



# Stakeholder Consultation

8<sup>th</sup> December 2008

## **Introduction**

As part of the ongoing process of producing Pembrokeshire's Local Development Plan (LDP), stakeholders were invited to attend a consultation event in Haverfordwest.

A workshop took place on Monday 8<sup>th</sup> December, from 10.30 till 3.30pm, in the Committee Rooms at County Hall.

In total, 36 stakeholders took part in the event, from a wide range of planning related backgrounds.

## **Aim of the Workshop**

The preparation of a Preferred Strategy for the Council's LDP is a key part of the LDP process. With this in mind, stakeholders representing a range of interests and viewpoints were invited to the workshop and asked to consider a vision statement, draft objectives, draft strategic policies, growth options and spatial options for the new plan. This has helped the Council to understand the views and issues that key stakeholders would want the LDP to address and provided an indication of which options might be favoured.

The workshop involved a series of questions, discussions and presentations.

Stakeholders were divided into four groups for the day. Each group was led by an independent facilitator, a note taker, plus a representative from the Planning service (whose role was to clarify issues during the discussion).

The outline of the day was as follows:-

### **Session One**

The Vision  
The Objectives

### **Session Two**

Sustainability in LDPs (presentation only)  
Strategic Policies

### **Session Three**

Level of Growth Options  
Spatial Options

This report includes the notes from all four groups.

Feedback forms were available to participants, should they wish to make additional comments following the event. Comments have since been received and are included at the end of this report.

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## **Key Outcomes from the Workshop**

### **Group 1**

The general view was that the Low Growth Option was not desirable – there was particular concern that this option would be unable to provide enough affordable housing.

The group view was split between the Medium and High Growth options with some group members arguing that High Growth was important as a means to tackle the Affordable Housing backlog and others suggesting that High Growth would not be deliverable and would be likely to cause environmental damage. A view was also expressed that phasing was important, especially in rural areas.

On the Spatial Options no clear choice emerged, but it was suggested that the following views should be reflected in a hybrid:

- The group wanted to support rural communities but thought that 50% of housing growth in rural areas was too high (with particular concern regarding possible environmental damage);
- The group felt that a strong urban emphasis would not support rural communities;
- The group wanted some infill opportunities / rounding off in very small rural villages, but not large allocations;
- The group suggested that if a hierarchy of settlements was to be used it would need broadening;
- The group didn't think that the sustainable communities concept would work in the South, but suggested it might do so in the North; and
- The group thought that allowing criteria based policies linked to employment was important, if favouring locations adjacent to settlements.

Summary for Level of Growth: Medium / High with phasing.

Summary of Spatial Options: Elements of 2 and 3.

## **Group 2**

The group favoured the High Growth option, but had some concerns regarding the environment and deliverability. The majority still wanted High Growth in spite of these concerns, but suggested that phasing might address some of the concerns.

There was a split of views on the Spatial Option, but the majority favoured Spatial Option 3 because they wanted to support rural communities and to avoid an over-emphasis on urban areas.

## **Group 3**

The Low to Medium growth options were favoured by this group, with group members fairly evenly split between the two. Some members argued for very low growth.

The group favoured Spatial Option 2. A number of the group members were familiar with the Wales Spatial Plan and wanted to incorporate this into the option more strongly, but there was no overall consensus on this.

## **Group 4**

This group favoured a Medium to High Growth Option, with strong phasing, so that a high level of growth could take place if the economy improves and to prevent cherry picking of sites by developers. If the economy does not improve then the group felt that the plan should allow for a medium growth level only.

There was consensus in the group that Spatial Option 3 should be chosen, as group members wanted to support rural areas and direct 50% of new growth to these areas to help sustain existing facilities, services and hence communities. However, the group did not want large-scale development in rural areas without the facilities to support it.

## **Summary:**

- There was widespread (but not universal) support for Medium to High Growth, subject to strong phasing to prevent cherry-picking of sites. However there were concerns over deliverability (e.g. a high overall housing figure might commit the Council to unachievable targets for market and affordable housing) and possible environmental damage.
- A 50% urban 50% rural split was broadly (but again not universally) supported but with development directed to settlements with services rather than distributed using a Sustainable Communities approach (although the latter didn't attract comment).
- Spatial Option 2, based on the Wales Spatial Plan hub concept and a settlement hierarchy received support, but there was no comment forthcoming on the possibility of distinctive / different approaches in the North and South East of the County.

## **Conclusion:**

### **Use a Hybrid Option**

#### **Elements would include:**

A framework based on Spatial Option 2 – Wales Spatial Plan (drawing on the idea of Main Towns as Hubs, Service Centres and other Settlements with Services). However, there would be one policy approach throughout the County, i.e. no distinction between the North, the South East and the Haven areas.

A 50% Urban / 50% Rural split, but with a settlement hierarchy based on the Rural Facilities Survey results rather than a sustainable communities approach.

A Medium to High Level of Growth coupled with strong phasing.

Employment allocations and also criteria based employment policies allowing development to be distributed to rural and urban areas.

Retail policies focusing on the regeneration of town centres, supporting services in rural areas and building on the idea of complementarity put forward in the Wales Spatial Plan.

#### **The Next Stage in the Process**

The outcomes from this workshop will be taken into consideration in preparing the Preferred Strategy for the LDP. In some cases a consensus view or strong majority view was forthcoming, but in other instances there was more diversity of views. It will therefore not always been possible to reflect the view of an individual stakeholder in preparing the LDP Preferred Strategy document. In some cases the outcome from the stakeholder workshop has suggested to us that a hybrid option might be the best way forward, reflecting elements of what different stakeholders proposed. Public consultation on the LDP Preferred Strategy will provide a further opportunity for stakeholders to comment on issues of particular concern or to indicate support for the plan strategy.

## GROUP 1

**Facilitators:- Sarah Worby, Charlotte Harding**  
**Planning Representative:- Sara Hill**

### ***Stakeholders attending:***

*Cllr Alan Vaughan, One Voice Wales*  
*Mr John Turbervill, PCC*  
*Mr Charles Hill, Dyfed Archaeological Trust*  
*Mr Paul Evans, Hywel Dda NHS Trust*  
*Mr Graham Holmes, Pembrokeshire Housing*  
*Mr Guy Thomas, Guy Thomas & Co*  
*Mr Mark Newey, WAG*  
*Mr Ryan Bowen, Welsh Water*  
*Mr Paul Morgan, PCC*

### **Session One** **THE VISION**

*“In 2021 Pembrokeshire will continue to be an attractive place in which to live and visit. There will be strong, sustainable communities supported by robust, diverse, prosperous economy. These will be based on the area’s unique environment, cultural identity, maritime access and internationally important energy and tourism opportunities.”*

The group was asked the following questions when considering the Vision:

1. Is the Vision distinct and relevant to Pembrokeshire?
2. Is it clear what sort of place Pembrokeshire should become?
3. Is the Vision balanced between economic, social and environmental aims?

In considering the questions, the following comments were made:

- Several members of the group felt that the Vision statement wasn’t very memorable but after some discussion most of the group agreed that the Vision did need to be broad and all encompassing
- The group agreed that the Vision needed to reflect local aspirations and emphasise the potentially important economic role the County could play, with its unique position in terms of maritime access, proximity to Ireland and tourism offer
- Members of the group agreed that the statement could be more distinctive. One member commented that if you removed the word ‘Pembrokeshire’ it might relate to any one of a number of places in Wales. Several members of the group

suggested that it needed to incorporate actual specific references to local features and places.

- One member of the group felt that the word 'continue' was inappropriate, as Pembrokeshire was not yet at the stage suggested in the opening sentence and there were still many areas in need of improvement. Other members of the group gave a number of examples of areas they felt needed to be improved and it was agreed that the suggested statement didn't convey enough of a sense of the need for improvement, such as development of the road network and addressing affordable housing needs.
- One member of the group felt there should be more emphasis on strengthening the local economy and not just on external investment.
- One member of the group commented that it was inappropriate to use the word 'diverse' in relation to Pembrokeshire's economy, as it would never be truly diverse but would inevitably remain reliant on a limited number of sectors.
- One member of the group felt that 'attractive place to live and visit' should be reworded to read 'attractive place in which to build a life-long career and visit'.
- One member of the group felt there was insufficient emphasis on Pembrokeshire's potential as an area in which alternative sources of energy might be developed.
- One member of the group questioned whether there was sufficient emphasis on sustainable development and whether the reference to 'sustainable communities' was sufficient.
- One member of the group suggested that there needed to be more emphasis on tourism.

## **THE OBJECTIVES**

The group was asked to consider all 24 objectives within the draft plan. They were asked to place each objective under one of the following headings:

- *Would help achieve the vision*
- *Not sure/maybe*
- *Would not help achieve the vision*

After some initial discuss, the group agreed that all the objectives would, in some way, contribute towards achieving the vision. A swift secret ballot was undertaken, in which members of the group indicated their top six individual objectives. A total of 49 votes were recorded. One member of the group abstained.

In addition, the following comments were made on the objectives.

#### General comments

It was agreed that there was an opportunity to merge a number of the objectives. It was suggested, for example, that there might be a general 'infrastructure' objective.

It was agreed that while some of the suggested objectives were laudable they would be difficult, if not impossible, to measure and might, therefore, better be included as themes or policies within the documents.

#### A. To provide land for community facilities and services (2/49)

- The group agreed that this was the fundamental purpose of the Local Development Plan.

#### B. To meet the housing needs arising within the County Council's planning area (6/49, highest ranked)

- One member of the group felt, quite strongly, that this didn't address the question of the inter-relationship with housing needs in the Pembrokeshire Coast National Park Authority area, and gave Tenby as an example of a town where he felt this was of particular relevance.
- There was general agreement that the wording of this objective didn't address the need to ensure that housing was of sufficient quality and appropriate to the location in which it was built. The issue of appropriate density of housing was also raised.

#### C. To support Pembrokeshire's cultural and linguistic heritage (1/49)

- One member of the group suggested that a definition of cultural and linguistic heritage needed to be provided to validate this objective.

#### D. To locate Housing where infrastructure is available and in sustainable locations (4/49, joint fourth highest)

- The majority of the group agreed that this objective should be wider, provide greater acknowledgement of the limitations that may be imposed by infrastructure and acknowledge that it might not be possible for all development to be in 'sustainable locations'. It was suggested it might be re-worded to read: 'To locate development where infrastructure is available and where it can be provided and in (predominantly??) sustainable locations'.



E. To improve strategic accessibility to and from ports and main towns of Pembrokeshire (2/49)

- One member of the group said that this should acknowledge the possibility that access could be improved 'by sustainable means' and not simply by improvements to the road network.

F. To improve infrastructure at the Pembrokeshire ports and provision of associated facilities including employment sites at gateway sites (2/49)

- Several members of the group agreed that it might be advisable to have a general infrastructure objective.

G. To improve local accessibility particularly within and between the main towns of the plan area (2/49)

H. To improve access to quality, high speed broadband technology and to other communications infrastructure (2/49)

- The group agreed that this was something outside the control of those delivering the Local Development Plan and suggested that the objective be reworded as follows: 'To allow for improved access to quality, high speed broadband technology and to other communications infrastructure'.

I. To develop a robust, diverse, competitive and sustainable local economy, including the marine and energy sectors (5/49, second highest ranked)

J. To support development of the Pembrokeshire ports (0/49)

K. To support sustainable rural development and agricultural diversification initiatives (2/49)

- One member of the group felt that there might be some potential tensions with objective D if development was restricted to 'sustainable locations'.

L. To develop a year round sustainable tourism offer based on quality visitor accommodation and a variety of diverse attractions (3/49)

- One member of the group suggested that this could be linked with objective C, as cultural and linguistic heritage was an important part of the tourism offer

M. To support the regeneration and enhancement of Pembrokeshire's town centres, building on their distinctive but complementary roles and where necessary tackling the qualitative issue in terms of retail provision (3/49)

N. To provide opportunities for lifelong learning, through the provision of training and educational facilities to create a multi-skilled and adaptable workforce (2/49)

O. To provide appropriate health care facilities (4/49, joint fourth highest)

- One member of the group commented that there was still nervousness around the issue of merging/relocating district general hospitals

P. To provide appropriate recreational open space facilities (2/49)

Q. To use resources effectively (0/49)

- The group discussed whether this would be better placed as a theme or policy underlying the strategy rather than an actual objective, as it might prove very resource intensive to measure

R. To manage waste efficiently and sustainably (1/49)

S. To protect and enhance the landscape and countryside (1/49)

T. To safeguard archaeological, built and natural heritage (including mineral reserves) (2/49)

- One member of the group said he felt that mineral reserves should be a separate objective, with which there was general agreement

U. To enhance the built environment, ensuring high quality sustainable design and local distinctiveness (1/49)

V. To reduce, and adapt to, the effects of climate change (2/49)

- It was agreed that although this was important it would be extremely difficult to measure and perhaps should not, therefore, be included in the document as an objective.

W. To protect and enhance biodiversity.(0/49)

X. To develop Brownfield sites in preference to Greenfield sites where appropriate.

## **Session Two**

### **STRATEGIC POLICIES**

**The group was asked to consider strategic policies 1 – 6 but members of the group also made comments on Policies 7 and 10 (see below).**

The group was asked the following questions:

1. Are the policies clear?
2. Will they deliver the aims of the LDP Vision and Objectives?
3. Are there any Strategic Policies that could be left out?
4. Is there anything missing?

#### General comments

- Several members of the group felt that there needed to be a glossary of terms/definitions of a number of the things made reference to in the Strategic Policies
- It was felt that Policy 1 was all embracing and, perhaps, in contrast to the more specific policies that followed. It was asked whether it would be better as an overarching aim rather than a policy.
- There was general concern about how Policy 1 would be measured and monitored. One member of the group felt, quite strongly, that it would be very challenging for some developments to deliver this and that large scale increases in the amount of paperwork surrounding applications would not be constructive or welcome.
- Similarly, it was felt that there needed to be greater clarity around Policy 2. Several members of the group said that the ‘needs’ identified in Policy 2 needed to be much more clearly defined.
- One member of the group asked, for example, whether ‘holiday/second homes’ were taken into account when assessing ‘need’. [Planning Officer response – not anticipated that growth would have marked impact, demand for holiday/second homes had remained stable for quite some time. Majority located within PCNPA planning area.]
- The group agreed that the points that had been raised in relation to the housing need objective (i.e. quality, appropriateness, density) were also relevant to Strategic Policy 2.
- One member of the group said that it was important to include a reference to the accommodation needs of Gypsies and Travellers (Policy 3).

- Several members of the group agreed that there should be greater reference to integrated transport. If this wasn't referenced in the Regional Transport Plan for South Wales (Policy 5) then this should be added into Policies 5 and 6.
- One member of the group also suggested that Policy 5 should include a reference to air travel and the potential development of this form of transport.
- It was generally agreed that it should be clearer where, and what links, there were between the Strategic Policies and national policies.
- As with the objectives, it was suggested that, perhaps, there should be a single infrastructure Policy.
- One member of the group felt that the priority should be placed on the provision of local services and access to these, rather than suggesting the acceptability of travelling to services further a field.
- One member of the group commented that the wording of Policy 7 perhaps suggested that any non-nuclear energy development would be appropriate and acceptable. It was agreed that this probably needed to be re-worded.
- One member of the group questioned what was meant by 'built environment' (Policy 10) and said that this needed to be defined.

### **Session Three**

#### **LEVEL OF GROWTH OPTIONS**

##### **Following a short presentation, the group was asked:**

What is your preferred level of growth option?  
Why?

- With the exception of one member, the group was unwilling to answer these questions directly.
- It was agreed, however, that given the objectives the group had indicated were priorities, the low growth option would be out of step with achieving these.
- One member of the group felt, quite strongly, that the high growth option would 'ruin' Pembrokeshire, paving the way for volume builders to construct high density, poor quality housing.
- There were general concerns that while the high growth option would, perhaps, best meet local economic development aspirations and address affordable housing needs that it was unrealistic and unachievable because of constraints on local infrastructure - particularly the development of the infrastructure for water.

- Several members of the group thought that some sort of control of the phasing of development would be constructive. One member thought it would be helpful in terms of tying in with cycles of development for water infrastructure and another in off-setting the potentially harmful impacts of higher growth options, especially in rural areas.

#### **Session Four SPATIAL OPTIONS**

##### **Following a short presentation, the group was asked:**

What is your preferred spatial option?

Why?

- The group seemed very unsure about expressing preferences for either one of the spatial options presented and uncomfortable in discussing them. One member of the group cautioned that inspectors would be looking for a coherent plan which presented a logical argument, underpinned by clear evidence.
- There was a general conclusion that the Option 3 was not balanced and that while rural communities needed support, that 50% of development in rural areas was too high and result in damaging the character of rural areas. However, one member of the group asked whether this approach might not be more appropriate in the north of the county, with perhaps a different approach being adopted in the south.
- There was some feeling that factors limiting the development of infrastructure might constrain development in a way described in Option 1. Flooding and drainage were mentioned as factors that might limit development.

However, the group seemed uncomfortable with the idea of development being completely limited to urban centres and primary villages, and seemed to find this idea rather 'restrictive'. Several members of the group felt that Option 1 would drive young people away from villages in which they'd been brought up and prohibit them from living close to family members.

- One member of the group said that there should be an allowance for in-fill and rounding off in rural villages, whichever Option was decided upon.
- One member of the group felt that the issue of developing sites for employment/agricultural diversification in rural areas, and the location of these, needed to be addressed through the development of more detailed guidance.
- There was general agreement that the regeneration of Town Centres was important but the group were unwilling to engage in discussion on the independent/networked models presented in Option 2 and Option 3.

## **GROUP 2**

**Facilitators:- Sara Jenkins, Charlotte White**  
**Planning Representative:- Bob Smith**

### **Stakeholders attending:**

Mr. Kieran Sommers, RWE NPower  
Mr. Kefin Wakefield, PCC (Economic Development)  
Mr. David Watkins, Environment Agency  
Mr Alan Hunt, PCC (Access Officer)  
Mr. Adrian James, CCW  
Ms Perkins, Edward H Perkins  
Mr. Matthew Owens, Housing Association  
Mr. Stephen Bengner, PCC (Highways)  
Cllr Owen James, PCC

### **Session 1** **THE VISION**

*“In 2021 Pembrokeshire will continue to be an attractive place in which to live and visit. There will be strong, sustainable communities supported by a robust, diverse, prosperous economy. These will be based on the area’s unique environment, cultural identity, maritime access and internationally important energy and tourism opportunities.”*

The group was asked the following questions when considering the vision:

1. Is the Vision distinct and relevant to Pembrokeshire?
2. Is it clear what sort of place Pembrokeshire should become?
3. Is the Vision balanced between economic, social and environmental aims?

In considering the questions, the following comments were made:

- The vision has captured most of the key sectors relevant to Pembrokeshire.
- Agriculture should be addressed within the vision. Agriculture is small in economic terms but important to local people, however planning only has some influence on agriculture and this is limited.
- The vision needs to be realistic and sound.

- Innovation is important as Pembrokeshire cannot rely on a market level approach. Pembrokeshire is somewhat removed from markets.
- The vision needs a strong, rural base. The vision does not reflect the rural characteristics of the County. This is important for Pembrokeshire as there are important rural issues that need to be addressed.
- “Attractive” – Seems to do a disservice to the County. The word makes the first sentence a lot weaker than the second sentence. Possibly omit the word “attractive” and replace it with a stronger word to match the second sentence. “Attracting” would be more appropriate than “attractive”. Using the word attracting would imply attracting young people back to the county and visitors to visit. Attractive is possibly not strong enough.
- The second sentence is a lot stronger – contains stronger adjectives such as “robust, diverse, strong”.
- “Supported by” should possibly be replaced by “based on” and therefore represent the idea that the first half of the vision is supported by the second part.
- The vision needs to represent Pembrokeshire’s uniqueness.
- The proximity and relationship of the National Park with the wider area of Pembrokeshire is important. Does the Vision need to make reference to this relationship? The County Council and National Park LDPs should demonstrate a relationship.
- The vision has a weaker environmental and cultural element – the emphasis is economic.
- The vision needs to address the issue of the ageing population in Pembrokeshire.
- The County could positively benefit from the retention of the younger population in rural communities.
- The word “dynamic” would be more attractive to the younger generation.
- The first sentence could include the word “work” in addition to “live” and “visit”.
- “Quality” should be included in the vision.
- The vision should not ignore particular groups. The vision should be an inclusive statement. Maybe include the word “inclusive” in the vision.

- Need greater diversity and less exposure to risk in Pembrokeshire. Planning should encourage diversity.
- A diverse economy is important.
- Sustainable is an important word, it has economic, social, and environmental implications. The word brings everything together and determines a focus. The word “sustainable” should be included in the first sentence to emphasise the importance. Sustainability should also include agriculture.

## THE OBJECTIVES

The group was asked to consider all 24 objectives within the draft plan. They were asked to place each objective under one of the following headings:

*Would help achieve the vision*

*Not sure/maybe*

*Would not help achieve the vision*

### **Would help achieve the vision**

All of the following objectives were placed in the “Would help achieve the Vision column”.

It was the opinion of the group that some objectives may need rewording. Notes are included in blue to explain the groups reasoning. Objectives that would help achieve the vision but may need rewording are detailed below:

**Objective F** “To improve infrastructure at the Pembrokeshire ports and provision of associated facilities including employment sites at gateway sites

**Objective J** “To support the development of the Pembrokeshire ports

It was the general consensus that these two objectives could be incorporated into one objective.

**Objective K** “To support sustainable rural development and agricultural diversification initiatives”

Comments were made that the objective should mention agricultural development and not merely rural development. Many thought that the phrase agricultural diversification was ambiguous and suggested a move away from agricultural development which would be detrimental for Pembrokeshire.



**Objective L** “To develop a year round sustainable tourism offer based on quality visitor accommodation and a variety of diverse attractions”

Comments were made as to whether the word “offer” is necessary and the possibility of replacing “diverse” with “quality”.

**Objective M** “To support the regeneration and enhancement of Pembrokeshire’s town centres, building on their distinctive but complementary roles and where necessary tackling the qualitative issue in terms of retail provision”

The group was unsure about this objective as they felt it was slightly ambiguous. Group members felt that town centres were hugely important but that this objective was unclear. The phrase “qualitative issue” was not understood entirely by group members.

**Objective O** “To provide appropriate healthcare facilities”

**Objective P** “To provide appropriate recreational and open space facilities”

**Objective A** “To provide land for community facilities and services”

The group was unsure about the consistency of use of the word “appropriate” across all objectives. It was also suggested that the word accessible be used instead of appropriate in the case of Objective P. It was also stated that Objective’s O and P could be incorporated into Objective A without the need for separate objectives.

**Objective Q** “To use resources efficiently”

The group felt that this objective was far too simplistic. They also questioned the inclusion of an objective regarding minerals and Greenfield/Brownfield sites at this point in the document.

**Objective T** “To safeguard archaeological, built and natural heritage (including mineral reserves”

The group suggested that minerals should have a separate objective and that the word “enhance” needed to be included somewhere in this objective.

**Objective U** “To enhance the built environment, ensuring high quality sustainable design and local distinctiveness”

The group commented that the word “inclusive” should be included somewhere in this objective in terms of design and the mention of historic buildings is necessary. High quality design in terms of new build was emphasised as a priority. The objective does not make reference to innovative design nor removal of dereliction.

Other objectives that would help to meet the vision are detailed below with any additional group comments included in blue:

**Objective B** To meet the housing needs arising within the County Council's planning area.

**Objective C** To support Pembrokeshire's cultural and linguistic heritage.

**Objective E** To improve strategic accessibility to and from the ports and main towns of Pembrokeshire.

People's enjoyment of how they get to somewhere is very important according to Group Two and therefore transport is an important issue.

**Objective G** To improve local accessibility particularly within and between the main towns of the plan area.

**Objective H** To improve access to quality, high speed broadband technology and to other communications infrastructure.

There was strong support for objectives G and H. On objective G, the group wished to see more free parking spaces dedicated to those sharing cars.

**Objective I** To develop a robust, diverse, competitive and sustainable local economy including the marine and energy sectors.

**Objective L** To develop a year round sustainable tourism offer based on quality visitor accommodation and a variety of diverse attractions.

**Objective N** To provide opportunities for lifelong learning, through the provision of training and educational facilities to create a multi-skilled and adaptable workforce.

The wider picture needs to be considered in the case of education as there is only so much planning can do to influence this.

**Objective P** To provide appropriate recreational open space facilities.

**Objective R** To manage Waste efficiently and sustainably.

**Objective S** To protect and enhance the landscape and countryside.

Is water quality included in our remit?

**Objective V** To reduce, and adapt to, the effects of Climate Change.

**Objective W** To protect and enhance biodiversity.

**Objective X** To develop Brownfield sites in preference to Greenfield sites where appropriate.

**Would not help achieve the vision**

Group Two did not think that any of the objectives would NOT help to achieve the vision and therefore this column was left blank.

**Not sure/Maybe**

Objective D “To locate housing where infrastructure is available and in sustainable locations” was placed in the Not sure/Maybe column as this received a mixed response by the group. It is important to note, however, that a member of group two chose to place one of their red dots against this objective thus highlighting its importance to that individual.

General comments about the Objectives:

Amendment is needed to reference the need for adaptation to the changes taking place in society in general. The LDP needs to help face these new challenges.

Innovation is important.

The environmental objectives aren't consistent. The need for more frequent and better use of the words “safeguard” and “enhance”.

Following the discussion on the objectives, group members were given three red dots each and asked to place them alongside the objectives that they felt were most important in helping to achieve the vision. The results are recorded in the table below.

<b>Objective</b>	<b>No. of red dots</b>
A	1
B	5
C	0
D	1
E	2
F	0
G	1
H	0
I	4
J	0
K	5
L	1
M	1
N	0

O	0
P	0
Q	0
R	0
S	2
T	0
U	1
V	0
W	0
X	0

## **Session 2**

### **STRATEGIC POLICIES**

The group considered strategic policies 7-12 and were asked the following questions.

- 1. Are the policies clear?**
- 2. Will they deliver the aims of the LDP Vision and Objectives?**
- 3. Are there any Strategic Policies that could be left out?**
- 4. Is there anything missing?**

The Group was initially given the option to comment on Policies 1 – 6 as a whole before going on to discuss Policies 1-7, however no group members had any comments.

#### **Strategic Policy 7**

7. Non Nuclear Energy Development that contributes to Pembrokeshire’s role as a National Centre for Energy supply and production, in particular from renewable energy sources, will be supported.

- In terms of wind farms some people may disagree with this policy.
- Wind farms could impact negatively on tourism and the environment.
- There was a discussion on issues that might arise should the construction of a wind farm within the County Council’s planning area but close to the National Park be proposed. It was felt that the construction of wind farm in such a location might have an adverse impact on the landscape of the National Park.
- The policy is too broad e.g. the use of “any”.

- The policy does not add anything to the distinctiveness of Pembrokeshire.
- The policy is too broad to express everyone's concerns regarding this subject.
- A planning authority's role in micro-generation – and whether possible changes to national policy (for instance extensions to permitted development rights) might address the issue.
- What scale is acceptable?

### **Strategic Policy 8**

Tourism Developments which are in sustainable locations, contribute to the diversity of attractions and do not damage the environment or threaten local communities will be supported.

- What is deemed a sustainable location?
- What is meant by “threaten local communities”?
- Diversity and the issue of quality of tourist attractions.
- Could be a more positive policy if the word “threaten” was omitted and the use of “enhance” or “improve” included instead.

### **Strategic Policy 9**

The LDP will identify areas with a high percentage of Welsh speakers where mechanisms to ensure development does not have an adverse impact on communities may be required.

- Again this policy could be rephrased to be more positive.
- Use of “supports” or “encourages” as opposed to “adverse effect”.
- The challenge of achieving this – the use of the Welsh language across the County is very varied.
- Possible rewording – “...choice of mechanisms to ensure development has a positive impact on communities ...”
- Two different aspects of this policy.  
Focus on the existing areas where Welsh speakers are dominant  
Encouraging broader use of Welsh language education everywhere

- Is this to some extent beyond the remit of planning?

### **Strategic Policy 10**

The County's natural and built environment and landscape will be protected from inappropriate development and where possible enhanced.

- Could incorporate ecological issues and biodiversity, but accept that the term 'natural' (environment) captures these issues.
- The word "possible" suggests it's not definite.
- Needs something to suggest that a change must or will happen.
- Consistency in the use of language was noted again. The same words are used throughout the document e.g. 'enhance', 'inappropriate', 'appropriate'.

### **Strategic Policy 11**

Mineral and waste sites and resources will be provided and/or safeguarded in accordance with the Regional Technical Statement for Minerals and the South West Wales Regional Waste Plan.

- The group had no comments.

### **Strategic Policy 12**

The Retail Hierarchy for Town Centres is as follows:

Haverfordwest

Pembroke Dock and Pembroke

Milford Haven

Fishguard

Narberth

All new retail development should be consistent in scale with the size and character of the Centre and its role in the hierarchy. Town Centre boundaries will be defined for these centres.

- The group needed some clarification as to what the policy meant before discussion went ahead.
- The group disliked the term hierarchy although there was acceptance that Haverfordwest should be a higher order centre because it is the County town.

- The other towns were to an extent complementary (and possibly all on the same level in the hierarchy).
- Including the hierarchy makes this more of a statement rather than a policy.
- The group feels that the first half of the policy (the hierarchy) could be removed, with a revised version of the final paragraph retained as the policy.

### **Closing Comments**

- Strategic policies that support sustainable rural communities are missing.

### **Session 3**

## **LEVEL OF GROWTH OPTIONS**

*Following a short presentation, the group was asked:*

### **1. What is your preferred level of growth option?**

- Consensus amongst the group is that the High Growth Option would have more chance of meeting need.
- The group posed the questions, how realistic is the High Growth Option? Will it deliver? What are the implications of choosing his option?
- The group requested that a specific policy would need to be put in place if the High Growth Option was chosen.

### **2. Why?**

- Need for an Option which gives choice.
- County needs housing that responds to need.
- More land available will see house prices decrease which will be the case with Growth Option 3.
- The less land available will see an increase in house prices which will be the case with Option 1.

- There was a caveat to previous bullet points that housing markets operate at a broader-than-County level and hence varying supply would not necessarily alter house prices in the manner indicated.
- However the group was concerned that this option may lead to a bigger range of sites but reduced organisation as development will not take place at a given point in time.

## **2. Is there any other level of growth that you think would be better?**

- Could there be a 4<sup>th</sup> Option?

General comments made by the group with regards to growth options:

- Homelessness and immigration are pressing issues that need to be considered. Addressing need should be in terms of homelessness, in migration, affordable housing, changes in household size and changes to the age structure of the population (in particular the trend for people to live longer).
- Can the assessments use Census data?
- Whichever growth option is chosen it needs to match up to housing need as there is a substantial affordable housing backlog which is an important issue. Issue of backlog – Can the high growth option realistically be provided and achieved in terms of addressing housing need?
- Who will deliver housing provision?
- How often will the growth options be reviewed?
- Is there any possibility of including a new settlement / eco-settlement within the proposals?
- Why is the Low Growth Option so low if it is based on assessments and trends when it is commonly known that need is so significant?
- Issue of profit?
- Choice – when releasing land? Who does it get released to?
- Can there be phasing policies (yes, this is possible)?
- Importance of realism.



## **SPATIAL OPTIONS**

Following a short presentation, the group was asked:

### **1. *What is your preferred spatial option?***

All but one group member preferred the special option 3.

### **2. *Why?***

- Spatial Option 3 has more flexibility; however, a 50/50 split may not be welcomed by rural communities that do not want to see overdevelopment taking place.
- Spatial Option 3 would have the most wide ranging distribution of housing growth.
- If Spatial Option 3 was adopted how would the policies reflect the distribution of housing according to need?
- Spatial Option 3 may result in people having to travel further to reach services.
- General consensus is that Option 3 will result in a more widely distributed growth pattern.

### **3. *Would a combination of options better meet the Vision and Objectives? What would it look like?***

- Proximity to employment is a key issue in choosing a Spatial Option.
- Accessibility to and around Haverfordwest needs to be considered as an important issue, irrespective of the options chosen. Transport facilities are also a key issue. Possibility that transport links are too weak to support Spatial Option 3.
- A concern about Spatial Option 3 is the employment issue.
- One member of the group favoured a combination of Spatial Options 2 and 3.
- One member of the group would like to see Spatial Option 1 as it will improve infrastructure the most out of each of the three options by developing and concentrating on the main hubs first and then the wider areas.

### **Opportunity for General Questions**

No group members had any general questions to ask at the end of the meeting.

## **GROUP 3**

**Facilitators:- Philippa Dodd, Jonni Tomos**  
**Planning Representative:- Pete Sedgwick**

### ***Stakeholders attending:***

Mr Dean Chapman, WAG  
Mr Charlie Mason, PAVS  
Mr Stuart Irwin, Hywel Dda NHS Trust  
Mr Nigel Ajax Lewis, Wildlife Trust  
Mr David Sandy, SWWITCH  
Ms Angela Carey, SWTRA  
Ms Martina Dunne, PCNPA  
Ms Andrea McConnell, CCW  
Mr Richard Crawshaw, South West Wales Economic Forum

## **Session 1** **THE VISION**

*“In 2021 Pembrokeshire will continue to be an attractive place in which to live and visit. There will be strong, sustainable communities supported by robust, diverse, prosperous economy. These will be based on the area’s unique environment, cultural identity, maritime access and internationally important energy and tourism opportunities”*

The group were asked the following questions when considering the vision:-

1. Is the Vision distinct and relevant to Pembrokeshire?
2. Is it clear what sort of place Pembrokeshire should become?
3. Is the Vision balanced between economic, social and environmental aims?

In considering the questions, the following comments were made:-

- The vision is a hybrid of the Wales Spatial Plan and the Community Plan and neglects to address the LDP’s role as the Land Use plan.
- The vision doesn’t relate at all to the social, well-being of residents. Suggested that ‘*well-being*’ or “*equality*” should be added.
- The vision should be more distinctive to Pembrokeshire and relate to the complementing settlement structure of the main towns.
- A vision will be more coherent once a preferred strategy has been chosen.

- The public sector should be recognised as being a major part of the economy (if the vision is to list the key components of the economy).
- Is Pembrokeshire genuinely '*an internationally important*' area in energy? Suggested that the vision should reflect an ambition to be seen internationally as a model of responsible / innovative energy production / harnessing.
- What does '*sustainable communities*' actually mean? Consider '*mutually supportive communities*' or "*social cohesion*" as an alternative.
- An updated vision might wish to address recent developments in the field of planning, e.g. the Planning Bill.
- Consider re-wording '*Pembrokeshire*' to '*area*' to avoid confusion with the National Park Authority's remit.
- Over-ambitious in proposing that all communities should be 'strong'.
- One suggestion that '*continue to*' should be omitted from the statement.
- It was suggested that the existing economy is already '*robust*' so the wording '*there will be*' is misleading.
- The vision could benefit from being "*unpacked*". It is currently short, but could have a series of statements to sit underneath it, to clarify/expand on certain points. It needs "*more flesh on the bones*".
- Pembrokeshire should aim to be a "*low carbon – high energy*" County.
- "*These will be based*" could be replaced with "*Under-pinned by*"

Also mentioned during this discussion:

- The whole document over-uses '*sustainable*' as a catch-all term. It should only be used appropriately following a definition. Most of the group agreed with this comment.

## THE OBJECTIVES

The group were asked to consider all 24 objectives within the draft plan. They were asked to place each objective under one of the following headings:-

*Would help achieve the vision*

*Not sure/maybe*

*Would not help achieve the vision*

### **Would help achieve vision**

A: To provide land for community facilities and services.

- No comment.

C: To support Pembrokeshire's cultural and linguistic heritage.

- Suggestion that '*diversity*' should be added after word cultural.

E: To improve strategic accessibility to and from the ports and main towns of Pembrokeshire.

- The term accessibility has connotations for disabled access etc. but the objective deals specifically with transport and this could be made more explicit. Rather than accessibility the issue is more to do with connectivity.
- The objective is to improve links between Pembrokeshire and the rest of the region/country as well as within the County. This should be clarified in the wording.
- Remove the word "strategic".
- Make it clearer.
- The objective might read better as:  
"To improve transport links into the County and to the ports and main towns of Pembrokeshire."

F: To improve infrastructure at the Pembrokeshire ports and provision of associated facilities including employment sites at gateway sites.

- It was felt that objective F covered objective J and that the latter was therefore unnecessary.

G: To improve local accessibility particularly within and between the main towns of the plan area.

- Needs to refer directly to transport rather than accessibility.
- There could be a general objective to reduce the need to travel.
- What about the smaller communities. We need to be careful not to focus all our efforts on the main towns.

H: To improve access to quality, high speed broadband technology and to other communications infrastructure.

I: To develop a robust, diverse, competitive and sustainable local economy including the marine and energy sectors.

- Remove reference to develop (in all objectives – not just in I) and replace with either support/under-pin/contribute to.
- Why single out two sectors? The objective could end at the word “economy”.

J: To support development of the Pembrokeshire ports.

- Combine with F.

K: To support sustainable rural development and agricultural diversification initiatives.

- Make objective more succinct, e.g. “To support the rural economy.”

L: To develop a year round sustainable tourism offer based on quality visitor accommodation and a variety of diverse attractions.

- Re-word to *“To support a year round good quality tourism sector.”*
- Using the word “quality” is ambiguous without qualifying whether we mean good quality.

M: To support the regeneration and enhancement of Pembrokeshire’s town centres, building on their distinctive but complementary roles and where necessary tackling the qualitative issue in terms of retail provision.

- Objective is too wordy. Keep it succinct, e.g. “To support the regeneration of Pembrokeshire’s town centres.”

- The issue of complementarity deals with how you will meet the objective and is better placed in the strategy and policy detail rather than the objective.

**N:** To provide opportunities for lifelong learning, through the provision of training and educational facilities to create a multi-skilled and adaptable workforce.

**O:** To provide appropriate health and care facilities.

- Suggested removing “provide” to read “To support appropriate health and care facilities.”

**Not sure/maybe**

**B:** To meet the housing needs arising within the County Council’s planning area.

- Housing growth and economic growth shouldn’t be thought of mutually. This objective should be split, to incorporate “economic” and “social” needs.
- The wording should incorporate “affordable” and “market” elements

**Would not help achieve the vision**

**D:** To locate Housing where infrastructure is available and in sustainable locations.

- Not essential as an objective.
- This is not an objective in itself.
- Depends on the chosen scale of growth.
- Assumes infrastructure capacity and existing concerns over infrastructure should not be allowed to inhibit LDP’s ambition.

**General comments included:**

- Take out references to sustainable, as unless defined, its use is meaningless. Instead consider having an overarching objective of sustainable development defining what is meant by it.
- Replace the word “development” with support, as the LDP will not directly lead to development, it will instead facilitate development.
- Make objectives more succinct.

Unfortunately, the group ran out of time and were unable to discuss the remaining objectives:

**P:** To provide appropriate recreational open space facilities.

**Q:** To use resources efficiently.

**R:** To manage waste efficiently and sustainability.

**S:** To protect and enhance the landscape and countryside.

**T:** To safeguard archaeological, built and natural heritage (including mineral reserves).

**U:** To enhance the built environment, ensuring high quality sustainable design and local distinctiveness.

**V:** To reduce, and adapt to, the effects of Climate Change.

**W:** To protect and enhance biodiversity.

**X:** To develop Brownfield sites in preference to Greenfield sites where appropriate.

## **Session Two**

### **STRATEGIC POLICIES**

This group considered strategic policies 1 – 6, and were asked the following questions.

**1. Are the policies clear?**

**2. Will they deliver the aims of the LDP Vision and Objectives?**

**3. Are there any Strategic Policies that could be left out?**

**4. Is there anything missing?**

**1: All proposals must deliver Sustainable Development. This will require proposals to demonstrate how positive economic, social and environmental impacts will be achieved and adverse impacts minimised, where possible.**

- The group had a debate around the caveat '*where possible*' – this was considered to weaken a very positive opening sentence.
- Some group members suggested that it might be too ambitious for the area.

**2: An affordable housing target will be set to meet newly arising affordable housing needs and where possible contribute to meeting the backlog of need identified in the Local Housing Market Assessment. Allocated sites on which affordable housing will be negotiated will be in settlements identified in the preferred strategy.**



- A policy on market housing provision is required alongside this one.
- One group member raised concerns about the methodology of the Local Housing Market Assessment, suggesting removal of the reference to it in the Policy.
- There was comment on the reference to backlog and newly arising need and that it might imply that newly arising need will be met as a priority first and those on the backlog waiting list will be less of a priority. This requires firmer/clearer wording.

**3: The accommodation needs of gypsies and Travellers within the plan area, as identified in a Gypsy Needs Assessment, will be provided for.**

- No comments or suggestions for change.

**4: Sufficient employment land to meet the employment requirements of the County will be provided on a mix of strategic and local employment sites in locations identified for development in the Preferred Strategy.**

- No comments or suggestions for change

**5: Proposals for transport routes and improvements that deliver the emerging Regional Transport Plan for South West Wales will be safeguarded. In particular improvements to road and rail links to the Pembrokeshire ports, to port facilities and to the Pembrokeshire towns will be supported.**

- It was felt that routes rather than proposals for routes were being safeguarded and wording should be changed to reflect this.
- The second sentence is unnecessary. Reference to particular improvements suggests the Authority will pick and choose out of the RTP which will be safeguarded. End the policy at “safeguarded”.
- Re-wording to simpler language would widen its scope.
- The policy needs to refer to “land”.
- How do you “safeguard” a proposal?

## **6: Proposals for sustainable travel improvements will be supported.**

- Unclear meaning and greater specificity required – i.e. does it relate to public transport, personal car use? If so should more clearly state this e.g. proposals that reduce reliance on the car will be supported.

## **Session Three LEVEL OF GROWTH OPTIONS**

Following a short presentation, the group were asked:-

### ***What is your preferred level of growth option?***

There was no clear group consensus, with only three people expressing a definite preference. Two specified a low growth option and one person specified a medium. Others were leaning towards a medium-low level of growth, and one person leaned towards a high growth option.

### ***Why?***

- Current economic conditions may mean high growth is an unlikely aspiration.
- One person felt strongly that sustainability would be most likely achieved through as low growth as possible (even lower than the low growth option), allowing development of affordable housing to meet needs and very little market housing developments. He felt that the link between housing growth and economic growth was not proven and that higher GDP should be achieved with the existing population.

### ***Is there any other level of growth that you think would be better?***

One person wanted less than the lowest growth option. No other alternatives were suggested.

### **Other comments included:**

- Displacement will mean new builds will be required.
- We need to tackle the affordable housing targets.
- Why link employment with affordable housing?
- Indigenous business for indigenous population.

- Do we have enough waste water treatment works to support these developments.

## **SPATIAL OPTIONS**

Following a short presentation, the group were asked:-

### ***What is your preferred spatial option?***

Similar to the growth option, there was no clear group consensus. Although if pressed most delegates would veer towards the second option of a 60-40 urban rural split, based on the Wales Spatial Plan. There was support for development near existing services. The importance of co-locating employment and housing to reduce the need to travel was also raised.

The need to take account of cross boundary issues with Carmarthenshire and Ceredigion and in particular with the National Park was raised. It was suggested that blocking PCNP out of the spatial option maps was confusing and looked incongruous.

There were concerns that the settlement hierarchy approaches in each Authority are different. They should be checked to ensure the conclusions reached are similar in terms of the role of different settlements as this will be important when the Authorities' plans are tested for consistency and soundness.

### ***Why?***

***Would a combination of options better meet the Vision and Objectives?***

***What would it look like?***

### **Other comments included:**

- Option Two is closest to the National Park Authority's.
- There are pros and cons of all three.
- We don't have the full picture, because the National Park has been left off the maps.
- It would be socially divisive to go for option one.
- Choose the best bits from all three.
- Food security will be a major factor in the future.

- We need to keep an eye on the rising sea level, which could be 80cm in the next 100 years.
- It's of paramount importance that the Council and National Park Authority work closely together, as well as with our neighbours Carmarthenshire and Ceredigion.
- Co-location issues need to be addressed.
- It's important to note that Pembrokeshire is a single County, but has two Local Planning Authorities.

## GROUP 4

**Facilitators:- Coleen Raymond, Dunya Hurley**  
**Planning Representative:- Emma Evans**

***Stakeholders attending:***

Mr Jamie Edwards, Uzmaston Projects Ltd  
Ms Jessica Morgan, PLANED  
Mr Paul Woolman, Pembrokeshire Business Network  
Mrs Ann Evans, PCC (Education)  
Mr Michel Regelous, PCNPA  
Mr Andrew Davies-Wrigley, PCC (Housing)  
Mr Paul Evans, Hywel Dda NHS Trust  
Mr Ben Diment, Chevron  
Mr Roger Williams, South Wales Trunk Road Agency

### **Session 1**

#### **THE VISION**

*“In 2021 Pembrokeshire will continue to be an attractive place in which to live and visit. There will be strong, sustainable communities supported by robust, diverse, prosperous economy. These will be based on the area’s unique environment, cultural identity, maritime access and internationally important energy and tourism opportunities”*

The group were asked the following questions when considering the vision:-

1. Is the Vision distinct and relevant to Pembrokeshire?
2. Is it clear what sort of place Pembrokeshire should become?
3. Is the Vision balanced between economic, social and environmental aims?

In considering the questions, the following comments were made:-

- Agriculture along with tourism and energy should be emphasised in the vision as major economic contributors.
- Replace ‘cultural identity’ with culture, identity and heritage.
- The whole group agreed that we should replace ‘Attractive’ in the vision statement with ‘Desirable’, so that it is wider than just the visual appearance of the County. Density issues may impact upon attractiveness.
- It would be useful to know the percentage employed in Tourism, energy and agriculture.

- Environment should be defined further....suggested 'natural environment'
- 'Inclusive for everyone' should be added to vision statement
- Protect and enhance the natural environment while developing internationally important industry.
- Other words they felt needed to be strongly reflected in the vision were 'Sustainable', as this is a thread throughout many of the objectives, and it was suggested that possibly 'accessible' needs to have more emphasis within the vision.

Overall:

- Generally all happy with the vision statement, just slight changes to some of the wording.

## **THE OBJECTIVES**

The group were asked to consider all 24 objectives within the draft plan. They were asked to place each objective under one of the following headings:-

*Would help achieve the vision*

*Not sure/maybe*

*Would not help achieve the vision*

### **Would help achieve vision**

A: To provide land for community facilities and services.

- Sustainable communities need a certain amount of community facilities – we need to define what this means otherwise the objective is meaningless...
- Does it mean provision of land or actual facilities – open space or the equipment?
- Possibly we could re-word this objective to say “to allocate land...”
- Possibly combine with objectives O & P, along with education, to make this objective clearer?

B: To meet the housing needs arising within the County Council's planning area.

- High support for this objective but debate on what the figures were based on – demand? LHMA? Aspiration

C: To support Pembrokeshire's cultural and linguistic heritage.

- Support for this objective in all areas, must ensure certain areas do not suffer from imposing policies in existing Welsh speaking areas only.
- Possibly combine with Objective 'T'.

D. To locate Housing where infrastructure is available and in sustainable locations

E: To improve strategic accessibility to and from the ports and main towns of Pembrokeshire.

- Use term 'Expand' or 'Maintain' instead of 'Improve'
- Possibly remove 'main towns' so that the policy is about Pembrokeshire as a whole?
- Is this Objective referring to roads? These can cause people to leave Pembrokeshire (e.g. for shopping, work) as well as enter Pembrokeshire – need to look at other Counties and see what has happened to them by opening up the County – Cornwall possibly?
- Also possibly refer to SWWITCH in this objective?
- Being remote from markets can be a positive thing – it maintains the unique identity of local markets)

F: To improve infrastructure at the Pembrokeshire ports and provision of associated facilities including employment sites at gateway sites.

- Use term 'Expand' or 'Maintain' instead of 'Improve',
- What about Marinas?
- Why are ports cropping up so much – are they a large employer?
- Does Ports refer only to the main towns? What about smaller harbours?

- The Ports need to be fit for purpose. Is it up to us to decide where they go, or should the market decide?

G: To improve local accessibility particularly within and between the main towns of the plan area.

- Perhaps include accessibility in vision.
- Should this objective read accessibility to services? Parking?
- By 2021 access to beaches and leisure may be more important than access to towns? Or is this about access for all?
- Need to clarify further what services this objective will improve accessibility to.

H: To improve access to quality, high speed broadband technology and to other communications infrastructure.

- All agreed this was important for the vision

I: To develop a robust, diverse, competitive and sustainable local economy including the marine and energy sectors.

- Could 'sustainable' be put at the beginning of vision
- Very high support for this objective

K: To support sustainable rural development and agricultural diversification initiatives.

- Comment; add 'agriculture' as an industry to be supported, this may involve diversification initiatives.
- The Objective should read "to support agriculture and rural development." Although there were questions on what 'rural development' actually means?
- Need to add agriculture to the vision and then this will link to that



L: To develop a year round sustainable tourism offer based on quality visitor accommodation and a variety of diverse attractions.

- Add 'activities' as well as 'attractions'.
- Could start with 'to support and improve' instead of 'develop'.
- Also felt that 'diverse attractions' didn't cover enough scope and should be broken down a bit more to say something about man made and natural attractions/activities and culture

M: To support the regeneration and enhancement of Pembrokeshire's town centres, building on their distinctive but complementary roles and where necessary tackling the qualitative issue in terms of retail provision.

- Improving instead of building
- Need to clarify when saying 'qualitative issue in terms of retail provision' does this mean enticing high quality high street chains to our towns rather than lower quality shops?

N: To provide opportunities for lifelong learning, through the provision of training and educational facilities to create a multi-skilled and adaptable workforce.

- To provide accessible opportunities...
- 'Access' to learning and educational facilities needs to feature in objective.

O: To provide appropriate health and care facilities.

- This Objective could be combined with A and P to create 1 Objective?
- Also should 'Health' be mentioned in the vision statement?
- Could words 'improve' be put in instead of 'provide' and could 'appropriate' be removed from both

P: To provide appropriate recreational open space facilities

- To improve recreational open space facilities instead of to provide appropriate...
- Suggested that objective 'O' and 'P' be included in objective 'A' under sustainable facilities.

Q: To use resources efficiently

- Who will be monitoring whether this is achieved?

R: To manage waste efficiently and sustainably.

- There was a suggestion that 'manage' be replaced with 'reduce waste generation'.

S: To protect and enhance the landscape and countryside.

- Suggested including 'Marine environment' within this objective.
- Will this objective be used against wind power?

U: To enhance the built environment, ensuring high quality sustainable design and local distinctiveness.

- High quality is paramount!

V: To reduce, and adapt to, the effects of Climate Change.

- What are the requirements going to be?
- Is this repeating a national policy?
- Perhaps we should expand this policy to reflect energy standards on new builds and extensions?
- What about bringing in air/water quality objectives

W: To protect and enhance biodiversity.

- Including 'Marine environment' as well as land in this objective.

X: To develop Brownfield sites in preference to Greenfield sites where appropriate.

### **Not sure/maybe**

D: To locate Housing where infrastructure is available and in sustainable locations.

- What does this mean? We need to make this policy stronger/clearer.
- Making Pembrokeshire an “attractive” or “desirable” place to live may not necessarily mean development in sustainable locations!
- Possibly re-word to read “To locate housing where infrastructure is available and with reasonable access to sustainable locations/facilities and services”
- This objective does not support sustainable communities as infrastructure is not the only consideration! It is possible to develop infrastructure.

### **Would not help achieve the vision**

J: To support development of the Pembrokeshire ports.

- Very similar to ‘F’ could these two objectives be incorporated into one, along with Marinas?
- What’s the difference between support and improve – why has support been used in some instances and improve in others?

T: To safeguard archaeological, built and natural heritage (including mineral reserves).

- Could be incorporated into ‘C’.

### ***Points not covered in objectives***

- Objective to develop maritime facilities including marine environment.
- No mention of soils – impact on the carbon cycle, could be implied in natural heritage objective.
- Affordability and population demographic.
- Employment sites apart from the ports (or make objective I clearer).
- Could add additional operational objectives to achieve WAG targets, e.g. for carbon reduction – to make this achievable?
- What about Pembrokeshire’s fishing industry?

Following the discussion on the objectives, group members were given three dots each and asked to place them alongside the objectives that they felt were the most important in helping to achieve the vision.

The following objectives were seen as important:

### **High support for objective**

I: To develop a robust, diverse, competitive and sustainable local economy including the marine and energy sector.

S: To protect and enhance the landscape and countryside

V: To reduce, and adapt to, the effects of Climate Change

### **Support for objective**

K: To support sustainable rural development and agricultural diversification initiatives.

L: To develop a year round sustainable tourism offer based on quality visitor accommodation and a variety of diverse attractions

Q: To use resources efficiently

R: To manage waste efficiently and sustainably

## **Session Two STRATEGIC POLICIES**

This group considered strategic policies 6 – 12, and were asked the following questions.

- 1. Are the policies clear?**
- 2. Will they deliver the aims of the LDP Vision and Objectives?**
- 3. Are there any Strategic Policies that could be left out?**
- 4. Is there anything missing?**

### **6: Proposals for sustainable travel improvements will be supported.**

- Doesn't the Regional Transport Plan for SW Wales already cover this?
- Can Policy 6 be part of Policy 5? If not, why is this different? It needs explaining.
- This is not as clear as it could be – what does it include, rail, bus, cycle?
- Broad enough to incorporate all transport.

- Are the points in this strategic policy covered by another policy? If not, an explanation is needed to differentiate between transport types and what improvements are proposed.
- Is there a difference between transport and travel?

**7: Non Nuclear Energy Development that contributes to Pembrokeshire's role as a National Centre of Energy supply and production, in particular from renewable energy sources, will be supported.**

- The policy is clear, but the policy may be in direct conflict with objectives e.g. protecting the environment and biodiversity.
- Is this statement being aimed at a new power station?
- Capitalisation of 'National Centre of Energy' should be taken out unless this is a title?
- What does the role of 'National Centre of Energy' mean?
- On the back of this policy there might be cohesion between Council and energy providers' goals and a prospect of collaborative working.
- There was a lot of support for power generation from the sea.

**8: Tourism developments which are in sustainable locations, contribute to the diversity of attractions and do not damage the environment or threaten local communities will be supported.**

- It was felt that emphasis should be on the impact on the 'environment' rather than on the 'diversity' of attractions.
- 'Year round' tourism developments should be mentioned within the policy.
- Quality of developments need to be taken into account and mentioned in the policy.... It should read "Quality tourism developments..."
- Attractions could be changed to activities.

**9: The LDP will identify areas with a high percentage of Welsh speakers where mechanisms to ensure development does not have an adverse impact on communities may be required.**

- Repetition of national guidance could be made stronger if particularly relevant to Pembrokeshire's culture and heritage.

**10: The county's natural and built environment and landscape will be protected from inappropriate development and where possible enhanced.**

- The policy is clear.
- 'Inappropriate development', depending on your stance this term could be interpreted in a number of different ways, it may be better to say 'visually intrusive development' or 'development that is out of context'. Also the term 'will be protected' is more descriptive. Will the responsibility of 'protection' be with planners? Suggested that a term such as 'blending into the environment that is already there' would give a more descriptive idea of appropriate development.

**11. Mineral and waste sites and resources will be provided and/or safeguarded in accordance with the Regional Technical Statement for Minerals and the South West Wales Regional Waste Plan.**

- Why are these lumped together? Mineral and wastes sites could be developed into two separate policies – 1 for minerals and 1 for waste.

**12. The retail hierarchy for Town Centres is as follows:**

**Haverfordwest**

**Pembroke Dock and Pembroke**

**Milford Haven**

**Fishguard**

**Narberth**

**All new retail development should be consistent in scale with the size and character of the Centre and its role in the hierarchy. Town Centre boundaries will be defined for these centres.**

- Does PCC consult with PCNP on retail provision when developing the retail hierarchy?
- What about introducing an element of local decision making?

## **Session Three**

### **LEVEL OF GROWTH OPTIONS**

Following a short presentation, the group were asked:-

#### ***What is your preferred level of growth option?***

A group decision opted to adopt a hybrid growth option.

#### ***Why?***

Due to the current economic climate and its unpredictability over the next 15 years, the ideal would be to adopt a medium growth option initially with a caveat included to adopt the high growth option at a later date if the market improved.

#### **Other comments included:**

##### **High Growth Option-700 houses a year:**

- High growth option could lead to cherry picking by developers of best sites – this could be overcome by introducing phasing policies e.g. development of brownfield land and land adjacent to existing settlements first.
- Help to keep young people in county through providing a greater range of houses, however level of economic development would also contribute to out migration regardless of housing.
- Is there actually a demand for a large amount of new housing or is there just demand in popular areas for more sites? Distribution is as important as amount. Also the type of housing that is developed will affect the level of demand.
- Would high growth option allow for further purchase of second homes? If high option is chosen need to stipulate level of affordable housing allocation and make sure the market is accessible to all.
- Will the economy reflect housing demand? The new LNG development will create a lot of jobs and in migration; this will lead to greater need for housing?

- With the current economic downturn is it sensible to go with the high growth option and then ask Pembrokeshire County Council for resources? This could be unrealistic?
- 4,500 people needing housing. Downturn could increase this demand through defaulting on mortgages.

### **Low Growth Option-345 houses a year**

- The current down turn in the economic market may have an effect on where people want to develop land.
- Would this option meet demand? If not could this option contribute to inflation in house prices?

## **SPATIAL OPTIONS**

Following a short presentation, the group were asked:-

### ***What is your preferred spatial option?***

50% - 50% split was unanimously agreed to be the best option to meet development and community needs

### **Why?**

- Already occurring i.e. in Johnston developing on the back of Haverfordwest facilities.
- For Pembrokeshire to remain a desirable place to live a dispersed growth is the only option. People choose to move to, and stay in, Pembrokeshire to live in the country not the town – it is part of its unique charm and attractiveness.
- Already pressure on urban schools for places, whilst rural schools are closing down due to lack of use. There is also pressure on other facilities, such as rural shops, post offices and playgroups due to lack of young families in rural areas, this leads to the stagnation of rural villages.
- If the high growth option was used in conjunction with this split it could lead to developers developing rural areas first – this could be overcome by introducing phasing policies e.g. development of brownfield land and land adjacent to existing settlements first.



- Dispersed housing with employment and services – locating employment and housing in close proximity to reduce the pressure on existing infrastructure and utilities.
- It was agreed that there is still a need for some strategic employment land, most likely to be located near to the existing sites along the Haven Waterway.
- This option is the most achievable option and also the most realistic in economic terms.

#### **Other Comments:**

#### **30%-70% split**

- Most affordable housing is already in urban areas. Will further development concentrated in urban areas continue to draw people, especially young people from the rural areas? Increasing the negative effects of gentrification.
- Will the infrastructure be able to cope with further expansion within the towns? Congestion, sewerage at capacity?
- Already large allocation of housing in Haverfordwest i.e. Slade Lane (1000 houses).

#### **FURTHER COMMENTS RECEIVED FOLLOWING THE EVENT**

Dear Sir/Madam,

I attended the Stakeholders meeting representing PAVS, but also substituting for Jake Hollyfield (West Wales Eco Centre) at his request.

During the Stakeholder meeting on Monday I was told that any issues which were not covered on the day, due to time constraints, could be forwarded to the LDP team by the 12th Dec. I would also like to 'feedback' some questions and comments on the presentations as we were encouraged to do, rather than use the hard copy forms provided on the day.

1) In the draft LDP there is a section on the **Economy** which identifies the key sectors. For some reason there is no specific mention of the public sector. I wonder if this is an oversight? I ask this because public funds make up about 60% of all spend in the County economy and public services have a key role both in employment and job creation terms but also in supporting local enterprises through procurement policy.

2) The **Introductory Presentation** provided delegates with an overview of the policy basis for the LDP vision and objectives. A couple of points;

i) The Planning and Compulsory Purchase Act 2004 was mentioned as providing the LPA with the duty to **encourage** Sustainable Development.. According to the LGA web site, Section 39 of the 2004 Act states that " LPAs have a statutory duty when preparing the LDP to exercise their

functions to **contribute** to Sustainable Development". I'm sure you will appreciate that 'contribute' suggests a more interventionist role for the LPA than 'encourage'.

ii) The policy basis did not refer to the Planning Bill 2007/8 which is likely to become an Act during the current LDP process. This will place a new duty on LPAs to incorporate Climate Change mitigation and adaptation into LDPs, e.g. the Community Infrastructure Levy and Section 106 as well as CPO powers can be used.

iii) The policy basis made no mention of WAG's Sustainable Development Scheme which I am sure you must be aware is currently being consulted on. Again this is likely to be finalised during the LDP process. The SD Scheme has objectives which will have a profound impact on planning, particularly the aim to significantly reduce our ecological footprint within a generation and to drastically reduce CO2 emissions as well as giving higher priority to social equality. A low carbon, low resource society with greater equality is a major 'agenda' change. This is reflected in the adoption of GVA (gross added value, ie productivity per capita) rather than GDP as a measure of growth and the emphasis on well-being rather than wealth.

### 3) The **presentation on Sustainable Development and Sustainability Appraisal**,

i) While useful in showing that SD is integrated into the LDP production process and content, it could have been more up-to-date in terms of the definition of SD. Brundland was used but both Cynnal Cymru and the UKSDC have a more prescriptive and less ambiguous definition (I have e-mailed these to Michelle Webber). The group discussion concluded that the terms 'sustainable' and 'sustainability' were used inappropriately throughout the LDP.

ii) A further difficulty, which was highlighted in group discussion, was the difficulty of resolving economic, social and environmental objectives. This was not considered as part of the presentation, which would have been useful in terms of facilitating group discussion. The approach adopted in the Strategic Policies seems to be that the adverse environmental impacts of development will be minimised 'where possible'. This is not consistent with the approach advocated in the WAG/UKSDC briefing note on Sustainability Appraisal for Community Planning, which I have forwarded to Michelle Webber.

### 4) **The presentation on Growth Options**

i) This presentation made the assertions that, "GDP growth needs inward migration" and that "the Higher Growth option fosters higher economic development and GDP". However no evidence was made available to support the assertion that there is a causal link. Certainly Pembrokeshire continues to qualify for European funds on the basis of GDP 20% lower than the EU average and social deprivation and low pay stubbornly persist. The difficulty with GDP as a measure is that it does not identify consumer spend per capita. If wealthy 'in-migrants' are attracted to the County it is not clear how, or if, this benefits the less well off and low paid, yet social justice and well-being are key SD principles. In fact the Joseph Rowntree Trust has reported on poverty and social exclusion in Wales (2005) and concluded that the public sector and tourism 'host' a significant number of 'low paid workers'.

ii) The potential for indigenous growth with a low in-migration rate was not presented as an option to be considered. What is the reason for this?

iii) On the same theme of alternative growth options, the economic, social and environmental (Climate Change) trends, supported by scientific and academic evidence and documents such as WAG's SD Scheme, suggest that a low growth/stable state, or even 'managed decline' options should be considered if only for contingency purposes. As one delegate recounted, there are communities in parts of Wales who are already discussing the 'displacement effect' of sea level rise and flooding. With evidence from the EU that sea level rise this century will be far greater than the IPCC prediction of 80 cms by 2100, with figures of 1.5m to 2m being predicted. It might be wise and prudent for the LDPs of both PCC and PCNPA to consider residential displacement. Such a plan would require residential land to be identified and to do so would inevitably influence the proposed options.

5) **Objectives** : As our group was only able to discuss Objectives A-O in the time available I would like to add that:

Objective Q: The WAG SD Scheme calls for a dramatic reduction in resource use to reduce the ecological footprint of Wales.

i) One aspect of this is food production and transport miles. The UK Government has recently set up a National Food Council to consider food security and advisers to the Government predict that

individual preferences will have to give way to a system in which government and industry decide what food is sold as global trends in food supply and demand rapidly change (Chatham House report, October 2008). On this basis it would be prudent and visionary for 'food security' to be a strategic issues which the LDP could accommodate in policies related to allotments and residential space standards allowing for larger gardens, and rural development.

ii) There is no objective specifically related to renewable energy, yet Feed in Tariffs (FIT) are included in the Energy Bill and , as the experience in Germany shows us, generate a 'revolution' in energy production . The inevitability of FITs suggests the impact upon spatial planning , landscape, development and building design, etc. should be incorporated into the LDP . Objective S: refers to protect and enhance. With sea level rise becoming a concern, the scale of protection will be an issue determined by public funds, public perception and the insurance industry.

#### **6) Strategic Policies**

Group C considered SP's 1-6. I offer some thoughts on;

SP 7: In the interests of a 'low-carbon/high energy' future (to which PCC is committed), but with the inevitability of some fossil fuel based energy generation, this SP should include support for the most energy efficient form of generation using fossil fuels. For example CHP, rather than CCGT, from which hot 'waste' water can be used for heating rather than being directed into water courses and the sea. This policy would also contribute to the EU targets for CHP energy generation. Such an SP would support and give further expression to Objective Q

SP 8: As with a number of SPs the term 'sustainable' is not clear., and the phrase 'where possible' should be included after 'and' and before 'do' to be consistent with SPs 1, 2 and 10..

I thank you for this opportunity to contribute to the drafting of the LDP and I look forward to your response to the issues and questions that I have raised above.

Yours sincerely

Charlie Mason, Dip TP, M.Litt, MSc.

# PEMBROKESHIRE ASSOCIATION OF LOCAL COUNCILS

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S M Hurr Esq  
Development Plans Officer  
Pembrokeshire County Council  
County Hall  
HAVERFORDWEST SA61 1TP

4 December 2008

Dear Mr Hurr

## LDP PAPER: VISION, OBJECTIVES & OPTIONS

The timetable for the Stakeholder meeting on 8 December suggests the various aspects of the above paper which you want to address, but as it unlikely that I will have time to properly address our concerns on behalf of town & community councils is doubtful, so I am putting these ahead in writing.

pp. 17-18 VISION

The copious “spatial” references are likely to be well over the heads of most ordinary people (including myself and most stakeholders) so it quite wrong to include it here. People don’t want to know about the nuts and bolts that holds a structure together (that’s the job of the engineer). What they do want is a plan fit for its purpose in guiding development, that they can understand.

What is missing from the Vision is any reference as to how this plan will promote the social well-being of inhabitants, in development terms, which is a legal duty (s 2 Local Govt Act 2000). It can be no part of the Vision as to how far the LDP Manual is taken into account; this is, again, the engineer's job, which does not need to be apparent.

pp 25-26 OBJECTIVES

We suggest another objective:

To meet the reasonable needs of communities to develop their property  
pp 27-29 STRATEGIC POLICIES

A new policy:

There will be a presumption in favour of sustainable development proposals by local people unless demonstrably harmful to interests of acknowledged importance.

This policy should be paramount; a strategic policy to accommodate the social well-being of communities, a primary concern. This principle is well established by the courts (e.g. Thornville Properties v SoS & Stafford BC [1981], and used to be in PPGs etc.

More controversially we take issue with policy 7. Firstly because the idea that Pembrokeshire will be promoted as a national center for energy supply is incompatible with many other strategic policies designed to safeguard our land and seascape which is key to tourism. Developers will read this as encouraging on and off-shore wind-farms, and all manner of renewable energy wheezes which can have far more devastating impacts than the size or design of a home extension !

Secondly, it is irresponsible to be in denial about nuclear energy. Even this govt now admits that nuclear power stations will be needed, and the sooner PCC gets real about this issue the better for all of us.

Yours sincerely

A handwritten signature in black ink that reads "R. F. Shepherd". The signature is written in a cursive, somewhat stylized font.

RICHARD F SHEPHERD

Michelle Webber  
Sustainability Appraisal Officer  
Pembrokeshire County Council  
County Hall  
Haverfordwest  
Pembrokeshire  
SA61 1TP

**Our ref:** SH/LDP/Vision  
**LPA ref:**  
**Date:** 01 December 2008

Dear Ms Webber

**Local Development Plan Paper: Vision, Objectives and Options.  
Development Plans November 2008**

Thank you for referring the above consultation, which we received on 25 November 2008.

We welcome the opportunity to comment on the Vision, objectives and options. Our comments are provided below.

**Section 2.1: Vision – Page 17**

We agree with the approach of combining the vision for the Wales Spatial Plan and the Pembrokeshire Community Plan.

The word 'attractive' in the first sentence is possibly not strong enough, may be charming or characteristic would be more appropriate.

Also the sentence which starts 'these will be based on' would sound better if worded along the lines of 'these will be built on' or 'formed around'.

**Section 2.2: Objectives – Page 21**

*Priority A Developing vibrant communities*

Objective D – 'To locate housing where infrastructure is available and in sustainable locations'. Please define what is meant by 'sustainable locations'.

*Priority C Delivering Economic Growth based on local need*

Objective J – 'To support development of the Pembrokeshire Port', may be beneficial to include the word 'encourage' as well as support. Also Your Authority could use this objective to include reducing air pollution.

*Priority D Encouraging People to reach their potential*

Objective P – ‘To provide appropriate recreational open space facilities’, this objective could also include habitat production/development.

*Priority E Promoting a clean, healthy and valued environment*

Issue 30 – ‘waste needs to be diverted from disposal to landfill sites to meet environmental objectives and avoid significant fines’. – This issue should be reworded as it’s not very clear, also it would lead to a penalty from Europe not a fine.

Issue 37 – Loss of ...certain species and habitats. Appears vague and does this need specification? Are these protected species only?

Objective Q ‘To use resources efficiently’ this should include renewable energies such as wind, sun and water. Also it should be noted that growing crops for fuel provides a renewable source of energy.

Objective R ‘To manage waste efficiently and sustainably’ this must incorporate recycling, for householders as well as businesses. The greatest emphasis must be on minimising waste production in the first place. A possible route towards that could be by looking at the principles of Site Waste Management Plans (SWMPs). They are not adopted in Wales yet, but in England any construction project costing more than £300K (excluding VAT) must produce a SWMP. Before work begins, specific details must be assessed. These are mainly factors relating to the design of the project and the construction method and materials to be used that will minimise waste production. In addition an assessment of the types, amount and waste management action has to be taken for each material use. i.e. it identifies the proposed actions for the material - reused, recycled, recovered or disposal. If your Authority could work the basic principles of the SWMPs into your policies, this would have two immediate advantages:

- construction companies would begin to think better about their operations, how to minimise waste, and they would actually save themselves money by not over-ordering materials and paying costly disposal fees,
- they would be better prepared for the introduction of the SWMPs in Wales (the Minister for Environment, Sustainability and Housing in Wales has decided not to proceed at this stage with Site Waste Management Plans legislation.)

Objective S ‘To protect and enhance the landscape and countryside’ this objective should also include habitats, river environments.

Objective T ‘To safeguard archaeological built and natural heritage (including mineral reserves). This should really be two separate objectives as the mineral reserves seems to be an after thought.



Objective V 'To reduce, and adapt to, the effects of climate change'. How will your Authority reduce the effects? Must ensure energy efficiency and best practices to reduce the carbon footprint.

Objective W ' To protect and enhance biodiversity' – we are happy with this objective.

Objective X 'To develop Brownfield site in preference to Greenfield sites where appropriate'. In line with PPW we would encourage the re-development of brown field sites.

Areas of concern to EAW, which have not been included within the issues or objectives are as follows:

- Water quality and quantity, any water resources need to be managed sustainably.
- Contaminated land and the remediation of such land should be included.
- As agriculture is a big issue within Pembrokeshire, we should be looking to promote better soil management, to ensure healthier soils and encourage good farming practices.
- Sustainable Urban Drainage Systems for the disposal of surface water should be promoted.

### **Section 2.3.1. Strategic Policies**

Policy 1 – How can every development proposal achieve this?

Policy 6. – Proposals for sustainable travel improvements will be encouraged and supported.

Policy 7 – As per objective J, the word 'encourage' should be included.

Policy 8 - This policy should be re-worded. Also as per Objective D 'sustainable locations' should be explained. Would flood risk areas be a consideration within this policy? The phrase "or threaten local communities" needs clarification.

Policy 10 – The wording of this policy is not very strong 'where possible enhanced' sounds a bit vague, PPW states that environmental enhancements should be encouraged.

Policy 11 – This should be split in to two policies as it tries to cover two big issues within one policy and it does not work well. Also the word 'resources' should be explained.

This letter sets out our main areas of concern, if you have any queries please contact me at the address below.

Yours sincerely

**Miss LOUISE EDWARDS  
Planning Liaison Officer**

Direct dial 01437 783014

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**The final correspondence (from the Countryside Council for Wales) primarily comments on SEA (strategic environmental assessment) / SA (sustainability appraisal) issues. It also includes references to other aspects of the circulated papers.**

Dear Sir,

PEMBROKESHIRE COUNTY COUNCIL LOCAL DEVELOPMENT PLAN (LDP)  
PAPER: SUSTAINABILITY APPRAISAL OF STRATEGIC POLICIES AND  
SPATIAL OPTIONS

Thank you for giving CCW the opportunity to comment on the above options paper for the emerging Local Development Plan (LDP). Our comments are made in the context of our roles as consultation body under the Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 and adviser to the Welsh Assembly Government on matters pertaining to the natural heritage of Wales and its inshore waters.

In general, CCW welcomes and supports this report in particular the way it shows how the Strategic Environmental Assessment (SEA) process has been effectively applied to the development of the appraisal mechanism. We are particularly pleased that many of our comments on the scoping report have been implemented. However, we do have some specific comments which are listed in Annex 1.

We trust these comments are useful to you. Should you have any queries in the meantime please do not hesitate to contact Kerry Rogers in the first instance.

Yours sincerely,

Dr. D. H. Worrall  
Regional Manager, West  
Countryside Council for Wales

## **Annex 1**

SA Objectives Topic Area 2 – Human Health – CCW welcomes the inclusion of improving access to open space within this objective, but would re-iterate the importance of including the quality of the open space referred to and highlighting the advantages to both physical and mental wellbeing of natural green space as set out in the CCW Accessible Natural Green Space Toolkit and recent article in The Lancet (Volume 372, Issue 9,650).

SA Objectives Topic Area 18 – Biodiversity, Flora and Fauna – CCW welcomes the comprehensive list of biodiversity objectives listed, particularly the concept of ‘valuing’ biodiversity, but suggest changing the ‘avoid habitat fragmentation’ to ‘avoid further habitat fragmentation and encourage improved connectivity through the planning process’.

SA Appraisal methodology – the basic approach to applying SA / SEA framework objectives to LDP Objectives, strategic policies and the three spatial options is reasonable and in line with guidance. However, there are two minor points that it would be useful to clarify in the final Environmental Report. While it is hoped that strategic policies should and would contribute or, at least, not be incompatible to the sustainability of the plan, it is possible that a particular policy could be incompatible with a specific SA objective. Therefore, the report should clarify why this appraisal option was not included in the test. CCW understand that Pembrokeshire County Council will be carrying out an assessment of the draft plan as required under the Conservation (Natural Habitats, &c) Regulations, 1994, as amended (a ‘Habitats Regulation Assessment’ or ‘HRA’). We also appreciate that this is a separate process to the SA / SEA, but as the impacts of the HRA may have direct relevance to the outcomes of the SEA / SA appraisal process it is worth clarifying in the text where the three processes interact and how the HRA will influence the final assessment.

Strategic Policy 2 – Affordable Housing etc – while there is obviously the potential for quality affordable housing to contribute to health and wellbeing, it is important to note that access to open space, recreation facilities and a healthy environment is not a given and poorly sited or planned housing developments may detract from already limited resources. Therefore, a “?” may be more appropriate under contribution for SA objective 2. Similarly, poorly sited or designed houses may have adverse effects on a range of other SA indicators

(10, 11, 12, 13 and 14) so perhaps a “?” would be more appropriate rather than ‘no relationship’ under the contribution heading for these indicators. Finally, it is difficult to understand how a policy that advocates house building within existing settlement boundaries has no relationship with SA objective 21 ‘Protect, enhance and value the built heritage and historic environment’. CCW support the intention of clarifying these points by more detailed policies and would recommend including key indicators in the detailed monitoring strategy for the plan and SEA / SA.

Strategic Policy 4 – Availability of Employment Sites – the general points made above in relation to housing are equally applicable to allocating land for development / employment. This is particularly relevant to transport, climate change and impacts on biodiversity where, without careful application of sustainable design principles, the potential is to have significant negative contributions. It is acknowledged in the summary that the policy contributes very little to meeting the SA objectives and we look forward to seeing how these concerns will be addressed as more detailed information is brought forward in future assessments.

Strategic Policy 5 – Transport routes, etc – while CCW welcome and support the clear linkage between this policy and the developing local transport strategy (SWITCH), which is also undergoing SEA and HRA, we are also concerned with the emphasis on improvements to road infrastructure that this policy advocates. This is acknowledged in the summary and we support the concerns that this policy has the capacity to neither contribute, to be compatible, with the SA objectives. It will be important, therefore, that this area is given particular attention in the Environment report and when considering the selection of attributes for monitoring.

Strategic Policy 7 – Energy Development – CCW welcome the emphasis on renewable energy sources within this policy, but also acknowledge the concerns over the potential for negative contributions and a general lack of compatibility with the SA objectives depending on the detail of potential developments (locations and type). There may be significant implications for the HRA of this policy (and policy 5 – transport) which will need to be considered in the final overall assessment of the plan.

Strategic Policy 8 – Tourism Development – CCW welcome the level of precaution that the assessment applies to this policy in terms of its potential contribution and compatibility, particularly in relation to transport. However, given the emphasis on sustainability and minimising impacts on the environment, the potential positive contribution to a number of SA targets should not be understated. As always, it will be important to assess the detail when it is available and identify monitoring indicators that will enable any potentially negative effects to be quantified.

Strategic Policy 10 – Protection of Natural and Built Heritage, Landscape, etc – CCW welcomes this policy and the general positive nature is reflected in the assessment against the SA objectives. In terms of exploring synergistic effects of the plan's policies it will be important that the assessment of this policy and its implications are carried across to some of the other policy areas identified above.

Strategic Policy 11 – Mineral and Waste Sites – the application of the SA objectives to this policy illustrates both the importance of linking with other, existing, strategies and their assessments and also identifying where specific issues might need to be addressed by the plan in question. Overall, CCW agree with the assessment and support the recommendations that further assessment will be necessary on the potential impacts on water, biodiversity, landscape and geological heritage, etc – as more detail becomes available (or the policy itself will need clarification). Along with transport and development this policy may be particularly relevant in the context of the HRA.

Assessment of spatial options – the methodology of applying a number of positive, negative, null and unknown evaluations against each SA objective is a useful qualitative tool for assessing the various options. However, as there is no weighting of the evaluations and they are only a selection of the large number of potential impacts that would occur under each option, care must be taken if drawing 'quantitative' conclusions from this approach.

SA Objective 2 – while CCW understand the issues in relation to people travelling to site based recreational and healthcare facilities we would not necessarily agree that the potential for a clean and healthy environment is the same for all options. Providing the principles of the Accessible Natural Green Space are applied this may be the case, but without sensitive planning and provision, option 2 and 3 are likely to provide better access to the environment than option 1.

SA Objective 12 – providing water conservation was built into the policies (grey water recycling etc) all three options should be similar with this respect.

SA Objectives 14 and 15 – it is unclear how option 3 would result in less demand on water resources and, depending on the location of individual settlement expansion, the potential to impact on floodplain hydrology etc might be variable. Cross-reference to Environment Agency Wales developing Catchment Flood-Risk Management Plans (CFMPs), Shoreline Management Plans (existing and developing version 2) and water company Water Resource Management Plans will be required to fully evaluate the options against this objective.

SA Objective 19 – while CCW accepts that most development can be carried out so as to minimise impacts on landscape, and ideally enhance it, it is unclear how option 3 does not have a potentially greater impact on landscape than options 1 or 2 due to the fact that there will be increased urbanisation of the rural environment.