

REPORT OF THE HEAD OF PARK DIRECTION

SUBJECT: PEMBROKESHIRE COUNTY COUNCIL'S PREFERRED STRATEGY LOCAL DEVELOPMENT PLAN 2 AND SUPPORTING DOCUMENTS

Purpose of the Report

1. The purpose of this report is to seek formal approval to submit a response on Pembrokeshire County Council's Local Development Plan 2 Preferred Strategy and accompanying documents.

Background

2. Pembrokeshire County Council's current Local Development Plan will expire in 2021. The Council needs to update the Local Development Plan in order to provide for the new growth that will be needed to support communities and business up until 2033 and provide ongoing protection for Pembrokeshire's high quality environment and landscapes. It is also a statutory requirement for the Authority to produce a Local Development Plan and to formally review it. The current timetable anticipates that the Local Development Plan 2 will be adopted following a public examination in 2021. Pembrokeshire County Council's Local Development Plan covers the area of Pembrokeshire outside the National Park.
3. The County Council has engaged with Officers from this Authority in the preparation of the Preferred Strategy. Officers here have also attended workshops with Council Officers to liaise on the development of the Strategy. In addition when preparing for submitting this Authority's own Local Development Plan 2, a Statement of Common Ground has been prepared with Pembrokeshire County Council which provides commentary on areas of compatibility between the Council's Preferred Strategy and this Authority's Deposit Local Development Plan (as prepared for submission).

Response

4. There is a substantive degree of compatibility between the two Plans as advised above and therefore only a limited number of issues are listed for further consideration as set out in Appendix A to this report for your approval.
5. Web links to all the documentation can be found at the end of this report.
6. This Authority was also consulted on the Plan's Equality Impact Assessment and Officers have responded informally on this document.

Risk considerations

7. One of the soundness requirements for Plan preparation (for both Authorities) is ensuring compatibility of their strategies.

Financial considerations

8. The draft comments have been prepared using existing resources. No additional cost to the Authority has been incurred.

Welsh Language considerations

9. It is a matter for Pembrokeshire County Council to ensure that the publication and consultation exercises are carried out in accordance with the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards Regulations (No.1) 2015. The impacts on the Welsh language also forms part of the appraisal process. Any issue for the National Park Authority is picked up in the proposed response attached in Appendix A.

Human Rights considerations

10. The planning system seeks to progress legitimate aims by managing the development and use of land in the public interest to contribute to achieving sustainable development. It reconciles the needs of development and conservation, securing economy, efficiency and amenity in the use of land, and protecting natural resources and the historic environment. Human rights under Articles 1 (right to peaceful enjoyment to property), 8 (right to respect for the home, private and family life) and 14 (right to equality), are the most relevant ones. Proportionality means that the measure which interferes with the right must strike a fair balance between the aim and the right which it interferes with.
11. The process for Local Development Plan preparation and its rigorous assessment procedures will support this approach.

Recommendation: Members are asked to:

- 1. Approve the representation set out in Appendix A on Pembrokeshire County Council's Local Development Plan 2 Preferred Strategy as the Pembrokeshire Coast National Park Authority's consultation response.**

Background documents

Pembrokeshire County Council Preferred Strategy and accompanying documentation www.pembrokeshire.gov.uk/local-development-plan-review.

Statements of Common Ground
<https://www.pembrokeshirecoast.wales/default.asp?PID=876>

(For further information please contact Martina Dunne, Head of Park Direction extension 4820.)

Comments on the Pembrokeshire County Council's Preferred Strategy LDP 2

1. Thank you for the opportunity to submit comments on the above Strategy and associated documents. The Authority appreciates the opportunity afforded through early engagement prior to this formal consultation to provide input and also to agree a Statement of Common Ground regarding the development of our replacement Plans.
2. Going forward the Authority welcomes continued opportunities to engage including on site specific matters that may have implications for this National Park.

Preferred Strategy Text – Commentary

Reference and Comment	Support/Object/Other
A. Spatial Strategy	
<p>It is noted that both authorities continue to take account of the vision and objectives of the Wales Spatial Plan 2008 Update as they relate to Pembrokeshire – The Haven. This spatial approach continues to be reflected in both Plans at the higher levels of the spatial strategy.</p> <p>The Wales Spatial Plan Update 2008 identifies the importance of developing the Area's three strategic Hubs, two of which (the Haven Hub and the Fishguard and Goodwick Hub) are located within Pembrokeshire. The intention is that a significant proportion of residential development will be directed to the Main Towns and the Rural Town during Pembrokeshire County Council's Plan period. In the Deposit Plan, land will be allocated for development for employment and other land uses in most Main Towns, to support their continued role as centres of economic, social and cultural activity.</p> <p>The table below shows the compatibility of approach at higher and lower tiers in both Plans.</p> <p>In terms of additional comment:</p> <p> Service Villages/Rural Centres: Some Rural Centres in the Pembrokeshire Coast National Park are listed in the Service Centres in the Council's Plan: Lamphey and Llangwm. These Centres lie almost wholly</p>	<p>Support - there is (therefore) conformity of approach in relation to the two Plan's spatial strategies and the approach to cross-boundary settlements.</p> <p>Note the approach to infill and rounding off in the National Park Authority's Local Development will be subject to Examination the results of which (through any Matters Arising Changes) will hopefully be available for Pembrokeshire County Council to consider when developing its Deposit Local Development Plan.</p>

Reference and Comment	Support/Object/Other
<p>outside the National Park and the role of the Pembrokeshire Coast National Park Local Development Plan has been to 'complete' inset plan settlement boundary for Centre.</p> <p> Local Villages/Rural Centres: Those local villages that are also listed as Rural Centres in the Pembrokeshire Coast National Park Local Development Plan do not have allocations.</p> <p>Infill and Rounding Off: The Plans each have a nuanced approach developed for such proposals. Both Plans include opportunities for 'infilling' outside Centres. The Pembrokeshire Coast National Park Local Development Plan also refers to rounding off. Both Plans refer to '1 or 2 dwellings'. The County Council's approach is to consider market and affordable housing contributions in groups of 20 dwellings or more (50% affordable housing provision) with just affordable being considered in smaller sized groups. The National Park Authority's definition refers to 'a physical cohesion of dwellings'. The National Park Authority's approach refers to seeking to prioritise affordable housing delivery before market housing is considered in accessible locations (Policy 7a)). Both Plans refer to infilling as a small gap in an otherwise built up frontage. The National Park Authority's Local Development Plan also includes 'rounding off'.</p>	

Policy ¹ Pembrokeshire County Council Pembrokeshire Coast National Park	Haven Towns	North Pembrokeshire Towns	Rural Towns/Tenby	Service Centres/ St David's, Saundersfoot, Newport, Crymmych	Service Villages/ Rural Centres ✘	Local Villages (including Cluster Villages)/ Rural Centres ✘
Housing Allocations	✓	✓	✓	✓	✓	
Housing Allocations	N/A	N/A	✓	✓	✓	
Windfall market housing	✓	✓	✓	✓	✓	✓
Windfall market housing	N/A	N/A	✓	✓	✓	✓
Local need affordable housing	✓	✓	✓	✓	✓	✓
Local need affordable housing	N/A	N/A	✓	✓	✓	✓
Exception sites for affordable housing	✓	✓	✓	✓	✓	✓
Exception sites for affordable housing	N/A	N/A	✓	✓	✓	✓
Employment Allocations	✓	✓	✓	✓	✓	
Employment Allocations	N/A	N/A	✓	✓	✓	
Employment sites through criteria-based policies	✓	✓	✓	✓	✓	✓
Employment sites through criteria-based policies	N/A	N/A	✓	✓	✓	✓
Community facilities – within or well-related to settlements	✓	✓	✓	✓	✓	✓
Community facilities – within or well-related to settlements	N/A	N/A	✓	✓	✓	✓

Reference and Comment	Support/Object/ Other
B. Employment	
<p>The Spatial Strategy commentary above sets out where there is consistency of approach on where employment undertakings can take place in the County.</p> <p>The County Council and the National Park Authority are stakeholders in the preparation of a Regional Strategic Economic study currently being produced with a final report anticipated in 2019.</p>	<p>Support the conformity of approach. The reference in paragraph 6.60 to cross referring to General Policies which include GN.1 criterion 3) dealing with the National Park is supported.</p>

¹ In principal both authorities would support these development types in these locations. However, individual allocations are dependent on whether or not specific sites are available and deliverable and this may not be achievable in some locations.

Reference and Comment	Support/Object/ Other
<p>This study and consideration of Candidate Sites will inform the allocation of strategic sites within the Deposit Plan for Pembrokeshire County Council and which will be identified in the Strategic Employment Policy.</p> <p>Any issues arising for the National Park Authority would need to be considered in a future review of the Plan.</p> <p>Overall, the approach taken by Pembrokeshire County Council is likely to be compatible with the Pembrokeshire Coast National Park spatial strategy.</p>	<p>Note that with regard to Policy SP12 Port and Energy Related Development it is suggested that the reference to excluding wind energy generation would provide clearer advice if inserted in the policy text.</p>
<p>C. Housing Growth</p>	
<p>Pembrokeshire County Council and the Pembrokeshire Coast National Park Authority are in broad agreement on the anticipated scale and distribution of growth.</p> <p>Pembrokeshire County Council and the Pembrokeshire Coast National Park Authority share the view that a higher than Welsh Government projection is deliverable in both planning authority areas (in line with historic build rates). Such an approach will help address affordable housing need and is likely to deliver a more balanced population profile than that projected with lower growth levels.</p>	<p>Support the conformity of approach.</p>
<p>D. Housing Distribution</p>	
<p>Both Plans provide for an emphasis on allocations in the larger centres with a 60/40% split between larger Centres and the Rural Centres/Villages.</p>	<p>Support the conformity of approach.</p>
<p>E. Affordable Housing</p>	
<p>Both plans place a strong emphasis on delivering affordable housing to meet local needs. There is a shared approach to identifying the scale of need using the Local Housing Market Assessment 2014.</p> <p>Both authorities are also party to a joint commission with neighbouring authorities for the preparation of a replacement Housing Market Assessment – due for delivery in 2019.</p> <p>Both Authorities are also part of a joint commission with neighbouring authorities on assessing viability in the region.</p> <p>Both plans aim to address newly arising need and seek to contribute to the historic legacy of need. The authorities liaise directly and through the Pembrokeshire Affordable Housing Group regarding affordable housing delivery.</p>	<p>Support the conformity of approach and continuing to liaise on affordable housing policy and guidance development.</p>

Reference and Comment	Support/Object/ Other
<p>The authorities also intend to prepare a joint affordable housing supplementary planning guidance to replace currently adopted supplementary planning guidance.</p>	
<p>F. Gypsy Travellers and Showpeople</p>	
<p>The Pembrokeshire County Council 2015 Gypsy Traveller Accommodation Need Assessment(2015 GTANA) identifies an unmet need for 32 residential pitches, plus two Travelling Showpeople’s yards, over the next five years (by the end of 2020). Over the Plan period for PCC and PCNPA (up to the end of 2021) this equates to a need for 37 residential pitches and two Travelling Showpeople’s yards. The unmet need over the period up to the end of 2031 for the pending PCNPA and PCC replacement Plans is projected to be 101 pitches, plus the two aforementioned yards.</p> <p>The Council has analysed the responses which identified a need for additional accommodation. To help to plan future provision, this need has been grouped into three geographic areas. These are: Haverfordwest, Pembroke/Pembroke Dock and Kilgetty.</p> <p>No need has been identified in the Pembrokeshire Coast National Park.</p> <p>Pembrokeshire County Council’s Local Development Plan Preferred Strategy recognises that there will be a continued need for Gypsy Traveller pitches.</p> <p>Officers of the National Park have liaised with the Council’s Gypsy & Traveller Accommodation Assessment Steering Group during the revision of the Local Development Plan.</p>	<p>Support the conformity of approach. Await further detail in the Deposit Local Development Plan.</p>
<p>Climate Change</p>	
<p>The Authorities have a shared understanding of the need to plan for climate change and to mitigate its impacts and to provide for high quality design to ensure that new development is sustainable.</p>	<p>Support in principle. Support Policy SP1 Creating Sustainable Places, GN1 General Development, GN2 Sustainable Design and GN4 Resource Efficiency and Low Carbon Energy Proposals.</p>
<p>Visitor Economy</p>	
<p>Both Authorities recognise the importance of the visitor</p>	<p>Support SP15 Visitor</p>

Reference and Comment	Support/Object/ Other
<p>economy to Pembrokeshire's economy and aim to support the visitor economy and to attract visitors all year round. Recognition is given by both Authorities to the attraction of the natural environment and the need for its protection. Between them the Plan strategies will allow for a range of visitor accommodation.</p>	<p>Economy.</p>
<p>Agriculture Rural Diversification/Conversion</p>	
<p>Both plans recognise the importance of agriculture and agricultural support industries to Pembrokeshire and the need to support appropriate rural diversification.</p>	<p>Support SP 10 Countryside criterion 3) diversification and criterion 4) The re-use and conversion of appropriate existing buildings.</p>
<p>Retail</p>	
<p>Both Authorities' strategies focus on the need to maintain / create vibrant and diverse town, district and local centres.</p> <p>Both Plan's retail hierarchies are compatible and based on the findings of the South West Wales Regional Retail Study (February 2017) which was commissioned jointly with Ceredigion County Council.</p>	<p>Support SP 14 Retail Hierarchy</p>
<p>Renewable Energy</p>	
<p>Both Plans seek the delivery of appropriate renewable energy developments, which are considered to be a key area of development for West Wales. This includes recognising opportunities to develop the potential of tidal and wave power and addressing the need for adequate landfall provision for existing and proposed marine renewable projects.</p> <p>Both authorities implement joint guidance on assessing the Cumulative Impact of Wind Turbines.</p> <p>Both authorities carry out joint monitoring of provision annually.</p>	<p>Support GN4 Resource Efficiency and Renewable and Low-carbon Energy proposals.</p> <p>Note It would be beneficial to insert a cross reference GN1 General Development in the reasoned justification.</p>
<p>Environment & Culture</p>	
<p>Both Plans seek to ensure that the county's natural and historic environment and landscape will be protected from inappropriate development and, where possible, enhanced.</p> <p>Both Plans take account of the need to not compromise either individually or cumulatively the qualities of important landscapes including the Pembrokeshire Coast National Park.</p>	<p>Support SP17 Welsh Language, GN1 General Development Policy. Similar approach taken.</p> <p>Note GN1 General Development Policy Criterion 3) refers to both</p>

Reference and Comment	Support/Object/ Other
<p>The Welsh language which continues to be an important component in the social, cultural and economic life of many communities in the County will be protected and supported by managing development sensitively in areas where it has a significant role in the community.</p> <p>Both Authorities are preparing joint Archaeology Lighting and Biodiversity Supplementary Planning Guidance.</p>	<p>impacts on landscape in the County's planning jurisdiction and the National Park.</p> <p>The term 'significantly adversely affect landscape character ...' could usefully be re-considered to ensure the criterion is drafted in a manner appropriate to the significance of the National Park designation (see paragraph 6.36 of Planning Policy Wales 10).</p> <p>A suggested wording that allows a qualitative judgement to be made would advise an 'unacceptable adverse effect', i.e. an unacceptable harmful impact that cannot be satisfactorily mitigated'.</p>
<p>Minerals</p>	
<p>The terrestrial sand and gravel landbank and the apportionment of provision to meet future needs is now considered on a regional basis.</p> <p>There are current sand and gravel production sites in the Pembrokeshire Coast National Park, further sites and allocations in Ceredigion and some small-scale production in Carmarthenshire. However, the regional landbank for sand and gravel is rather limited in comparison with that available for hard rock. National Park sand and gravel production at the two current production sites will eventually cease and production and allocation sites elsewhere in the region are of limited capacity.</p> <p>New terrestrial production sites within the region but outside the National Park are needed.</p> <p>The Plan sets out its approach to meeting that long term need in the emerging Plan: If new sites for sand and gravel production do not emerge in Pembrokeshire</p>	<p>Support the compatibility of approach between the two Plans and with national planning policy.</p>

Reference and Comment	Support/Object/ Other
<p>through submission of suitable Candidate Sites for LDP 2 (or in response to letters sent out with the SWRAWP annual surveys for 2017 and 2018), to provide a basis for making allocations, it may be necessary to continue to use an Area of Search approach for new sand and gravel production sites within the Council's planning area. If this approach is taken, then a criteria-based policy will be included in LDP 2 to provide a basis for the evaluation of any future windfall minerals planning applications.</p>	
<p>Waste</p>	
<p>The two authorities are in agreement on their respective roles on waste planning and management. Each authority develops its own waste planning policies for the respective planning areas, but the County Council has waste management responsibility for the whole County.</p>	<p>Support Policy SP 19 Waste Prevention and Management</p>
<p>Community Facilities and Infrastructure</p>	
<p>Both authorities have adopted joint supplementary planning guidance on Planning Obligations under the current Local Development Plan and intend to prepare joint supplementary planning guidance for the replacement Local Development Plans.</p> <p>Both Plans seek to prioritise affordable housing provision in the case of housing developments where necessary.</p>	<p>Support Policy GN3 Infrastructure and New Development.</p> <p>The National Park Authority would welcome further engagement on the progression of the Community Infrastructure Levy discussion referred to in paragraph 7.23.</p>

Initial Sustainability Appraisal/Strategic Environmental Appraisal

Question 1: Assessment of LDP Vision and Objectives

Do you have any comments on the LDP Vision assessment? Do you have any comments on the compatibility assessment of the LDP Objectives against the Sustainability Appraisal Objectives?

There is likely to be a link between Objective 2 (health and well-being) and "Town Centres are vibrant places where a range of uses take place". Currently the assessment says "no direct link". A vibrant town centre with a range of uses has the potential ensure that communities have access to key facilities and services, which would include health care (see PCC's assessment of this part of the vision against SA Objective 6). It is suggested this be changed to a positive assessment.

SA Objective 7 is also assessed as having no direct link with Vibrant Town Centres. It is suggested that this is also changed to a positive assessment as Town Centres are community hubs that provide excellent places for cultural exchange and use of Welsh language.

<p>Question 2: Assessment of LDP Preferred Option</p> <p>Do you have any comments on the appraisal of the LDP Options and how the Preferred Option was arrived at?</p>
<p>No Comments</p>
<p>Question 3: Assessment of LDP Strategic Policies</p> <p>Do you have any comments on the appraisal of the Strategic Policies?</p>
<p>SP2 – Housing requirement, assessment against SA Objective 10. The impact here is likely to be negative since the development of 6,800 new homes will increase emissions due to energy use, waste and travel. Mitigation measures required by National Policy may allow the reduction of per capita Carbon emissions.</p>
<p>SP2 – Housing requirement, assessment against SA Objective 14. Household and population increase will place increased pressure on inland water bodies for abstraction.</p>
<p>SP2 – Housing requirement, assessment against SA Objective 15. Housing developments should also not increase flood risk according to National Policy, as well as not be built in areas at risk of flooding.</p>
<p>SP 13 - Employment land, assessment against SA Objective 10. Would suggest that any development is going to have a negative impact against this objective both during construction and during operation due to energy use, transportation and waste. The only uncertainty is the scale to which this occurs.</p>
<p>SP 13 - Employment land, assessment against SA Objective 12. See above.</p>
<p>Question 4: Assessment of LDP General Policies</p> <p>Do you have any comments on the appraisal of the General Policies?</p>
<p>GN.1 – General Development Policy, assessment against SA Objective 17. Should the policy make a more direct reference to soils? Protection of soils is implied by “...protects the natural environment” but the protection of other features such as water are mentioned more specifically.</p>
<p>GN.1 – General Development Policy, assessment against SA Objective 20. Policy seems to be lacking any reference to the historic environment in general beyond character. What about archaeology?</p>
<p>GN.3 -Infrastructure and New Development, assessment against SA Objective 9. Does the broad band element of the policy potentially contribute to the object by enabling home working? (reducing the need to travel).</p>
<p>GN.4 Resource Efficiency and Renewable and Low-carbon Energy, assessment against SA Objective 4. This assessment is indicated to contribute to the SA Objective but the commentary says that the policy has no direct relationship. It also includes a paragraph about sustainable transport, which isn't part of this policy or its reasoned justification. Suggest removing the paragraph and changing the assessment to '0'.</p>
<p>GN.4 Resource Efficiency and Renewable and Low-carbon Energy, assessment against SA Objective 11. Some renewable energy projects can have an impact on air quality, specifically wood burning/biomass systems.</p>
<p>Question 5: Other comments</p> <p>Do you have any other comments about the Initial Sustainability Appraisal Report?</p>
<p>Would suggest including full policy text in all assessment matrices so that readers do not need to alternate between the Preferred Strategy and the SA to fully grasp what measures a policy covers, and therefore which SA Objectives are relevant to the assessment.</p>

Comments:

It is suggested that the Preferred Strategy should include specific policy wording in regard to sites and species of European importance. This might be included within SP11, or as additional policy.

Screened-in elements of the Preferred Strategy may then be amended to cross-refer to this policy wording, e.g. 'subject to there being no unacceptable adverse effects on Pembrokeshire's environment (see SP11), including sites and species of European importance (see SP11 (and / or new policy reference))'.

This would complement the approach taken in Pembrokeshire Coast National Park Local Development Plan 2 and enhance the compatibility of the plans.