission is provided. The change sought is:</p> <p><b>Policy 3a)</b> should state</p> <p><i>“to provide for and or permit housing to encourage a sustainable community through development in locations, and of a scale and nature - including tenure, mix and design - identified as being appropriate for Newport.. The occupancy of all new housing is restricted to those who would make it their main or principal place of residence”</i></p>   | The suggested change appears to relate to matters beyond the scope of MAC9 which was to update a cross reference.   | Speak                                       |



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| 38.    | 339 S Bayes                   | MAC 99 & MAC 100                 | Object         | <p><b>All emphasis is my emphasis</b></p> <p><i>“At the 2011 Census the National Park had one of the highest rates (27.7%) of second/holiday home use of its general housing stock in England and Wales. This is likely to impact negatively on the affordability of housing, and support for local facilities. Holiday homes are also a significant element of the tourism economy of the National Park”.</i></p> <p>This statement, giving only the rate <b>for the whole Park</b>, reflects the National Park’s reluctance to plan for the sustainability of individual communities. Already in 2011, Newport had over 37% of households with no usual resident, and in addition over 39% of residents over retirement age, and only 5% between the ages of 18 and 24 compared with nearly double that nationally.</p> <p>There is no need for the potential indicator <u>Number of homes on the Council Tax database subject to the second home premium</u>. What matters most to sustainability is the proportion of vacant properties for large parts of the year i.e. of households with no usual resident.</p> <p>There is need to set a trigger threshold of the proportion of households with no usual resident <b>for each centre</b>, above which percentage a principal residence policy for all new housing should be introduced.</p> | <p>These comments were addressed during the examination process (Hearing Sessions 1, 6 and 10).</p> <p>Disagree. The Council Tax data, in our opinion, provides the most robust and frequently updated indication of occupancy of newly built properties. The portion of development that the planning has some influence over, the Authority has no influence or control over existing properties. Households with no usual resident is a statistic from the Census, which only occurs every 10 years.</p> <p>Disagree. A plan review can only be triggered by Local Development Plan Indicators, since there is no policy for principal residence there are no LDP indicators for it. The <u>potential</u> indicators listed will only inform commentary on the Sustainability Appraisal against the relevant objective.</p> <p>Regarding thresholds and triggers. Questions would arise about the use of thresholds/triggers and associated expectations regarding what the land use planning response should be. Finding out that there are a number of new build second homes coming through from monitoring may not mean from the Authority’s perspective that the preferred land use planning response should be to introduce a principal residence policy. The Authority would not wish to prejudge what an appropriate land use response would be and would wish to explore policy options through next Plan review.</p> | Speak                                       |

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|        |                               |                                  |                | <p>The potential indicator “Percentage of new housing that is affordable” should be changed to “Percentage of new housing that is affordable” Again there should be a target figure for <b>each centre</b>.</p> <p>Including numbers of retail outlets in counting <i>Number of community facilities / services</i> can give misleading results as they are propped up by visitors and do not reflect community sustainability for large parts of each year</p> <p>The context for these concerns is provided by the Principal Residence and Local Connections Policy Background Paper (2019).</p>   | <p>Disagree. The Authority has no control over existing private housing stock or the housing market.</p> <p>Retail is available to both residents and visitors. It is helpful if visitors can keep retail facilities viable for residents.</p> <p>This background paper is not the subject of the Matters Arising Changes Consultation. The comments here were discussed during the Examination process.</p> |   |
| 39.    | 339 S Bayes                   | MAC 18                           | Object         | <p>Proposed alternative policy</p> <p><i>“Significant or disturbing levels of artificial lighting being emitted into the landscape shall require a lighting scheme and will be permitted:...”</i></p>  | <p>The purpose of the Matters Arising Change was to clarify the wording of the existing policy. The proposed wording uses the word ‘disturbing’ which is difficult to explain.</p>   | Speak                                       |
| 40.    | 339 S Bayes                   | MAC 79                           | Object         | <p><i>“Residential development proposals will be permitted <b>where the residential density is a minimum of 30 dwellings per hectare</b>. Lower density levels will only be permitted where it can be demonstrated that:...”</i></p> <p>Extracts from PCC Deposit Plan</p> <p><i>“Key issues and drivers:</i></p> <p><i>Respecting the benefits of green spaces and their contribution to wildlife, habitats, biodiversity and sense of place and where possible, ensuring that this is reflected in the density of new housing development.”</i> Page 22</p> <p><i>“3.16 Where opportunities exist to promote connectivity of habitats, the Development Sites and Infrastructure SPG identifies particular areas of sites that should be designed as garden spaces or green buffers. In rural areas a lower density figure has been assumed on allocations to enable such provision.”</i></p> <p><i>“3.12 Across the allocated sites opportunities to both maintain and enhance biodiversity are set out in the Development Sites and Infrastructure Supplementary Planning Guidance. <b>A density of 20 dwelling per hectare has been assumed across Housing Allocations in Service Centres and Service Villages</b> to reflect the smaller developable site area that will exist as a result of these requirements and the requirements of Sustainable Drainage Systems.”</i> Page 28</p> | <p>The suggested change appears to relate to matters beyond the scope of MAC79. See also the Authority’s commentary in relation to the representation submitted on MAC80.</p>  | Speak                                       |

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|--------|--|----------------------------------|----------------|---|--|---|
| 41.    | 1092 Litchfields on behalf of Bourne Leisure | MAC5 and MAC38                   | Support        | <p>Bourne Leisure endorses the new paragraph to Policy 1 concerning the visitor economy. The new paragraph ensures all-year round tourism and the careful management of new and existing tourism accommodation and facilities is a focus of the emerging LDP's strategic policy. However, this is only supporting text and does not provide the strategic policy needed for delivery.</p> <p>To ensure this strategy forms part of the LDP's growth policy, an emphasis on the importance of the visitor economy (as seen within the supporting text to Policy 1) needs to be incorporated into the heart of Policy 21 'Scale and Growth Policy', not solely as supporting text to Policy 1. This point has also been emphasised within representations submitted on behalf of Bourne Leisure in relation to Policy 21 (MAC38).</p>   | <p>Support for MAC5 is noted.</p> <p>Please see the representation made by Litchfields on behalf of Bourne Leisure on MAC38 for the Authority's response.</p> <p>Please note the text follows Policy 1 rather than being its reasoned justification.</p>   | Speak                                       |
| 42.    | 1092 Litchfields on behalf of Bourne Leisure | MAC22                            | Object         | <p>Bourne Leisure has undertaken a wide range of projects where nature conservation interests need to be considered and enhanced biodiversity at its parks. Bourne Leisure endorses the recognition that in some cases there may be adverse impacts but that these can be mitigated with no overall impact upon the integrity of the site.</p> <p>The MAC includes a new paragraph to emerging Policy 12, after paragraph 4.74</p> <p>In assessing a development proposal it will be important that areas considered to form a non-designated area of local nature importance are demonstrated to have these functions [as set out in the new paragraph]. Not all such areas are of the same quality nor make the same contribution. For example, land buffering sites of importance may not contribute at all to sustaining habitats and species of importance. There is a need to ensure that the draft paragraph is proportionate in its application to the significance of the designation and the level of contribution made to the area to ensure the policy is appropriate (second test of soundness).</p> | <p>MAC22 has been made to clarify what is meant by 'areas of importance for local nature conservation'. The policy wording allows a proportionate approach to be taken when considering development proposals in such locations.</p> <p>The Authority has no further comment.</p>  | Speak                                       |
| 43.    | 1092 Litchfields on behalf of Bourne Leisure | MAC26                            | Object         | <p>Bourne Leisure welcomes the introduction of certainty in how this policy [Policy 14 – Development in Welsh Language Sensitive Areas] will be applied. The proposed criteria are considered to represent a proportionate approach to promoting and supporting the use of the Welsh language in relation to new development.</p> <p>However, the proposed text forming draft Policy 14 introduces ambiguity. The MAC introduces criteria for Welsh language sensitive areas but as drafted could be interpreted to apply to all 'major' development applications regardless of where they are located across Pembrokeshire Coast National Park. This is not proportionate and is not justified by the evidence base prepared, nor in line with our reading of the purpose of the changes. The ambiguity fails both test 2 of the test of soundness i.e. is the plan appropriate? and test 3 i.e. Will the plan deliver?</p>  | <p>The policy wording states that proposals in Welsh Language Sensitive Areas <b>outside Centres</b> of the type listed in the policy would be subject to a Welsh Language Impact Assessment. This is not considered ambiguous. It is considered to be an appropriate requirement in terms of the potential for impacts on the Welsh language in these locations.</p> <p>The Authority has no further comment.</p> | Speak                                       |
| 44.    | Litchfields for Bourne Leisure Limited       | MAC29                            | Object         | <p>Bourne Leisure endorses the proposed amendment to Deposit draft Policy 17 Open Space and Green Wedges into two separate policies. This change creates more effective policies and provides greater consistency with national policy.</p> <p>The new supporting paragraph to Policy 17 set out in the Schedule of Matters Arising Changes (MAC) is not justified. The MAC states for paragraph 4.102: "Types of Open Spaces identified include formal and informal recreational</p>   | <p>The policy relates to the need to retain open space for a variety of reasons – including amenity. It does not necessarily mean that the public have to access to the land. Technical Advice Note 16 (Sport, recreation and Open Space) provides a definition of Open Space for use when undertaking an Open Space Assessment. It includes areas of privately owned land with amenity</p>                        | Speak                                       |

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|        |                                |                                  |                | <p><i>open space, church graveyards, amenity space, allotments, planned open space within existing developments and school fields.</i>"</p> <p>This means that open space within private areas of land could be considered to be 'amenity space' despite there not being any public access to the land. This is unreasonable and will introduce inconsistency in how the policy is interpreted and applied.</p> <p>To ensure the application of emerging Policy 17 complies with PPW's second test of soundness ("is the plan appropriate?"), the Plan should make it clear that the types of 'Open Space' identified within paragraph 4.102 applies exclusively to areas of open space that are open for use to the public.</p>   | <p>value. Amenity space is an important element of townscapes, conservation areas and the settings of Listed Buildings and where appropriate has been identified as needing protection.</p> <p>The approach is considered to be appropriate and the Authority has no further comment.</p>          |   |
| 45.    | Litchfields for Bourne Leisure | MAC38                            | Object         | <p>Amongst the removal of other types of development, the Schedule of Matters Arising Changes (MAC) proposed the removal of the following text for draft Policy 21:</p> <p><i>"f) Allow limited expansion of existing caravan and camping sites or the limited development of new sites (Policy 42)."</i></p> <p>It is not clear from the MAC nor Examination Paper HS1/AP6 why the amendments have been made. The Policy seeks to provide direction of the scale of development and sectors of growth for the National Park as part of delivering the overarching strategy of the Plan and the six priority issues. Only three types of development (renewables, shore-based facilities on the coast and waste facilities) are now left within the emerging policy. This is at odds with the preceding paragraphs at Para 4.132 and the importance of setting a strategic growth policy that responds to the objectives of the Plan.</p> <p>The preceding paragraphs at Para 4.132 details the importance of housing growth, employment provision, camping and caravanning and the sympathetic regeneration of Tenby, Saundersfoot, St Davids and Newport. These key growth areas should be reflected within this policy to clearly explain the scale and context for all new development in the National Park Authority and to achieve the emerging LDP's objectives.</p> <p>In response to the 'Deposit Consultation' (June 2018), Bourne Leisure previously endorsed the emerging policy which accepts that the expansion of, or new camping and caravan sites may be appropriate where this is compatible with the National Park designation, under criterion "f" of Policy 21. Within the Deposit Consultation it was clear from criterion "f" that the impact of any given proposed expansion or new development will very much depend on its context, and the scale of such a development that is appropriate will be different in each case.</p> <p>The proposed change fails the second test of soundness ("is the plan appropriate?"). As such, Bourne Leisure considers that criterion f of Policy 21 should be reintroduced, to make the emerging Plan clear and consistent.</p> <p>This comment should be read in conjunction with our comments on MAC5.</p> | <p>These matters were not considered appropriate for inclusion in this Policy as part of the discussion at Examination.</p>  | Speak                                       |
| 46.    | Litchfields for Bourne Leisure | MAC45                            | Object         | <p>Bourne Leisure has no objection to the MAC changes, in principle. However, it is important that the new policy takes account of the fact that, in some cases, development that might affect amenity may be acceptable, where this can be appropriately mitigated and would not result in any unacceptable harmful impacts on amenity.</p> <p>It is, therefore essential that the new policy includes sufficient flexibility to allow for the mitigation of adverse impacts in relation to amenity. This would help ensure that suitable and sustainable development proposals would not be prevented from coming forward where they include appropriate and achievable mitigation measures.</p>   | <p>Effects which can be mitigated satisfactorily would result in a proposal that complies with this policy. It would be usual for all mitigation to be applied when formulating the proposal and prior to a planning application being submitted.</p> <p>The Authority has no further comment.</p> | Speak                                       |

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| 47.    | Litchfields for Bourne Leisure | MAC50                            | Object         | <p>Bourne Leisure disagrees with the proposed amendments to criterion b). Applicants seeking approval for development under this emerging policy would be restricted to seek relocation outside of the Coastal Change Management Area.</p> <p>It is understandable why this might be considered to be the best approach but there are circumstances where development can be relocated while respecting the purpose of the Coastal Change Management Area designation if appropriate mitigation measures are provided.</p> <p>Notably, landowners or businesses are often willing and able to fund sea defence work when relocating which can provide considerable public benefits as well as safeguarding their own assets. The public benefits of sea defence work can assist in securing the long- term future and stability of local businesses who are dependent on coastal locations, therefore, enabling the creation and retention of employment and spending within the local area. Sea and coastal defences can also realign the shoreline which can minimise the extent of intertidal habitat losses and ensure that significant public coastal assets such as the All Wales Coastal path is protected, which is a significant public benefit for human health and well-being.</p> <p>Further, not all development takes the form of permanent buildings. It could be appropriate to allow certain non-permanent forms of development such as caravans in a Coastal Change Management Area in the short to medium term where the objectives are balanced with other priorities in the emerging Plan. The MAC amendments to criterion b) restricts the flexibility and ability of operators to relocate and continue to operate their businesses in and near the Coastal Change Management Area, which could result in an adverse impact upon the local economies of the National Park.</p> <p>As drafted, Bourne Leisure considers that Policy 38 does not comply with PPW's second test of soundness ("is the plan appropriate?"), as it does not provide the flexibility needed to allow operators to relocate or for the NPA to balance competing objectives in the emerging Plan.</p> | <p>Policy 38 relates to proposals for the wholesale relocation of non-residential properties or businesses out of coastal risk areas. The policy is clear that it relates to those businesses that are affected by coastal erosion or tidal inundation within 20 years. The intention of the policy is to reduce risk to life and property in line with national policy. Short-term proposals within the coastal risk areas would be considered against Policy 36 of the Plan which allows proposals for non-residential uses where no increased risk to life or significant increase to risk to property can be demonstrated.</p> <p>Policy 38 is considered to be appropriate and the Authority has no further comment.</p> | Speak                                       |
| 48.    | Litchfields for Bourne Leisure | MAC54                            | Object         | <p>As set out at the Hearing and in its earlier representations Bourne Leisure endorses the overarching strategy set out in draft Policy 42, in allowing additional caravan, camping and chalets where such development is appropriate.</p> <p>One of Bourne Leisure's overriding aims is to improve the quality of visitor accommodation and facilities. For Bourne Leisure to continue to attract customers, the Company must invest to maintain a product that meets customers' expectations. In particular, the Company seeks to ensure that the facilities at all of its sites are good quality and well-maintained, necessitating a programme of replacing older facilities, providing improved pitches for siting caravans and making environmental improvements. This can involve the re-planning of parts of its sites and may require expansion.</p> <p>Bourne Leisure welcomes that the policy responds to the changing patterns of the tourism industry, such as a move from touring to static units and the introduction of new types of accommodation, including "glamping" units. This framework is important in helping to ensure that holiday accommodation providers can maintain an offer that meets customers' expectations.</p> <p>However, it's not clear why there is change to the emerging policy from</p>  | <p>The use of the word 'accommodation' was discussed at the Examination Hearing. The Inspector asked the Authority to explain what the word meant at the hearing and followed this up with an action point to improve the wording of the policy with particular reference to the word 'accommodation'. The reason for the change of wording from 'accommodation' to 'pitch types' is to clarify that the policy applies to a range of camping and caravanning pitches and not just the particular type of units that occupy the pitches.</p>  | Speak                                       |

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|        |                                |                                  |                | <p>'accommodation' to 'pitch types'. The rationale for this has not been explained through the documents available in the Examination Library and it was not discussed at the relevant Hearing Session in July 2019.</p> <p>The use of the word "accommodation" was not the subject of any discussion at the Hearing. We consider that the use of the word "pitches" is potentially confusing or may be limiting the opportunity for operators to provide a wide range of accommodation at existing holiday parks that may be required to respond to guest expectations in the future. The policy should be consistent for both new and existing sites.</p>   |   |   |
| 49.    | Litchfields for Bourne Leisure | MAC55                            | Support        | <p>Bourne Leisure endorses the amendment to the condition to ensure holiday accommodation is used for holiday use and not occupied by the same occupant all-year round. This change responds to the representations that the Company has previously made to the NPA and at the Hearing session.</p> <p>The amendments to the condition support the aim of the emerging LDP to support all-year round tourism, as stated in the draft Vision. The amendment to the paragraph will help in tackling seasonality and maintaining and enhancing the visitor economy within the National Park.</p>   | Noted.  | Speak                                       |
| 50.    | Litchfields for Bourne Leisure | MAC57                            | Support        | <p>Bourne Leisure endorses the changes to paragraph 4.233 of Policy 43, in particular for its flexible approach to considering that 'vicinity' <b>will usually mean</b> up to 1km walking distance from the main entrance to the site (our emphasis). The additional text reflects the need for each proposal to be considered on its own merits on the basis of the size and the nature of the site, its surroundings and the site's demand for facilities.</p> <p>Bourne Leisure as a brand recognises that investment in ancillary retail and other facilities is required to maintain and enhance the viability and attractiveness of their sites (Kiln Park and Lydstep Beach Holiday Park) as destinations. Without such continued investment, there are risks that Bourne Leisure's regional and Welsh roles will be undermined, which in turn would have wider detrimental effects on the local economy (e.g. reduced employment and local spending).</p> | Noted.  | Speak                                       |
| 51.    | 2092 Newport Town Council      | MAC3 & MAC 5                     |                | Late Representations.   | This submission was received late and Officers have not therefore reviewed its content. | N/A   |