

Local Development Plan 2 (2017 – 2033)

Public written feedback on Strategic Options Consultation: Draft Issues, Vision and Objectives Informal Consultation

16th July – 10th September 2018

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Abbreviations

JUDP	Joint Unitary Development Plan for Pembrokeshire 2000-2016
LDP / LDP (2)	Local Development Plan / Local Development Plan (2)
LPA	Local Planning Authority
PCC	Pembrokeshire County Council
WG	Welsh Government

Glossary of Terms

Adopted	The Local Development Plan is adopted when the Authority's Council Meeting decides it will be the Development Plan for the County and replace the existing Development Plan.
Affordable Housing	Residential development for sale or rent below market prices and retained as affordable in perpetuity
Affordable Housing Allocation	Land allocated for affordable housing either low cost home ownership or to rent.
Availability and Deliverability of Land	Available land includes a landowner willing to develop or sell for development. Deliverability relates to the economic viability of bringing a site forward
Countryside	Land outside of settlements identified within the Settlement Hierarchy
Deposit Plan	A full draft of the Plan which is available for public consultation during the Deposit Period.
Housing Allocation	Residential development sites for a minimum of 5 units and shown within the Development Plan
Infrastructure	Infrastructure encompasses power supplies, water supply, means of sewage or surface water disposal, roads and other transportation networks, telecommunications and facilities that are required as a framework for development.
Market Housing	Housing for sale at market prices (can include self-build or custom build housing).
Infill and rounding off	This is when housing development takes place in a location where there is no settlement boundary. In such locations new housing may be permitted where it is between existing gaps of properties 'infill' or where it is 'rounding off' an edge of a settlement.
'Planning by Appeal'	Ad hoc development proposals which come forward in the absence of a development strategy to guide development
Preferred Option	The single option or hybrid option resulting from the consideration of a range of options or issues following consultation.

Preferred Strategy	The first formal strategy document for the review of the LDP which sets out the framework and overarching policies that will guide the policies and proposals relating to land use.
Review Report	Sets out what in the LDP needs to change and why.
Settlement Boundary	A settlement boundary is a planning tool which involves a theoretical line drawn on a map to identify the boundary to a settlement. Typically housing development is only permitted within this boundary and areas outside it are considered to be countryside.
Settlement Hierarchy	Settlements are classified within the hierarchy according to the population and level of services within the settlement. Some very small settlements with very limited or no services will fall outside the hierarchy and are defined as countryside.
Self build/custom build housing	Bespoke housing development commissioned and managed by the intended occupier. In all cases whether a home is self-build or custom build, the initial owner of the home will have primary input into its final design and layout.

Introduction

Local Development Plan Review

Pembrokeshire County Council is preparing a replacement Local Development Plan (LDP) – **Local Development Plan 2**. When adopted, it will provide a revised and updated policy framework to guide development outside of the National Park and inform planning decisions taken by the County Council. During the **Review,** the existing Local Development Plan (up to 2021) will remain in place until Local Development Plan 2 (LDP2) is adopted.

Strategic Options Consultation

During the period between 16th July and 10th September 2018, Pembrokeshire County Council ran an informal public consultation on **Strategic Options** for the LDP 2. As part of this consultation, two papers were published, one on **Draft Issues, Vision and Objectives** and one on **Strategic Housing Options.** The second paper **Strategic Housing Options** set out various scenarios for future levels of housing growth and broad locations/policy options to consider for accommodating this growth. Both documents were made available on the Council website and in libraries and contact centres. All of those who had registered an interest in the LDP were informed of the informal consultation. The tables below set out the comments received in response to this informal public consultation and the changes that the Council is proposing to make to the draft Preferred Strategy as a result.

Stakeholder, Member and Town and Community Council Workshops

As well as an informal written consultation, Pembrokeshire County Council also held a number of **engagement workshops** with Stakeholder, Members and Town and Community Councils in July 2018. The focus of these workshops was on the **Strategic Housing Options**. A summary of the feedback received in those workshops is set out in a separate document **"Stakeholder, Member and Town and Community Council Workshop feedback on Strategic Options Consultation"**.

Next steps

The feedback received through the informal written consultation and in the workshops with Stakeholders, Members and Town and Community Councils will be considered and taken forward in the development of the LDP 2 **Preferred Strategy**. Pembrokeshire County Council anticipates publishing its **Preferred Strategy** for formal public consultation in December 2018.

Table 1: Feedback from Informal Written Consultation on Draft Issues, Vision and Objectives

Respondent	Response to Consultation Questions
	Question 1: Do you agree with the Issues identified? **Question 2: Are there any changes that you would propose to the Issues identified?**
Natural Resources Wales [redacted]	Note the issues are identified under the four priorities of the Pembrokeshire Well-Being Plan and welcome this. We agree with the issues identified, in particular 'protecting the environment'.
Nolton and Roch Community Council	Yes – No changes proposed.
Home Builders Federation [redacted]	In terms of housing issues identified under 'Living and working' the HBF note that detail figures for affordable housing requirements are used but are not used for any of the other points relating to housing. The overall message presented by the points is considered confusing as they identify several contradictory issues. The HBF do not consider it necessary to refer to the Wales Spatial Plan as although it has not yet been replaced by the NDF it is clearly out of date and no longer relevant to producing planning policies for the future. At minimum its status should be clarified.
Bourne Leisure [redacted]	Yes. The Issues, Vision and Objectives Paper consultation document identifies the following as a key issue at page 10: *"Tourist accommodation is changing and we need to take this into account including where new sites can be located or extended."* Bourne Leisure welcomes the recognition that the tourist accommodation sector is changing and that this should be taken into account in the emerging Local Development Plan (LDP), including in relation to *"where new sites can be located or extended"*.

	Holidaymakers are increasingly seeking a wider range of accommodation types, and it is important to provide for the diversification of tourist accommodation in order to maintain and contribute to the growth of the tourism industry in Pembrokeshire.
[redacted]	Yes. I think the forward planning team have done a great job in identifying the issues affecting our county, and writing this and the strategic housing options paper in a clear, concise and understandable way. In addition the papers appear to offer real consultation in that they pose real questions about approaches to take and seem to show real interest in our answers. So thank you for that! The only change I would like to suggest is ensuring that walking and cycling routes are protected and enhanced. This may come under the heading of green infrastructure but I am not sure. It would be useful to include a definition of green infrastructure, and green and blue energy in the glossary of terms.
The Coal Authority	As you are aware there is significant coal mining legacy within the Pembrokeshire County Council area which needs consideration when consideration as part of development proposals. The Coal Authority has no specific comments to make in respect of the questions asked in the consultation; however we would expect the downloadable data we provide to the Council in respect of Development Risk and Surface Coal Resource plans to be used to assess any development sites proposed for inclusion in the plan.
Network Rai [redacted]	We agree that appropriate infrastructure provision which includes rail infrastructure is a key issue, as such we are pleased to see this listed at bullet point 12, under the heading 'Living and Working'.

	Any future development policies should ensure that developers engage at an early stage with relevant bodies including Network Rail and that they adequately assess and provide any required improvement to level crossings where development may result in a material increase in pedestrian and/or vehicular use of a level crossing, in consultation with Network Rail. In addition the when the Council undertakes its assessment of potential sites for allocation, the Council should consider any potential adverse impact on the railway within the viability tests it undertakes, as this may impact on the deliverability of a site which adversely impacts the railway infrastructure. Any development which would result in a material increase or significant change in the character of traffic using a rail crossing should be refused unless, in consultation with Network Rail, it can either be demonstrated that the safety will not be compromised, or where safety is compromised serious mitigation measures would be incorporated to prevent any increased safety risk as a requirement of any permission. Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It is therefore appropriate to require developer contributions to fund such improvements. Network Rail owns, operates, maintains and develops the main rail network. This includes the railway tracks, stations, signalling systems, bridges, tunnels, level crossings and viaducts. The

	preparation of development plan policy is important in relation to the protection and enhancement of Network Rail's infrastructure. We trust these comments will be considered in your preparation of the forthcoming Local Development Plan documents.
[redacted]	Yes – no changes proposed.
Theatres Trust [redacted]	Yes, and we consider that a revised approach within tackling rurality might include promoting a more diverse range of town centre uses including cultural facilities.
National Grid	We have no comments to make in response to this consultation.
Dwr Cymru [redacted]	We support the Issues, Vision and Objectives, specifically Draft Objective 2.3 I) which seeks to ensure infrastructure is improved where required in order to ensure that development is directed to sustainable locations. We would however suggest the addition of one further issue to the '*Protecting Our Environment*' topic area: ***"Development will only be acceptable where there is available public sewerage network and wastewater treatment works capacity to ensure no environmental harm"*** We have welcomed the engagement in the LDP2 process to date and have advised of the capacity of our infrastructure in order to assist the LPA to undertake the required assessments; we will continue to update the LPA on infrastructure capacity through the LDP2 process, but feel the additional of this issue will emphasise the need to ensure development is guided towards locations where there is sufficient capacity available.
[redacted]	Broadly agree with majority of issues identified. Would propose removing the key issue under Living and Working viz Settlement boundaries need a common sense approach "

	The statement is a woolly "catch all' that could be utilised to circumvent planning regulations etc and undermine the LDP. It also contradicts Key issues on protecting the Environment particularly Open space and green infrastructure and Countryside protection. Furthermore the statement would appear to insult every past participant in the LDP process and begs the question of whose 'common sense' would be utilised.
[redacted]	Yes agree with issues identified. No changes proposed.
Mathry Community Council	Yes agree with issues identified. No changes proposed.

Conclusions:

There appears to be general support for the Draft Issues identified. Although HBF note that some of these issues are contradictory in nature, this reflects the reality that there are conflicting issues that the Plan is required to address. There is some repetition within the Issues section however, and this will be removed and the overall section simplified. In terms of the Wales Spatial Plan reference, this document is not referred to in the Issues but is identified as an influence on the Vision. **Action: Simplify Issues. Action: The reference to the Wales Spatial Plan will be qualified in the Preferred Strategy. Note HBF's reference to detailed figures on Affordable Housing. Agree to broaden reference here to a high level of need, as a revised LHMA will be produced prior to the Deposit Plan preparation and figures may change.**

Walking and cycling improvements will be considered under the heading 'Green Infrastructure'. **Action: An amendment to the Glossary is proposed to clarify this. Clarification of the terms 'Green and Blue energy' is also proposed.**

Development Risk and Surface Coal Resource plans will be used to assess any development sites proposed for inclusion in the plan – this will take place at a later stage in the Plan preparation process.

Note Dwr Cymru's comments on the protecting environment section. **Action: Under the Protecting our Environment heading a new Issue**: ***"Directing development to locations with an available public sewerage network and wastewater treatment works capacity can help to protect the environment"***. Agree to remove the reference to 'Settlement boundaries need a common sense approach' as this is a policy approach rather than a key issue for the Plan to address.

	Question 3: Do you agree with the Draft Vision for the Replacement LDP 2017 – 2033? **Question 4: Are there any changes that you would like to see in the Draft Vision?**
Natural Resources Wales [redacted]	We agree with the Draft Vision for the Replacement LDP.
Nolton and Roch Community Council	**Yes.** In keeping with the WFGA act and the Act's stress on 'future generations', integral to the success of much of the vision and tackling the issues raised is ensuring that the education system and ALL schools within the county are invested in and looked after. Particularly sixth form education and those primary schools in developing / rural areas outside of the larger towns but still with a healthy catchment or with great potential. The current financial position for Roch school at present requires them to have to merge a range of classes and ages as they do not have the funding for the teachers they need and rely on every penny raised by the PTA. This should not be happening in 2018. Education and our children are the absolute key to the next 50 years and the sustainability and resilience we need. Listening to our young people and investing in their education is a primary focus and should be part of the key issues / vision.
Home Builders Federation [redacted]	The HBF consider the Vision is far too long and overly word, as it goes into far too much detail, however housing issues get very limited mention.
Bourne Leisure [redacted]	Yes. The Draft Vision for the Replacement LDP on page 11 of the consultation document includes the following statement: *"Employment opportunities linked to start-up businesses, tourism, rural diversification, the green and blue energy industry and new sectors linked to the strategic opportunities provided by the Milford Haven Waterway and links to Ireland are promoted."*

	Bourne Leisure endorses the proposed promotion of employment opportunities linked to tourism within the Draft Vision for the emerging Replacement LDP. Planning Policy Wales (PPW) (edition 9) notes at paragraph 11.1.1 that tourism is vital to economic prosperity and job creation in many parts of Wales. This is certainly the case in Pembrokeshire, as recognised at paragraph 3.16 in the adopted LDP, which states that the tourist industry is the largest industry and employer in the county. Bourne Leisure therefore considers that it is important for the Draft Vision for the Replacement LDP to provide support for employment opportunities linked both directly and indirectly to tourism.
[redacted]	Yes, as long as green infrastructure includes walking and cycling routes. I am particularly pleased to see vibrant town centres and place-making in the vision. No, as long as green infrastructure includes walking and cycling routes.
[redacted]	Generally yes – no changes proposed.
PCNPA [redacted]	It would be helpful if the Vision provided some spatial expression of where development is focused. This is understandably not possible at the moment. References to matters such as 'green and blue energy' will need an explanation – glossary of terms. Suggest including a statement regarding 'climate change' and the 'landscape'.
[redacted]	Yes Would like to see more reference to our unique county landscape and our duty to preserve it.

[redacted]	Draft Vision. The Draft Vision is too long. Element 1 could read as "*In 2033 Pembrokeshire is a place with strong resourceful communities*". Adding "*Where challenges of rurality are successfully tackled*" is unnecessary as it weakens an overall vision and divides rural and urban areas where there are different and probably equal problems. "*Rural communities are supported to deal with changing agricultural practices*". There are other major problems in rural communities centred on declining service provision by both central and local government and by private sector firms, reduction in public transport, aging population with a reducing ability to drive own vehicles and the rise of second homes. There is talk of a Loneliness Czar and of concerns re Well-Being both which will be more relevant in rural communities with an aging population and where services are being withdrawn etc. I would also suggest that changing agricultural practices have been a characteristic of rural areas for the last 30 years at least and largely completed at least in respect of a reduction in employment levels, and therefore no longer remains as the principal driver of change.
[redacted]	Agree with Draft Vision – no changes proposed.
Mathry Community Council	Agree with Draft Vision – no changes proposed.
Conclusions: **Action: Introduce reference to landscape and climate change. Action: Introduce reference to infrastructure to support development. Action: Consider introduce additional detail on locations at Deposit Stage, post Preferred Strategy consultation.**	
	Question 5: Do you agree with the Draft Objectives for the Replacement LDP 2017-2033?

	Question 6: Are there any changes that you would like to see to the Draft Objectives?
Natural Resources Wales [redacted]	The Objectives do not adequately ensure the protection and/or enhancement of biodiversity, in terms of species and their habitats and therefore does not reflect the Vison which states "Green infrastructure and biodiversity are enhanced". We agree that there should be an objective for green infrastructure however it does not address the above. Also, Objective J states "protect the County's landscape and environment, it is too vague. We suggest instead of including the environment with landscape, there should be an objective which encompasses the environment, biodiversity, species and their habitats.
Nolton and Roch Community Council	Yes - An objective to ensure education is invested in and made an absolute priority and also an objective to more pointedly improve access to services and the infrastructure for rural Pembrokeshire, including broadband technology.
Home Builders Federation [redacted]	The HBF would question the wording used in Objective D where its states 'Sustain resourceful communities' this either needs to be explained or replaced by alternative more commonly used wording.
Bourne Leisure [redacted]	Yes. The Issues, Vision and Objectives Paper consultation document includes the following draft objective at page 13: *"C) Sustain and enhance the rural and urban economy by supporting start-up businesses, rural diversification, changing agricultural practices, the visitor economy, and the expansion of Small and Medium Enterprises."* Bourne Leisure endorses Draft Objective C, which seeks to sustain and enhance the rural and urban economy by, inter alia, supporting the visitor economy.

	Planning Policy Wales (PPW) (edition 9) notes at paragraph 11.1.1 that tourism is vital to economic prosperity and job creation in many parts of Wales. It also states at paragraph 11.1.7 that, in rural areas, tourism-related development is *"an essential element in providing for a healthy, diverse, local and national economy"*. This is certainly the case in Pembrokeshire, as recognised at paragraph 3.16 in the adopted LDP, which states that the tourist industry is the largest industry and employer in the county. Bourne Leisure therefore considers that it is important for the Draft Objectives for the Replacement LDP to provide support for employment opportunities linked directly and indirectly to tourism. Draft Objective C also appropriately reflects the Draft Vision, which includes the proposed promotion of employment opportunities linked to tourism.
[redacted]	Yes, as long as green infrastructure includes walking and cycling routes. I am particularly pleased to see town centre regeneration, place-making, and supporting start-ups and SMEs in the objectives. No, as long as green infrastructure includes walking and cycling routes.
[redacted]	Generally yes. No changes proposed.
Theatres Trust [redacted]	Yes – in particular the promotion of a range of uses within town centres.
PCNPA [redacted]	- Objective B) The matters to be taken into account to achieve sustainable design seem limited to just historical heritage matters. It may be helpful to consider matters such as landscape, townscape etc. - Objective D) The term 'resourceful' might imply that there are communities in the County that are not resourceful? This

	objective will need re-visiting when an agreed approach to housing is finalised. - Objective E – Ports are evolving – the petrochemical industry will not continue forever. - Is a reference to sustaining community facilities needed?
[redacted]	Would wish to see 2.3 D) Expanded to acknowledge the clear emphasis on affordable housing and housing for the elderly. If I) is left in then the term 'sustainable' needs to be defined in the Glossary or this is a call for Urbanisation. Would suggest deleting 'directing development'.
[redacted]	Agree with Draft Objectives. No changes proposed.
Mathry Community Council	Agree with Draft Objectives. No changes proposed.

Conclusions:

Amend Objective J, to reflect NRW comment on separating landscape from environment and elaborating on the reference to the environment to include biodiversity and habitats. Note the comments regarding the need to support education, but consider that this is picked up by the reference in Objective I to facilitating improvements to infrastructure. Green infrastructure definition will clarify that this includes cycling and walking routes. Amend Objective B to reflect National Park comments on landscape and townscape. Amend Objective D to reflect both HBF and National Park comments, clarifying the importance of community facilities as a means of ensuring that Communities can be resourceful. Retain Objective E as reference already includes green energy, reflecting likely increasing development in this direction. D – a range and mix of homes includes affordable homes and those for the elderly. Specific reference to these will be made in the Policies of the Plan. I – directing development to sustainable locations – this includes for example directing development away from flood risk areas. Further clarification will be included in the Plan.