Deposit Local Development Plan 2 Pembrokeshire Coast National Park Comments made

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

= representation of support

= 'New' Site Proposed at Deposit Stage

= Statement of Common Ground – Appendix 2

= Focussed Change

= Main Issue – See Consultation Report for Authority Response

Number	Representor – number and name	Plan Reference	Plan/ Map Book Page (lead ref)	Support Object	Summary of Comment/ Suggested Change by the Representor	Officer Response (Agree/Disagree/Compromise) Pre-Examination contact	Examination Written or Speak Welsh Language
1.	**1663 Welsh Water**	**Chapter 0 General**	0	Comment	We welcome the early engagement taking place between the LPA and Welsh Water. In line with paragraph 6.4.2.17 of the LDP Manual (Edition 2, August 2015), these early discussions have enabled us to advise on the capacity available in our infrastructure where future development growth is proposed. In line with paragraph 12.1.7 of Planning Policy Wales (edition 9, November 2016), the LPA should develop a strategic and long-term approach to infrastructure provision. Due to the regulatory and financial framework that we operate within, there is the potential for disparity between LDP timeframes and investment in our infrastructure to accommodate growth through our 5 yearly Asset Management Plans (AMP). Development may therefore need to be phased later in the Plan period to allow the necessary reinforcement works to be delivered through future AMP programmes. Consideration should also be given to the viability of allocations if developers wish to bring forward their site in advance of our capital investment and fund the necessary works themselves.	Noted	
2.	**2577- National Grid**	**Chapter 0 General**	0	Not advised	No comment. Willing to provide further advice if needed. **No change requested.**	Noted.	Not advised.
3.	**1092 Lichfields (Agent) Bourne Leisure**	**Chapter 2 Where we are now Key issues to address D**: Visitor economy, employment and rural diversification	13	Support	Bourne Leisure endorses the recognition of the above key issues, particularly in relation to tackling seasonality and maintaining and enhancing the visitor economy.	Support noted.	Relying on written representations
4.	**2897 Marloes & St Brides Community Council**	**Chapter 2 Where we are now Key issues to**	13	Objection	We object to the use of the term "affordable housing". It would be much better to refer to "housing which is affordable": this would incorporate • affordable housing as per the official legal definition • Community Land Trust developments	The term 'affordable housing' is consistently used by local planning authorities and the Welsh Government. An explanation is provided in the Glossary of Terms on page 159 of the Deposit Local Development Plan which is consistent with national planning policy and guidance.	Wish to be heard in English

		address E: Affordable housing and housing growth			• agricultural and other existing buildings converted into full-time residential "starter" accommodation.	A provider of affordable housing could include a Community Land Trust for example. **Conclusion:** Disagree.	
5.	**1092** **Lichfields (Agent)** **Bourne Leisure**	**Chapter 3** **Vision** Paragraph 3.3	15	Object	Bourne Leisure welcomes this recognition of the National Park as an "unbeatable socially inclusive year round visitor destination". However, the Company considers that it is important to include a reference to the economic value of the tourism industry, as a major generator of employment and investment in the local area. Re-wording is provided.	The sentence begins by highlighting 'The Park benefits from being an unbeatable … which summaries a multitude of benefits not just the resultant contribution to tourism industry. This is considered to be sufficiently inclusive without precluding other benefits such as helping preserve rural services like buses, village shops and post offices; increased demand for local food and crafts, festivals and given that tourists mainly come to see the scenery and wildlife, there benefits through continuing to recognise the need to conserve habitats and wildlife. **Conclusion:** Disagree	Relying on written representations
6.	**1663** **Welsh Water**	**Chapter 3** **Vision**	15	Support	We welcome the Vision and Objectives of the Deposit LDP, and are pleased to note the specific reference to new development being predominantly directed to communities with sufficient services. To this end, the early engagement between the Authority and Welsh Water has helped to guide where there is sufficient capacity available in our infrastructure.	Support noted.	
7.	**2708 -** **Pembrokeshire County Council**	**Chapter 3** **Vision** Paragraph 3.4 Location for new development	15	Objection	This paragraph says that 'new development has been predominantly directed to communities with sufficient services and amenities and linked by a convenient, low-impact and affordable public transport network'. However, Tenby has no housing allocations, in spite of being the NP settlement that is likely to score highest in terms of the services, amenities and public transport. **For objections only - which tests of soundness does it fail?** Test 1 and Test 2 **Why?** Does not follow WSP which identifies Tenby as a Tier 2 settlement (TEST 1). Does not follow from Plan's evidence which indicates that Tenby is the settlement with the greatest level or services, amenities and public transport. (TEST 2) **New Site Proposed:** No (HOWEVER SEE OBJECTION TO Policy 48)	See Main Issues in the Consultation Report for National Park Authority response.	Speak – English regarding Brynhir and the Authority's affordable housing targets. (Other Officers willing to take part in the Examination if helpful – applicable for all representations that follow)
8.	**1663** **Welsh Water**	**Chapter 3** **Objectives C and F**	16	Support	Under the 'climate change, sustainable design, renewable energy and flood risk' objective we are particularly pleased to see the inclusion of the 'Soil, Air and Water Quality' objective which seeks to safeguard water quality in the Park. Similarly we welcome the 'utilities' objective which will ensure there is adequate provision of water and sewerage infrastructure.	Support noted.	
9.	**1092** **Lichfields (Agent)** **Bourne Leisure**	**Chapter 3** Objective D: Visitor economy, employment and rural diversification	19	Support	Support noted	Support noted.	Relying on written representations

10.	**1670** **Natural Resources Wales**	**Chapter 3** **Objective C**, Key outcomes (8)	19	Support	We note that you have incorporated the changes we requested at the preferred strategy stage.	Support noted	
11.	**2025** **Home Builders Federation**	**Chapter 3** **Objective E:** Housing	19	Objection	E. Affordable housing and housing growth Housing To provide for housing *to meet the needs of the area* and facilitate the delivery of affordable housing needs without compromising National Park purposes (Policy 47, Policy 48, Policy 49, and Policy 50). The HBF requests that the additional wording above in italic be included in the policy. If this change is accepted it should also be applied to the wording of Policy 3, 4, 5, 6.	The objective reflects the circumstances the National Park Authority finds itself with a declining population long term. **Conclusion:** Disagree	Rely on written representations
12.	**2910** **St Davids City Council**	**Chapter 3** **Objective D: Employment**	19	Comment.	This section references employment & the need to support the creation & maintenance of a diverse, viable & sustainable local economy, with a key outcome of safeguarding existing employment sites.	Noted.	Wishes to appear and speak English
13.	**2708 - Pembrokeshire County Council**	**Chapter 3** **Objective E**. Affordable Housing and Housing Growth	19	Objection	Currently the Objective only references housing provision as a means of facilitating the delivery of affordable housing. Reference should be made to housing delivery helping to sustain local communities. **For objections only - which tests of soundness does it fail?** Test 1 **Why?** Does not adequately reflect Well-being goal which is "Wales of cohesive communities".	As population projections would suggest there is no need to provide market housing long term for the National Park and there is no guarantee regarding how new unfettered dwellings are occupied then this is not considered appropriate – see Soundness Test 2. **Conclusion:** Disagree	Speak – English regarding Brynhir and the Authority's affordable housing targets.
14.	**2708 - Pembrokeshire County Council**	**Chapter 3** **Objective F:** Transport Suggestion for re-wording	20	Objection	The current objective is "To improve and promote accessibility by appropriate means and at appropriate times for the people who live, work, rest and play in the National Park whilst reducing the need to travel by private car. Would 'live in, work in and visit" be better than 'live, work, rest and play'. **For objections only - which tests of soundness does it fail?** Test 2 **Why?** To improve clarity of meaning.	This is a matter of semantics. 'Rest and play' captures those who may not class themselves as neither visitors nor residents but who return to visit relatives or are semi-resident in the Park. **Conclusion** – disagree.	
15.	**2897** **Marloes & Community Council St Brides**	**Chapter 3** **Objective E: Housing**	20	Objection	We object to "An estimated 960 new dwellings are delivered of which an estimated 250 are affordable". This should be amended to "An estimated 960 new or converted dwellings are delivered of which an estimated 250 are affordable." We object to the proposed high density of new housing developments: a lower housing density is typical of traditional Pembrokeshire villages. It allows larger gardens, and having good play areas and a decent space for producing home-grown food delivers many sustainability objectives.	The provision would include opportunities for conversion. National planning policy (paragraph 4.7.2 of Planning Policy Wales 9 November 2016) asks planning authorities to include policies on higher densities. Policy 50 does refer to the need to reduce densities as a result of an unacceptable adverse effect on the character of the surrounding area. **Conclusion:** Disagree.	Wish to be heard in English
16.	**3468** **Ms Sinclair CPRW**	**Chapter 4** **National Park Purposes** Policy 1 Paragraph 4.13	24	Object	We welcome the revision of the LDP and believe it to be basically sound. BUT we would like the fact referred to in paragraph 4.13 to be included within Policy 1 in view of the fact that the NP is narrow much of its area will be affected by developments outside its control. Therefore we would like the sentence in para 4.13. The Authority will use this policy in considering proposals within its planning jurisdiction and in commenting on proposals outside the National Park. To be included within Policy 1, for the avoidance of doubt.	The text in 4.13 provides advice on how the policy will be applied and is considered best placed in the reasoned justification. An Inspector's view on this would be welcomed. **Conclusion:** Disagree but would welcome an Inspector's view on the matter.	Rely on written representations

17.	**1569 - Welsh Government**	**Chapter 4 Spatial Strategy**	24	Broadly supportive	The Welsh Government is broadly supportive of the spatial strategy which seeks to locate development in line with a hierarchy, directing growth to the most sustainable locations, whilst also supporting rural areas.	Broad supported noted.	
18.	**1663 Welsh Water**	**Chapter 4 Spatial Strategy**	24	Support	We acknowledge that the Spatial Strategy (Focused Key Settlement/Hybrid Approach, with two additional tiers) is the same as in the current Adopted LDP and as such are supportive of this approach, particularly given the early engagement between the LPA and Welsh Water and the consideration of our infrastructure capacities.	Support noted	
19.	**2897 Marloes & St Brides Community Council**	**Chapter 4 Spatial Strategy** Paragraph 4.20	25	Objection	Objection: what has Carmarthen got to do with Pembrokeshire?	The paragraph provides detail on the wider spatial strategy for the region, as set out in the Wales Spatial Plan. Carmarthen has particular relevance for health provision, employment and retail for the population of Pembrokeshire – Test 1.	Wish to be heard in English
20.	**2708 - Pembrokeshire County Council**	**Chapter 4 Spatial Strategy** **Tenby**: Tenby by 2031 Paragraph 4.28	27	Objection	The vision includes a statement saying that 'new housing developed in the town contains a substantial element of affordable housing'. However, in the absence of a housing allocation in Tenby, the future provision of market and affordable housing could be of a modest scale and might not meet identified needs. **For objections only - which tests of soundness does it fail?** Test 2 **Why?** Does not follow from Plan's evidence which indicates that Tenby is the settlement with the greatest level or services, amenities and public transport. (TEST 2) Is not consistent or coherent (TEST 2) **New Site Proposed:** No (HOWEVER SEE OBJECTION TO Policy 48)	See Main Issues in the Consultation Report for National Park Authority response.	Speak – English regarding Brynhir and the Authority's affordable housing targets.
21.	**2708 - Pembrokeshire County Council**	**Chapter 4 Spatial Strategy** **Tenby** Policy 2 Tenby Local Service and Tourism Centre (Tier 2) (Strategy Policy)	27	Objection	The policies first land use priority is "to provide for and or permit housing to facilitate delivery of the affordable housing needs of the local area". Whilst PCC support this priority, it is not implemented elsewhere in the Plan with Housing Allocations to support delivery of this priority in the settlement itself. **For objections only - which tests of soundness does it fail?** Test 2 **Why?** There is no logical connection between this priority and the lack of Housing Allocations identified in Tenby. There is a lack of coherence and an inconsistency in the Plan (Test 2) **New Site Proposed:** No (HOWEVER SEE OBJECTION TO Policy 48)	See Main Issues of the Consultation Report for National Park Authority response.	Speak – English regarding Brynhir and the Authority's affordable housing targets.
22.	**4217 – Mr Fry**	**Chapter 4 Spatial Strategy Tenby Policy 2**	27	Object	There has been a decline in tourism. There are issues regarding loss of hotels, traffic management, lack of night clubs, a glut of takeaways, a lack of all year round business, poor accommodation, management of the harbour and the provision of affordable housing. **Change**: Tenby needs a catalyst, St Catherine's Island enhancement and the inclusion of a marina.	No detail has been provided on what the changes proposed to the Deposit Local Development Plan 2 should be. There are policies in Local Development Plan 2 which can provide a context for proposals at St Catherine's Island. Policies 18 and 19 provide a context for shore based facilities and operations at the harbour. The rationale for not agreeing with a marina proposal has been considered through the candidate site process – see assessment for Site 005. Issues arise in terms of Soundness Tests 1, 2 and 3. **Conclusion:** Disagree.	Not advised.
23.	**3778 S Bayes NAEG**	**Chapter 4 Spatial Strategy Newport** Policy 3a) LDP2 Deposit Version §4.31 C29 Newport Trefdraeth New Site Location	29	Objection	NAEG seeks modification of LDP2 Policy 3a) - detailed re-wording is provided relating to the control of dwellings to be occupied as a principal resident. Detailed rewording of the text for Newport in the Plan is also provided.	See Response in the Consultation Report in Main Issues regarding occupancy controls and the wording of the text.	Wish to be heard in English

		– Land adjacent to Newport Business Park Numerous documentation is referred to – see representation					
24.	**2910** **St Davids City Council**	**Chapter 4** **Spatial Strategy** **St Davids**, Paragraph 4.38	31		Pg 31 St Davids, Para 4.38: ref should be made to our strong community, primary & secondary schools & abundance of local services & facilities, including a supermarket, bank, post office, shops, pubs, community halls, doctors surgery etc.	Including a list of the range of facilities and services available to St Davids would quickly date the Plan. Account has been taken of the facilities and services available in the designation of St Davids as Local Centre. **Conclusion:** Disagree.	Wishes to appear and speak English
25.	**2910** **St Davids City Council**	**Chapter 4** **Spatial Strategy** **St Davids** Paragraph 4.39	32		Issues for St Davids: this should include provision of housing for locals, young & old. Sustaining our local community and language and culture through sustainable development and appropriate growth. The Council fields that the LDP should reference small scale employment units. There is reference here to St Justinians & Whitesands beach, but the Cathedral & OYP are also major tourist attractions, along with the dramatic & beautiful coastline surrounding the peninsula. There is reference here to traffic management being an issue, I would suggest it is lack of parking is the issue not traffic management.	The issues listed include reference to the provision of housing. The Authority can evidence the need for housing growth for affordable housing provision but monitoring of the current Local Development Plan has not shown progress with land allocations for employment purposes or mixed use purposes. Nevertheless the Plan's policy framework would enable such provision (Policy 44). The paragraph reflects current issues and the Cathedral and Oriel y Parc are not considered to be causing planning issues at present. The term 'traffic management' is a generic term to describe the issue the solution to which is currently a matter of debate. **Conclusion:** Disagree	Wishes to appear and speak English
26.	**2910** **St Davids City Council**	**Chapter 4** **Spatial Strategy** **St Davids** Para 4.40	32		St Davids is a City not a town! There is ref here to the Cloisters Project & Oriel Y Parc - aren't these now complete?! This should also reference support for the local economy & sustainable local business, retail, etc There is also a reference here to 'Traffic management measures' at St Justinians! This section should also reference our desire to create a quality visitor experience.	Apologies regarding the use of the term 'town'. This typographical error can be resolved. Agree the reference to the Cloisters project and Oriel y Parc could also be deleted as they are now completed. The support for providing for services is set out in Policy 5. The reference to traffic management is considered appropriate as this is an issue to resolve. The Plan can only deal with land use planning matters and refers in Policy 5) to a suite of policies in the Visitor and Economy Chapter covering the visitor offer. **Conclusion:** The Authority proposes a Focussed Change as set out above.	Wishes to appear and speak English
27.	**2910** **St Davids City Council**	**Chapter 4** **Spatial Strategy** **Rural Centres** Para 4.42	33	Objection	It is disappointing that the strict interpretation means no villages in the parish (except St Davids) can have housing development. In order to sustain the local community they must be allowed to grow. Our parish is not a chocolate box image, it is a living & working community.	The criteria used to select rural centres is generous in nature reflecting the rural nature of the National Park. Outside Rural Centres infill and rounding off is permitted as well as conversion of buildings in the countryside. Policy 7 provides greater detail on the opportunities available in countryside locations consistent with national planning policy – Test 1. **Conclusion:** Disagree.	Wishes to appear and speak English

28.	**2910** **St Davids City Council**	**Chapter 4** **Spatial Strategy** **Rural Centres** Footnote 55	33	Objection	I think this should include village greens, farm shops, a local milk round etc then a settlement like Caerfachell would be included. Linked to this there is very little growth in our adjoining communities, Solva for instance doesn't have a housing allocation – the council is concerned that this element of the LDP does little in terms of sustaining our communities, their facilities & most importantly our schools (Pg 114).	The criteria used to select rural centres is generous in nature reflecting the rural nature of the National Park. Outside Rural Centres infill and rounding off is permitted as well as conversion of buildings in the countryside. Policy 7 provides greater detail on the opportunities available in countryside locations consistent with national planning policy – Test 1. In terms of Solva the sites that are included in the current Local Development Plan have not come forward for development and no new suitable candidate sites have come forward – Test 3. This would not preclude the County Council owned site coming forward for affordable housing as an exceptions site should circumstances change regarding sewage disposal. **Conclusion:** Disagree.	Wishes to appear and speak English
29.	**1663** **Welsh Water**	**Chapter 4** **Spatial Strategy** **Rural Centres**	33	Support	We're pleased to note the reference to the variation in provision of water supply and sewage treatment across the settlements listed in the hierarchy and the acknowledgement that some reinforcement works will be needed. A combination of developer contributions and our own Capital Investment should ensure that reinforcement works to our infrastructure are undertaken where required to in order to accommodate sites.	Support noted.	
30.	**2708 -** **Pembrokeshire County Council**	**Chapter 4** **Spatial Strategy** **Rural Centres** Policy 6 Rural Centres (Tier 4) (Strategy Policy)	34	Support	We support the identification of the following centres as Rural Centres - Carew, Milton, Cosheston, New Hedges, Hook, Houghton, Roch, Lamphey, and Llangwm. All of these settlements are currently identified as Service Villages in PCC's LDP, which enables a similar policy approach to be followed as that proposed for Rural Centres by PCNPA. ` and Compass is currently a lower order settlement in the PCC LDP, however an initial review of facilities as part of PCCs LDP Review suggests that this settlement may move up any proposed settlement hierarchy as part of PCCs LDP 2. There is therefore a conformity of approach in relation to these cross-boundary settlements.	Support Noted.	
31.	**2897** **Marloes & St Brides Community Council**	**Chapter 4** **Spatial Strategy** **Rural Centres** Policy 6 Paragraph 4.45,	34	Objection	We propose an additional policy: h) to increase the size of the permanent rural population at least in line with United Kingdom population trends, so as to "pull our weight" as regards addressing the housing shortage crisis, while at the same time ensuring long-term community viability.	The approach to housing provision is set out in the Housing Chapter. The provision provides for some growth and follows the requirements of Planning Policy Wales Edition 9 9.2.2 which asks planning authorities to consider Welsh Government projections at a more local level – Test 1 and 2. **Conclusion:** Disagree	Wish to be heard in English
32.	**2897** **Marloes & St Brides Community Council**	**Chapter 4** **Spatial Strategy** **Rural Centres** Paragraph 4.46	35	Objection	We object to "of a size compatible with its setting". In the past the National Park has allowed huge houses, which local people cannot afford, on tiny plots, which render them useless for full-term occupation because there is no space for children's play or gardening, etc. We propose instead "of a size to suit the budget constraints and lifestyles of typical local residents".	The definition of infill and rounding off reflects a longstanding approach through various Local Development Plans to reflect the need to recognise that gaps in a frontage must be considered within their context. Is it a terrace of houses with a tight gap where a similarly sized development of 2 terraced dwellings would fit or is it a much larger gap with larger dwellings and gardens proposed but again contextually dwellings with a similar layout and form abut the site/s – Test 2. Dwellings completed vary in size depending on the context. Controls for affordable housing provision are specific and relate to price/rent, occupancy and need – Test 1. Control of a property's size (once the principle has been established) is determined in relation to its compatibility with its setting and impact on amenity of neighbouring properties. **Conclusion:** Disagree	Wish to be heard in English

33.	**2897** **Marloes & St Brides Community Council**	**Chapter 4** **Spatial Strategy** **Countryside** Paragraph 4.48	35	Objection	This is such bad English, the paragraph is rendered meaningless.	The paragraph sets out the context of issues for the areas of the National Park outside of the identified Centres – Test 2. The policies and proposals in the Local Development Plan are intended to help address these issues. **Conclusion:** Disagree.	Wish to be heard in English
34.	**2708 - Pembrokeshire County Council**	**Chapter 4** **Spatial Strategy** **Countryside** Policy 7 Countryside (Tier 5) (Strategy Policy)	36	Objection	Countryside (and other policies such as 46) The amalgamation of multiple farms to one larger farm has resulted in issues in communities where high levels of agricultural vehicle movements travel over long distances between farm complexes for the transport of food, slurry, equipment etc. Central facilities which result in this should be carefully assessed to ensure the local highway network will not be adversely affected. **For objections only - which tests of soundness does it fail?** Test 2 **Why?** Amendment required to pick up on this issue.	Issues arising from the amalgamation of farms can only be addressed when planning applications are submitted. The Plan should be read as a whole and Policy 58 Impacts of Traffic would be the relevant and appropriate policy to refer to – refer to Test 2 re keeping the Plan clear and focused. **Conclusion:** Disagree	
35.	**2897** **Marloes & St Brides Community Council**	**Chapter 4** **Spatial Strategy** **Countryside** Policy 7 a) Paragraph 4.50	36	Objection	We object to "…be prioritised for affordable housing provision." We propose "…be prioritised for affordable housing or Community Land Trust provision."	The term 'affordable housing' is the consistently used by local planning authorities and the Welsh Government. An explanation is provided in the Glossary of Terms on page 159 of the Deposit Local Development Plan which is consistent with national planning policy and guidance. A provider of affordable housing could include a Community Land Trust for example. Technical Advice Note 2 advises that local planning authorities cannot seek to prescribe who the provider should be: Technical Advice Note 12.4: Local planning authorities should not seek to prescribe through planning conditions or planning obligations which partners developers should use to provide the affordable housing, but rather should aim to ensure practical arrangements that will deliver their policy. Test 1. **Conclusion:** Disagree.	Wish to be heard in English
36.	**1092** **Lichfields (Agent) Bourne Leisure**	**Chapter 4** **Spatial Strategy** **Countryside** **Policy 7** (e, k and l):	37	Support	Reason for support outlined in detail in the submission.	Support noted	Relying on written representations
37.	**2897** **Marloes & St Brides Community Council**	**Chapter 4** **Spatial Strategy** **Countryside** Policy 7 j) Paragraph 4.50	37	Objection	We object to "…for affordable housing to meet…" We propose "…for affordable housing or Community Land Trust developments or Co-Housing to meet…"	The term 'affordable housing' is the consistently used by local planning authorities and the Welsh Government. An explanation is provided in the Glossary of Terms on page 159 of the Deposit Local Development Plan which is consistent with national planning policy and guidance. A provider of affordable housing could include a Community Land Trust for example. See also paragraph 12.4 of Technical Advice Note 2. Test 1. **Conclusion:** Disagree.	Wish to be heard in English
38.	**1670** **Natural Resources Wales**	**Chapter 4** **Spatial Strategy** **Countryside** Paragraph 4.57	39	Support	Refers to Supplementary Planning Guidance on habitats and species being prepared, we welcome this.	Support noted	

39.	**1670 Natural Resources Wales**	**Chapter 4 Spatial Strategy Countryside** paragraph 4.59	39	Support	We welcome the fact that Supplementary Planning Guidance on new farm buildings will be prepared.	Support noted.	
40.	**1670 Natural Resources Wales**	**Chapter 4 A Special Qualities Special Qualities of the National Park** Paragraph 4.64	41	Support	We welcome the fact that Supplementary Planning Guidance on Landscape Character and Seascapes will be prepared.	Support noted	
41.	**2910 St Davids City Council**	**Chapter 4A Special Qualities Special Qualities of the National Park** Para 4.65	41		Should reference St Davids' distinct character, & the historic & religious significance which make it a local & tourist hub.	The special qualities would include St Davids distinctive character. The section provides a list of qualities for the whole of the National Park. More detail is provided for individual character areas in the Authority's landscape assessment and conservation area statements for example. **Conclusion:** Agree but no change is required.	Wishes to appear and speak English
42.	**1670 Natural Resources Wales**	**Chapter 4A Special Qualities Special Qualities of the National Park** Paragraph 4.66	42	Support	Refers to the Environment (Wales) Act 2016 and the new biodiversity duty (section 6 duty), consequently your Authority will be producing Supplementary Planning Guidance on biodiversity to include guidance on ecological resilience, which we support.	Support noted	
43.	**1670 Natural Resources Wales**	**Chapter 4A Special Qualities Special Qualities of the National Park** paragraph 4.68	42	Support	states "The National Park's network of green infrastructure will be retained and enhanced to ensure it supports natural and ecological processes" we welcome this statement.	Support noted	
44.	**1670 Natural Resources Wales**	**Chapter 4A Special Qualities Special Qualities of the National Park** Policy 8 Special Qualities (Strategy policy)	42	Support	We agree with the wording of this policy.	Support noted	
45.	**2897 Marloes & St Brides Community Council**	**Chapter 4A Special Qualities Special Qualities of the National Park** Policy 8 Para 4.68	43	Objection	We object to this list because it makes no reference to people: people created the landscape of the Park by living and working in it. Part of the Park's special character, therefore, is that it supports, and has living space for, a steadily-growing resident population whose rights to maintain their occupation of the land, generation by generation, must not be ignored.	National Park purpose refers to "special qualities" (in the context of public enjoyment and understanding). The special qualities of the National Park have been identified through residents and visitors and a landscape assessment. The special qualities are: Coastal Splendour; Diverse Geology; Diversity of Landscape; Distinctive Settlement Character; Rich Archaeology; Cultural Heritage; Richness of Habitats and Biodiversity; Islands; Accessing the Park; Space to Breathe; Remoteness, Tranquillity and Wildness; Diversity and Combination of Special Qualities. The list does not include the special character proposed in the representation. Paragraph 4.65 of the Local Development Plan does however recognise the role of people in shaping the landform.	Wish to be heard in English

						Conclusion: Disagree	
46.	**1092 Lichfields (Agent) Bourne Leisure**	**Chapter 4A Special Qualities Special Qualities of the National Park Policy 8** (i): Special Qualities (Strategy Policy)	44	Support	Reason for support outlined in detail in the submission.	Support noted.	Relying on written representations
47.	**2708 - Pembrokeshire County Council**	**Chapter 4A Special Qualities Light Pollution** Policy 9 Light Pollution	44	Support	The approach is supported. Where possible the Local Highways Authority will seek to avoid the provision of unnecessary lighting including on new road adoptions. As part of the SPG developers should be encouraged to seek early agreement with the LHA to minimise lighting provision.	Support noted.	
48.	**2897 Marloes & St Brides Community Council**	**Chapter 4A Special Qualities Light Pollution** Policy 9 Paragraph 4.69	44	Objection	We object to Policy 9. We propose that, in conjunction with the PCC, the PCNPA should eliminate external cosmetic floodlighting, ban street lighting on new developments, and investigate removing existing street lighting where there is community support. A full dark sky policy would have major wildlife, aesthetic, tourism, and sustainability benefits.	Policy 9 sets out the land use planning considerations. The issues raised are beyond a land use plan. The Authority is reviewing its management plan and this is providing opportunities to consider lighting more widely. **Conclusion:** Disagree.	Wish to be heard in English
49.	**1092 Lichfields (Agent) Bourne Leisure**	**Chapter 4A Special Qualities Biodiversity** Policy 10: Sites and Species of European Importance	45	Object	Bourne Leisure considers that draft Policy 10 does not provide sufficient flexibility to allow for the assessment of proposed development on a case-by-case basis, taking into account mitigation measures. In some cases, it will be possible to mitigate adverse impact on European protected sites and species, through careful design, work scheduling or other measures. A detailed submission is provided along with proposed policy re-wording.	The approach as to how proposals are considered by the planning authority at planning application stage where they impact on Sites and Species of European Importance is prescriptive (see Annex 3 of Technical Advice Note 5). The general approach to biodiversity protection is one where issues such as avoidance then mitigation should be considered from the outset of proposal preparation. The role of the planning authority in making a judgement on integrity (paragraph 22 of Annex 3) is to consider the way in which it is proposed to carry out the project and whether conditions or other restrictions (such as a S106) would help to ensure the site's integrity will not be adversely affected. The wording of Policy 10 reflects this approach. **Conclusion:** Disagree	Relying on written representations
50.	**1670 Natural Resources Wales**	**Chapter 4A Special Qualities Biodiversity**	45	Support	We are satisfied that all comments previously made have been incorporated into the deposit plan and we agree with the wording of policies 10 – 13.	Support noted.	
51.	**1092 Lichfields (Agent) Bourne Leisure**	**Chapter 4A Special Qualities Biodiversity** Policy 11: Nationally Protected Sites and Species	46	Object	Bourne Leisure considers that draft Policy 11 does not provide sufficient flexibility to allow for the assessment of proposed development on a case-by-case basis, taking into account any mitigation measures. In some cases, it will be possible to mitigate adverse impact on nationally protected sites and species, through careful design, work scheduling or other measures. A detailed submission is provided along with proposed policy re-wording.	Policy 11 allows for avoidance mitigation etc. to be considered from the outset of proposal preparation. The process for considering impacts through Environmental Impact Assessments also includes considering avoidance, mitigation or compensation for adverse effects – see paragraph 4.5.2e) of Technical Advice Note 5. **Conclusion:** Disagree.	Relying on written representations

52.	**1092 Lichfields (Agent) Bourne Leisure**	**Chapter 4A Special Qualities Biodiversity** Policy 13: Protection of Biodiversity	47	Object	Bourne Leisure considers that the acceptability of development should depend on whether following mitigation, its impacts on protected species and their habitats are acceptable. As drafted, Policy 13 does not recognise that adverse impacts on biodiversity can sometimes be acceptably mitigated through careful design, work scheduling or other measures. A detailed submission is provided along with proposed policy re-wording.	The policy wording advises 'Development will not be permitted where this would have an unacceptable adverse effect on… 'Unacceptable adverse effect' is explained in the Glossary of Terms as 'An unacceptable harmful impact that cannot be satisfactorily mitigated.' Mitigation is explained in the Glossary of Terms as 'Measures that avoid, reduce, remediate or compensate for the negative impacts.' The amendment proposed is not considered necessary. **Conclusion:** Disagree	Relying on written representations
53.	**1569 - Welsh Government**	**Chapter 4A Special Qualities Welsh Language** Policy 14: Welsh Language Sensitive Areas (WLSAs)	48	Category C - objection	WLSAs for Community and Town Councils with 19.2% or more Welsh speaking population (paragraph 4.80, LDP) are shown on the Proposals Map; however, they should be listed in Policy 14. It is currently unclear to which settlements the policy would apply.	It is recognised that the addition of the town and community council areas listed in the reasoned justification of Policy 14 would clarify the area shown on the Proposals Map as the Welsh language sensitive area. **Conclusion:** The National Park Authority propose a Focussed Change as set out above.	
54.	**3511 Planning sub Committee of the Tenby Civic Society**	**Chapter 4A Special Qualities Historic Environment Policy 15** paragraph 4.91/2 Indirectly to C41, C42 open space, allocations, separate representation	51	Objection	A new paragraph is needed. Local development Plan, Policy15, Buildings and Spaces of Local importance First para, insert "spaces" after Buildings in line one. Additional Paragraphs after 4.92 4.93 Development shall also pay regard (e.g. by conditions to planning approvals) to the conservation and renovation of original curtilage walls or railings of distinctive character, including where they help unify the character of a group of buildings. 4.94 Where spaces contribute special qualities to their settlement/landscape setting by virtue of their history, quality, planting, biodiversity, position, outlook, association with important local events or figures, any development proposals shall conserve or enhance those qualities. Sites allocated as open space shall be protected from development. *These proposals are an appropriate way to help resolve the ambiguities of the mixed bag of types of "Open Space" allocated on the Proposals Maps for Tenby.(see separate comments on Maps C41 andC42.*	The proposed new para 4.93 concerns specific elements of the setting of historic assets, the preservation of historic curtilage features often being critical. These are not always easy to address through planning conditions, or can easily be overlooked (especially where curtilage features do not themselves form part of the development proposal). In such cases, the removal of permitted development rights via condition is an option. A proactive option could be the making of an Article 4(2) Direction removing key permitted development rights in areas of concern. A third option of course is raising awareness, thus the context of Policy 15. The policy itself does embrace setting, but there is scope for amending criterion 4.91b to 'quality of the individual building's architecture and its setting'. The Authority's Building Conservation Officer advises that as someone who often assesses building against the present Policy 14, this would allow due flexibility - allowing some weighting in favour of a building that has lost some character but retains an important and distinctive curtilage comprising e.g. locally-made railings, masonry/brick walls. In turn, this should appropriately influence the Authority's decision on any development proposal. **Conclusion:** The Authority proposes a Focussed Change as set out above.	Wish to speak in English at the hearing.
55.	**1092 Lichfields (Agent) Bourne Leisure**	**Chapter 4A Special Qualities Landscape** Policy 16: Conservation of the Pembrokeshire Coast National Park	52	Objection	Bourne Leisure considers that draft Policy 16 should be clarified to set out how proposed development will be assessed in relation to the special landscape/seascape character of the National Park, taking into account any mitigation measures proposed. Bourne Leisure considers that, as drafted, Policy 16 does not provide a TAN5-based step-wise approach, as it does not recognise the potential for mitigation measures to make a proposed development acceptable. Re-wording of the policy is provided.	The policy wording advises 'Development will not be permitted where this would have an unacceptable adverse effect on… 'Unacceptable adverse effect' is explained in the Glossary of Terms as 'An unacceptable harmful impact that cannot be satisfactorily mitigated.' Mitigation is explained in the Glossary of Terms as 'Measures that avoid, reduce, remediate or compensate for the negative impacts.' The amended proposed is not considered necessary.	Relying on written representations

						Conclusion: Disagree	
56.	**2897** **Marloes & St Brides Community Council**	**Chapter 4A Special Qualities Landscape** Policy 16 a)	52	Objection	We object to this wording. To some planning officers, anything new causes visual intrusion and therefore it should be prohibited. We propose, "causing visual intrusion which is unacceptable to the local community; and/or"	The policy wording advises 'Development will not be permitted where this would have an unacceptable adverse effect on… 'Unacceptable adverse effect' is explained in the Glossary of Terms as 'An unacceptable harmful impact that cannot be satisfactorily mitigated.' Mitigation is explained in the Glossary of Terms as 'Measures that avoid, reduce, remediate or compensate for the negative impacts.' The approach allows for a judgement to be made by the planning authority (as required by law) taking account of mitigation opportunities. Test 2. **Conclusion:** Disagree	Wish to be heard in English
57.	**3468** **Ms Sinclair CPRW**	**Chapter 4A Special Qualities Landscape Policy 16** as an example Paras 4.94, 4.95, 4.103	52	Clarification	It relates to supporting documents not yet produced. We welcome the promised Supplementary planning Guides and assume they will be submitted for full public consultation.	Yes public consultation will take place as set out in the Authority's Delivery Agreement for the Plan. The Authority carries out a 3 month consultation on supplementary planning guidance. **Conclusion:** Agree but no change needed.	Rely on written representations.
58.	**2897** **Marloes & St Brides Community Council**	**Chapter 4A Special Qualities Landscape** Para 4.96	53	Objection	We object to this section, because as written it does not go far enough. We propose an additional final sentence, as follows: "At the same time, the opinion of local residents must be taken into account: the landscape is theirs as much as anyone else's."	Paragraph 3.1.4 of Planning Policy Wales Edition 9 advises: When determining planning applications local planning authorities must take into account any relevant view on planning matters expressed by neighbouring occupiers, local residents and any other third parties. While the substance of local views must be considered, the duty is to decide each case on its planning merits. Test 1. This is the approach that the planning authority follows. **Conclusion:** Disagree	Wish to be heard in English
59.	**1092** **Lichfields (Agent) Bourne Leisure**	**Chapter 4A Special Qualities Landscape** Paragraph 4.99: Major/large scale development	54	Object.	Bourne Leisure considers that draft paragraph 4.99 should recognise that, whilst major or large-scale development is unlikely to be acceptable everywhere across the National Park Authority, each proposal should be assessed on its own merits, having regard to national policy. A detailed submission is provided along with suggested wording.	Planning applications must be determined in accordance with the adopted plan unless material considerations indicate otherwise (Section 38(6) of the Planning and Compulsory Purchase Act 2004). All planning decisions must be taken on the particular merits of each case within this overall context. The amendment suggested is not consistent with the above Act's requirements and the explicit policy prescriptions set out in the Local Development Plan for particular forms of development. **Conclusion:** Disagree	Relying on written representations
60.	**1569 - Welsh Government**	**Chapter 4A Special Qualities Open Space & Green Wedges** Policy 17: Green	55	Category C – objection	The number and scale of green wedges (41 in total) is excessive, especially in the context of a National Park. The evidence base does not adequately explain or justify in many cases how green wedges have been designated in line with PPW (para 4.8.3, 4.8.11).	See Main Issues of the Consultation Report for the Authority's response.	

		Wedges					
61.	**2025** **Home Builders Federation**	**Chapter 4A Special Qualities** **Open Space and Green Wedges** Policy 17 Open Space and Green Wedges	55	Objection	The supporting text should include information on what level, type and future maintenance of open space is to be provided as part of new developments. This could simply be a reference to an SPG on the subject.	Agree regarding the need to ensure the issue is addressed in the Plan. There is a cross reference to Policy 53 in Policy 17 which in turn advises regarding the need to prepare supplementary planning guidance in the reasoned justification (see paragraph 4.310). **Conclusion:** Agree but no change needed for the reasons set out above.	Rely on written representations
62.	**2910** **St Davids City Council**	**Chapter 4A Special Qualities** **Coast** Policy 19 & Policy 44:	56		Porthclais is not recognised as a harbour in any of these & therefore is not protected to sustain harbour activities. St Justinians is not recognised either. The City Council respectfully requests that the LDP is amended to include both of the harbours	There are many smaller harbours and inlets around the Pembrokeshire Coast. Whilst many still provide access to the sea, they are remote from identified Centres and development opportunities in such locations would be limited by their location. They differ from the harbours listed in Policy 19 which are within identified Centres and part of the developed coast with potential for development and redevelopment opportunities. **Conclusion:** Disagree.	Wishes to appear and speak English
63.	**1663** **Welsh Water**	**Chapter 4A Special Qualities Coast** Policy 18 Shore Based Facilities Para 4.109	56	Support	We welcome the reference to sewage treatment works under supporting text 4.109. Owing to their nature, we welcome the LPAs appreciation that sewage treatment works may be located in the undeveloped coastline.	Support noted.	
64.	**2910** **St Davids City Council**	**Chapter 4A Special Qualities** **Open Space & Green Wedges** St Davids Extend the centre boundary	58 C39		Include the green space to the east of Ysgol Dewi Sant within the Centre boundary for St Davids.	The land is the playing field and part of the sports area used in conjunction with the school and leisure centre and is shown as Open Space on the Deposit Plan Proposals Map. The County Council as landowner, education authority and leisure facilities provider has not indicated that the land is surplus to requirements. There is no merit in including this land within the Centre boundary. **Conclusion:** Disagree.	Wishes to appear and speak English
65.	**2910** **St Davids City Council**	**Chapter 4A Special Qualities** **Open Space & Green Wedges** St Davids Cathedral Close St Davids	58 C39		The Council would not like to see development encroach the Cathedral Close or land extending to the west of it.	The Cathedral Close is outside the Centre boundary for St Davids and the land is not allocated for any type of development. Whilst certain types of development may be permitted in the countryside, the Listing of many buildings and structures within the Close and the Scheduled Ancient Monument designation and the need to protect the setting would be a prime consideration should any speculative proposals come forward. The generic policies of the Plan would give protection to this sensitive area. **Conclusion:** Agree but no change is required.	Wishes to appear and speak English
66.	**2910** **St Davids City Council**	**Chapter 4A Special Qualities** **Open Space & Green Wedges** St Davids	58 C39		The Council would like to retain areas or pockets of green space between the proposed housing sites.	This is a detailed matter that would be considered at the time of a planning application being submitted to develop land. **Conclusion:** No change is required.	Wishes to appear and speak English

67.	**3511 Planning sub Committee of the Tenby Civic Society**	**Chapter 4A Special Qualities Open Space & Green Wedges Tenby** Proposals Map C41,C42 Tenby, in respect of Open Space Allocations	58 C41	Objection	A series of sites are proposed for inclusion on Tenby Inset as Open Space. A justification is provided in each case.	The Authority has assessed the sites – see 'New and Amended Sites Post Deposit' web link. **Conclusion:** Focussed Changes are proposed to add some additional sites to the Inset Maps for Tenby.	Wish to speak in English at the hearing.
68.	**2025 Home Builders Federation**	**Chapter 4B Major Development Scale of Growth** Para 4.132 a)	61	Objection	The HBF request this is reworded as the plan does include housing growth as it allocates a number of sites for new development. The HBF considers that too much emphasis is given to the fact that market housing is only being provided as an enabler to provide affordable housing.	The Authority considers that the emphasis is accurate in so far as there is no justification for providing for housing generally. Test 2. **Conclusion:** Disagree	Rely on written representations
69.	**2897 Marloes & St Brides Community Council**	**Chapter 4B Major Development Scale of Growth** Para 4.129	61	Objection	We object to this statement. The PCNPA has often stated that landscape capacity issues mean it cannot accommodate housing demand; but – • it is utterly immoral to refuse permission for development at least in line with UK population projections, because all parts of the country must "bite the bullet" and do their bit to solve the housing availability crisis; • our Community Council proved the National Park wrong about our own affordable housing development, which they fought against tooth and nail over many years on the grounds that it would be an inappropriate development. Now the homes have been built, the project has proved entirely acceptable in aesthetic terms; furthermore, the arrival of new permanent residents has proved a great boost to our community and our local economy.	The approach to housing provision is set out in the Housing Chapter. The provision provides for some growth and follows the requirements of Planning Policy Wales Edition 9 9.2.2 which asks planning authorities to consider Welsh Government projections at a more local level. Current projections would suggest that no housing is required. Test 1 and Test 2. The Community Council's views on the affordable housing exception site release on the edge of Marloes are noted. The site has been completed. **Conclusion:** Disagree	Wish to be heard in English
70.	**1616 Campaign for National Parks**	**Chapter 4B Major Development Scale of Growth** Policy 21 Appendix 1,	62		We are concerned that the LDP does not include any local interpretation of the major development test and relies on a statutory definition of major development (included in appendix 1 of the deposit LDP) which was created for a different purpose. Suggested wording is provided.	The Authority relies on the definition of 'major development' in national parks as set out in Planning Policy Wales Edition 9 November 2016 - paragraph 5.5.6. Test 1. The reference in Appendix 1 is to how major development is defined for advertisement purposes. The Authority has in previous Plans provided a local interpretation as suggested but when needing to use such a definition has not found the approach useful. Test 3. In practice the major development test in national planning policy provides for a very specific set of tests for developments which are of UK status in character. Advice is provided at the beginning of Section B of the Plan starting on page 59 of the Deposit Local Development Plan. The approach of the Local Development Plan is to provide a context for the forms and scale of development that are appropriate for this National Park and those that are not – see primarily section 'Scale of Growth' starting page 61 of the Deposit Local Development Plan. This is considered to be a sufficient policy framework. Test 2. **Conclusion:** Disagree	Rely on written representations

71.	**3457** **Friends of the Pembrokeshire Coast National Park**	**Chapter 4B Major Development Scale of Growth** Policy 21 Appendix 1	62		Include a locally interpreted major development test policy and supporting text for the National Park.	The Authority relies on the definition of 'major development' in national parks as set out in Planning Policy Wales Edition 9 November 2016 - paragraph 5.5.6. The reference in Appendix 1 is to how major development is defined for advertisement purposes. Test 1 The Authority has in previous Plans provided a local interpretation as suggested but when needing to use such a definition has not found the approach useful. Test 3. In practice the major development test in national planning policy provides for a very specific set of tests for developments which are of UK status in character. Advice is provided at the beginning of Section B of the Plan starting on page 59 of the Deposit Local Development Plan. The approach of the Local Development Plan is to provide a context for the forms and scale of development that are appropriate for this National Park and those that are not – see primarily section 'Scale of Growth' starting page 61 of the Deposit Local Development Plan. This is considered to be a sufficient policy framework. Test 2. **Conclusion:** Disagree	Rely on written representations.
72.	**2025** **Home Builders Federation**	**Chapter 4B Major Development Scale of Growth** Policy 21 Scale of Growth	62	Objection	The HBF would request that the wording to part C of the policy is amended to include 'meet the needs of the area' this is to be consistent with changes requested to earlier parts of the document.	See Officer response to representation made earlier on the objectives of the Plan. Test 2. **Conclusion:** Disagree	Rely on written representations
73.	**2708 - Pembrokeshire County Council**	**Chapter 4B Major Development Scale of Growth** Policy 21 Lack of employment allocations	62	Objection	There is a need for employment provision through allocations in PCNPA area to ensure economic growth and support local communities. **For objections only - which tests of soundness does it fail?** Test 3 **Why?** Plan will not deliver – will not ensure that sufficient employment land is brought forwards to support economic development.	The rationale for the policy framework to employment is set out in the paragraphs 4.235 to 4.241 of the Local Development Plan. See in particular paragraph 4.237. Soundness Test 3 regarding ability to deliver allocations is the main issue. **Conclusion:** Disagree	
74.	**1569 - Welsh Government**	**Chapter 4B Major Development Minerals**	63	Objection	Category C objection – The Authority will need to demonstrate how a shortfall of 3.25mt of sand and gravel will be provided across the region. A 'Statement of Common Ground' should be produced and signed by all participating authorities to ensure the shortfall has been addressed.	Since the shortfall of 2.94mt for sand and gravel up to 2033 has been identified for the south west region, within the Regional Technical Statement, an addition 3.25mt has been provided through allocations, permissions and a dormant site in neighbouring authority areas. The shortfall has therefore been addressed (see paragraph 4.135 of the Deposit Local Development Plan). A Statement of Common Ground has been produced to confirm this position. **Conclusion:** Agree - A Statement of Common Ground for the region (Pembrokeshire County Council, Ceredigion County Council, Carmarthenshire County Council and Pembrokeshire Coast National Park Authority) has been produced to confirm this position – See Appendix 2.	

75.	**1663** **Welsh Water**	**Chapter 4B Major Development** **Minerals**	63	Objection	Whilst we welcome the various references to the protection of existing surface and groundwater resources within this section of the Plan, we'd welcome similar reference to the protection of existing water and sewerage infrastructure to ensure that any minerals proposals have regard to the proximity of our infrastructure.	Applicants would need to ensure that through preparation of an application and the details of the proposal that all nearby constraints are considered. Welsh Water would also be consulted on individual applications. **Conclusion:** Disagree	
76.	**1092** **Lichfields (Agent)** **Bourne Leisure**	**Chapter 4B Major Development, Scale of Growth** **Policy 21**(f): Scale of Growth (Strategy Policy) the Potential for Growth	63	Objection	Bourne Leisure considers that as drafted, Policy 21(f) does not comply with PPW's second test of soundness ("is the plan appropriate?") as it does not reflect the nature of the evidence base as a broad starting point for the assessment of caravan and camping proposals, and the need to consider and assess the scale of each proposal on a case-by-case basis. A detailed submission is provided along with suggested re-wording of the policy text.	The criterion reflects the conclusions of the evidence base referred to in the submission (the Landscape Capacity Study for Caravan and Camping) and cross references to a more detailed Policy 42. More detailed requirements are set out in Policy 42 taking account of the scale of provision that is acceptable in various locations. **Conclusion:** Disagree	Relying on written representations
77.	**1092** **Lichfields (Agent)** **Bourne Leisure**	**Chapter 4B Major Development, Minerals** Policy 22(c): Minerals Safeguarding	65		Bourne Leisure is concerned that draft Policy 22(c) does not define the term "unacceptable adverse impacts" and considers that this draft text should be amended to state that extraction of minerals before development which would otherwise sterilise mineral resources should also only be required where this will not have unacceptable adverse impacts on amenity. A detailed submission is provided along with suggested re-wording of the policy text.	Criterion c) of the Policy advises c) without unacceptable adverse effects. 'Unacceptable adverse effect' is explained in the Glossary of Terms as 'An unacceptable harmful impact that cannot be satisfactorily mitigated.' Mitigation is explained in the Glossary of Terms as 'Measures that avoid, reduce, remediate or compensate for the negative impacts.' The amendment proposed is not considered necessary. Policy 31 Amenity would be an obvious consideration for neighbouring properties in terms of impacts. **Conclusion**: Disagree	Relying on written representations
78.	**3617** **The Coal Authority**	**Chapter 4B Major Development** **Minerals** Paragraph 4.150	70	Support	The Coal Authority is pleased to see that the Authority proposes to prepare Supplementary Planning Guidance on land instability arising from former coal mining working. We also note that the Local Plan acknowledges the requirements at National level of paragraphs 13.9.1 to 13.9.2 of Planning Policy Wales, Edition 9, November 2016 which provides a national development control policy on unstable land.	Support noted.	Rely on written representations.
79.	**1092** **Lichfields (Agent)** **Bourne Leisure**	**Chapter 4B Major Development** **Waste** Policy 28: Local Waste Management Facilities	71	Object	Bourne Leisure is concerned that draft Policy 28 only provides protection against health and safety hazards from local waste management facilities but does not protect the amenity of neighbouring uses, including holiday accommodation. A detailed submission is provided along with suggested re-wording of the policy text.	There are some generic development control policies that could be repeated in almost every policy of the plan for example, amenity, highway access, design and layout. If the Plan is read as a whole this repetition is not necessary – see paragraph 1.5 of the Local Development Plan. Where very particular issues arise from a form of development such as in this case then they warrant specific mention. **Conclusion**: Disagree	Relying on written representations
80.	**1670** **Natural Resources Wales**	**Chapter 4C Climate Change** **Climate Change, Sustainable Design, Renewable**	74	Objection	There should be a reference to The Environment (Wales) Act 2016, which puts in place the legislation needed to plan and manage Wales' natural resources in a more proactive, sustainable and joined-up way. It delivers against the programme for Government commitment to introduce new legislation for the environment. This positions Wales as a low carbon, green economy, ready to adapt to the impacts of climate	The Authority proposes a Focussed Change at the end of para 4.158 An additional sentence could read something like: "The strategy takes account of the Environment (Wales) Act 2016 and specifically the Act's provisions for resilient ecosystems and	Please accept these comments as our written representatio

		Energy, Flooding			change. The act means significant economic, social and environmental benefits for Wales. It has been carefully designed to support and complement Welsh Governments work to help secure Wales' long-term well-being, so that current and future generations benefit from a prosperous economy, a healthy and resilient environment and vibrant, cohesive communities.	sustainable management of natural resources. The principles of managing adaptively, taking account of the short, medium and long term consequences of actions, and taking action to prevent significant damage to ecosystems, in particular, apply." **Conclusion:** The Authority proposes a Focussed Change in the manner set out above.	n to be considered by the inspector
81.	**1663** **Welsh Water**	**Chapter 4C Climate Change etc**. **Sustainable Design** Policy 30 Sustainable Design (Strategy Policy)	75	Support	We are fully supportive of the requirements of this policy. A key component in a location being defined as sustainable is the provision of water and sewerage infrastructure; as such we are pleased to see the inclusion of criteria h), 'water and drainage'. We welcome the content of the supporting text 4.163 which states the intention of the policy to make more efficient use of water, and confirms that adequate sewage disposal facilities will still be required with capacity made available prior to occupation of the development.	Support noted.	
82.	**1670** **Natural Resources Wales**	**Chapter 4C Climate Change etc.** **Sustainable Design** Policy 30 Sustainable Design (strategy policy)	75	Support	We agree with the wording of the policy and supporting text.	Support noted	
83.	**1092** **Lichfields (Agent) Bourne Leisure**	**Chapter 4C Climate Change etc.** **Sustainable Design** Policy 31: Amenity	76		It is, therefore essential that the new policy includes sufficient flexibility to allow for the mitigation of adverse impacts in relation to amenity. This would help ensure that suitable and sustainable development proposals would not be prevented from coming forward where they include appropriate and achievable mitigation measures. A detailed submission is provided along with suggested re-wording of the policy text.	The proposed amendment is not considered necessary. The Policy refers to 'unacceptable adverse effects'. 'Unacceptable adverse effect' is explained in the Glossary of Terms as 'An unacceptable harmful impact that cannot be satisfactorily mitigated.' Mitigation is explained in the Glossary of Terms as 'Measures that avoid, reduce, remediate or compensate for the negative impacts.' The amended proposed is not considered necessary. **Conclusion:** Disagree	Relying on written representations
84.	**2897** **Marloes & St Brides Community Council**	**Chapter 4C Climate Change etc.** **Sustainable Design** Policy 31 Amenity Para 4.165	76	Objection	We object to condition c) because it is dangerously ambiguous: it could be interpreted as a basis for refusing any development which leads to any increase in traffic. This condition must be rewritten. We object to condition d) because plenty of experience tells us that some planning officers will use such wording to refuse nearly all development proposals on the basis of visual intrusion. We propose: "d) the development is deemed visually intrusive by the local residents."	The proposed amendment is not considered necessary. The Policy refers to 'unacceptable adverse effects'. 'Unacceptable adverse effect' is explained in the Glossary of Terms as 'An unacceptable harmful impact that cannot be satisfactorily mitigated.' Mitigation is explained in the Glossary of Terms as 'Measures that avoid, reduce, remediate or compensate for the negative impacts.' The amendment proposed is not considered necessary in relation to traffic issues. Traffic matters would also be judged against Policies 57 and 58 where the advice of the relevant Highways Authority would be integral to the Authority's decision making. In terms of visual intrusion a judgement is made by the planning	Wish to be heard in English

						authority. Paragraph 3.1.4 of Planning Policy Wales Edition 9 advises: When determining planning applications local planning authorities must take into account any relevant view on planning matters expressed by neighbouring occupiers, local residents and any other third parties. While the substance of local views must be considered, the duty is to decide each case on its planning merits. Test 1. This is the approach that the planning authority follows. **Conclusion:** Disagree	
85.	**1663** **Welsh Water**	**Chapter 4C** **Climate Change etc.** **Sustainable Design** Policy 33 Surface Water Drainage	77	Support	We welcome the inclusion of this policy as it ensures that surface water flows from new development will not communicate with the public sewerage network. We are also pleased to note under the supporting text 4.175 that there is a requirement on developers to meet the costs of adoption and provide long-term management of the sustainable drainage system.	Support noted.	
86.	**2708 - Pembrokeshire County Council**	**Chapter 4C** **Climate Change etc.** **Sustainable Design** Policy 33 Surface Water Drainage	77	Objection	We support the approach set out, however reference could be made to the implementation of SuDs Approving Bodies by WG. Welsh Government is proposing to commence Schedule 3 of the Flood and Water Management Act 2010 (FWMA) that calls for the establishment of a SuDS Approving Body (SAB) to be set up within lead local flood authorities (LLFAs). The Act requires SAB approval of all new drainage systems for new and redeveloped sites and highways to be obtained before construction can commence. It also requires that the proposed drainage system meets National Standards for Sustainable Drainage. These National Standards are concerned with the design, construction, operation and maintenance of SuDS. At present the SAB will be required to adopt and maintain the approved SuDS that serve more than one property. The SAB will be a statutory consultee to the planning process. In the case of the PCNPA LDP Pembrokeshire County Council will be the SAB. **For objections only - which tests of soundness does it fail?** Test 1 **Why?** To ensure Plan fits with the Flood and Water Management Act 2010.	The comments made are noted. It is agreed that as a commencement date for the legislation to come into force has now been agreed (7th January 2019) that an update to the Local Development Plan would be merited. It is considered appropriate to insert an additional paragraph before paragraph 4.170 of the Plan to update the mandatory SuDS requirements. **Conclusion:** The Authority proposes a Focussed Change as set out above.	
87.	**1569 - Welsh Government**	**Chapter 4C** **Climate Change** **Renewable Energy** Policy 34: Renewable Energy	81	Category C – objection	Policy 34 should be amended to refer to the different scales of renewable energy development (PPW, Figure 12.2) and make clear how the Authority would determine applications for each scale, in line with national policy (PPW, paragraph 12.8.14) and the Authority's Renewable Energy Assessment (REA). The target contribution of 49GWh should be included in the reasoned justification and reflected in the monitoring framework.	See Main Issues in the Consultation Report for the Authority's response.	
88.	**1663** **Welsh Water**	**Chapter 4C** **Climate Change etc.** **Renewable Energy** Policy 34 Renewable Energy	81	Objection	Whilst we are generally supportive of this policy, we would request that any of our infrastructure affected by a renewable energy proposal is protected accordingly.	Applicants would need to ensure that through preparation of an application that all nearby constraints are considered. Welsh Water would also be consulted on individual applications. **Conclusion:** Disagree	

89.	**2897** **Marloes & St Brides Community Council**	**Chapter 4C Climate Change etc.** **Renewable Energy** Policy 34 Para 4.181	81	Objection	Firstly, with reference to small-scale renewable energy schemes, reference should be made to the existing Welsh permitted developments which have been granted in recent years and which apply generally within the National Park. We object to "…cumulative impacts will be an important consideration." We propose "…cumulative impacts may be a consideration."	It is not considered appropriate for the Local Development Plan to refer to permitted development rights as these apply across a wide range of development proposals under the Town and Country Planning (General Permitted Development) Order 1995 (as amended) and would therefore need to be referenced across many policies for consistency. The Local Development Plan is a land use document for development that requires planning permission. The Authority is available to provide advice on whether individual proposals require planning permission or not. The existing reference to cumulative impacts within the policy is considered to be appropriate. Whilst this consideration will not always be pertinent to a specific development proposal, all developments should be screened in the first instance for potential cumulative landscape impacts. **Conclusion:** Disagree.	Wish to be heard in English
90.	**3468** **Ms Sinclair CPRW**	**Chapter 4C Climate Change etc.** **Renewable Energy** Policy 34 Renewable Energy	81	Objection	123 National Energy Foundation Update to the 'Development of a Renewable Energy Assessment and Target Information for the PCNP: Draft report -Nov 2008' Updated 12.1.2016 NEF Renewable Energy update 2016 for PCNP LDP 2016. Appendix 2. Methodology for estimating potential generation from field scale solar page 34 The methodology is needlessly complicated when its simple formula would suffice by reference to all land, rather than subdivision to each Landscape Character Area. Appendix 2 Page 34 Methodology for estimating potential generation from field scale solar	Not all land within the National Park was included when estimating potential generation from field scale solar. Only those Landscape Character Areas identified as having a low to moderate sensitivity for field scale solar, within the adopted Renewable Energy Supplementary Planning Guidance Annex 1 (Technical Update 2014). Those with only a 'Moderate-High' or 'High' landscape sensitivity across the solar scales of development were not included. It is proposed to carry this Supplementary Planning Guidance forward for the replacement Local Development Plan. This approach seeks to give a more accurate reflection of the true generational capacity potential within the National Park by following the advice contained within the existing Supplementary Planning Guidance. **Conclusion: Disagree.**	Rely on written representations.
91.	**1670** **Natural Resources Wales**	**Chapter 4C Climate Change etc.** **Flooding and Coastal Inundation**	83	Support	We are satisfied that all our previous comments have been incorporated in to the plan and we agree with the wording of policies 35 – 38	Support noted.	
92.	**1092** **Lichfields (Agent) Bourne Leisure**	**Chapter 4C Climate Change etc.** **Flooding and Coastal Inundation** Policy 36: Development in the Coastal Change Management Area	86	Support	Support for the policy outlined.	Support noted.	Relying on written representations
93.	**2708 - Pembrokeshire County Council**	**Chapter 4C Climate Change etc.** **Flooding and Coastal**	86	Support	Support the restrictive approach towards new dwellings in the Coastal Change Management Area, the evidence for which has been discussed and developed in conjunction with PCC.	Support noted.	

		Inundation Policy 36 Development in the Coastal Change Management Area					
94.	**2708 - Pembrokeshire County Council**	**Chapter 4C Climate Change etc. Flooding and Coastal Inundation** Policy 37 Relocation of Existing Permanent Dwellings affected by Coastal Change	87	Support	PCC support this innovative approach recognising the challenge responding to coastal changes presents. Consideration will be given to developing a complementary approach through PCC's LDP Review.	Support noted.	
95.	**2708 - Pembrokeshire County Council**	**Chapter 4C Climate Change etc. Flooding and Coastal Inundation** Policy 37 Relocation of Existing Permanent Dwellings affected by Coastal Change	87	Objection	Criterion f requires that the site is cleared and made safe. This does not account for the potential for long term unsightly plots which compromise special qualities within communities and the impact on remaining adjacent properties. We would suggest that there should be a requirement to return the site to its natural state. There should also be clarification on where the responsibility for maintaining such sites lies? Further explanation of 'made safe' would be helpful in relation to the security of the site, with potential for SPG to provide clarification on this detail.	Other policies in the Plan will be used to ensure that the sites of such properties remain compatible with the purposes of National Park designation. Restoring a site to a natural state may not always be appropriate, or desirable – particularly if the site can be used for temporary uses. The responsibility of maintaining such sites is a legal rather than land-use planning matter and it is not possible to know where the responsibility for the various sites likely to be affected by sea level rise will lie. Should the Authority consider further clarity on the care and after-use of sites is required this can be achieved through Supplementary Planning Guidance. **Conclusion:** Disagree with the need for change to the Plan. Further consideration can be given to the need for Supplementary Planning Guidance following adoption of the Plan.	
96.	**1092 Lichfields (Agent) Bourne Leisure**	**Chapter 4C Climate Change Flooding and Coastal Inundation** Policy 38(e): Relocation and replacement of development (other than residential) affected by coastal change	88	Object	Bourne Leisure disagrees with the proposed requirement in e). Applicants seeking approval for development under this emerging policy would be those that have no option other than to seek relocation or replacement due to coastal change. Criterion e) restricts the flexibility needed in these adverse circumstances; it would therefore serve to limit the ability of operators to relocate and continue to operate their business in the area, thereby potentially resulting in a reduction in economic benefits for the National Park. It is suggested that criterion e) be removed from the Policy.	The policy operates in a similar way to exceptional land release for affordable housing. As advised in paragraph 9.2.24 of Planning Policy Wales, such "*sites must meet all the other criteria against which a housing development would be judged."* The Local Development Plan is intended to be read as a whole and proposals are considered within the context of all relevant policies. Criterion e in this policy is included in this instance for clarification and does not change the way normal procedures would be applied. **Conclusion:** Disagree.	Relying on written representations
97.	**1092 Lichfields (Agent) Bourne Leisure**	**Chapter 4D visitor Economy** Paragraph 4.206: Traffic	90	Object	Bourne Leisure is concerned that draft paragraph 4.206 does not recognise that the proposed "more rigorous approach to assessing traffic impact" for developments that will generate visitor traffic should still be proportionate to the scale of the proposal. A detailed submission is provided along with suggested wording.	Paragraph 4.331 under Policy 58 provides further advice. A Transport Assessment will be required for proposals likely to have significant trip generation: a) Residential developments of 25 units or more: or b) 100 or more vehicle movements per day: or c) 10 freight movements per day **Conclusion:** Disagree	Relying on written representations
98.	**1092 Lichfields (Agent) Bourne Leisure**	**Chapter 4D Visitor Economy, Employment Paragraph**	90	Support	Support outlined.	Support noted.	Relying on written representations

		4.204 Supporting text in relation to “” Paragraph 4.204: Holiday accommodation					
99.	**1092 Lichfields (Agent) Bourne Leisure**	**Chapter 4D Visitor Economy etc. Policy 39**: Visitor Economy (Strategy Policy)	91	Object	Bourne Leisure considers that this statement in draft Policy 39 should allow for the consideration and assessment of development proposals to take into account any mitigation measures that are proposed to be applied. As drafted, Policy 39 does not recognise that damage to the special qualities of the National Park and adverse impacts on sites and species can often be acceptably mitigated. A detailed submission is provided along with suggested re-wording of the policy text.	Policy 8 and Policy 10 reflect the need to be compliant with the Environment Act 1995 in relation to the role of National Parks as well as the approach to be taken in relation to sites and species of European importance. The degree to which mitigation measures can be accepted varies depending on the significance of the designation being considered. **Conclusion:** Disagree	Relying on written representations
100.	**2897 Marloes & St Brides Community Council**	**Chapter 4D Visitor Economy** P91 Section 4.207 Policy 39 section (d)	91	Objection	We object to “…not appropriate for market or affordable housing provision on brownfield sites…” We propose “…not appropriate for market or affordable housing provision or Community Land Trust / Co-Housing development on brownfield sites…	The term ‘affordable housing’ is the consistently used by local planning authorities and the Welsh Government. An explanation is provided in the Glossary of Terms on page 159 of the Deposit Local Development Plan which is consistent with national planning policy and guidance. Test 1. A provider of affordable housing could include a Community Land Trust for example but the planning authority cannot prescribe who the provider should be. **Conclusion:** Disagree.	Wish to be heard in English
101.	**2897 Marloes & St Brides Community Council**	**Chapter 4D Visitor Economy** Visitor Accommodation P93 Section 4.216	93	Objection	We object MOST STRONGLY to the final sentence: “In principle all new market housing… …can contribute to meeting the need for affordable housing.” This statement is by any definition COMPLETELY UNACCEPTABLE. Despite objections from this and many other Community Councils in the National Park, the PCNPA has consistently granted planning permission for large high-specification dwellings, whether within villages or in the open countryside, which are completely out of the reach of local residents. It would only be legitimate to make the above statement if there were strict Park policies which restricted the size and nature of all new market housing.	The sentence refers to national planning policy contained in Planning Policy Wales (para 9.2.16) which details that all new market housing may contribute to meeting the need for affordable housing. In this plan (and its predecessor Plan) the Authority has sought provision of affordable housing on sites where the requirement would result in a whole unit needing to be provided. Otherwise financial contributions are sought. The contribution is calculated on the basis of the floor area of the market dwelling. Such funds are used in the delivery of affordable housing – as has been the case for the land released as an exception site for 8 affordable houses in Marloes. The application of this approach is not impacted by the size of the market dwellings approved – only that larger dwellings would normally result in higher sums being paid towards the affordable housing provision. Ensuring sustainable communities will require a range of house types and sizes overall. Whilst housing market assessments assist in providing details of the size of houses needed in the social housing sector, a restriction on the size of new market houses would not be a reasonable approach, with each application being considered on its individual merits taking account of the sustainable design policy of the Plan etc. **Conclusion:** Disagree.	Wish to be heard in English
102.	**1092 Lichfields (Agent) Bourne Leisure**	**Chapter 4D Visitor Economy, Employment Paragraph**	94	Support	Support outlined.	Support noted.	Relying on written representations

		4.221: Caravan/camping/chalet development					
103.	**1092 Lichfields (Agent) Bourne Leisure**	**Chapter 4D Paragraph 4.222**: **D Visitor Economy etc.** Proposed SPG	94	Objection	Bourne Leisure considers that it is important that any such Supplementary Planning Guidance should take into account the views of all stakeholders, including holiday accommodation providers, in order to ensure that this document reflects the pressures and opportunities faced by the industry. Bourne Leisure therefore requests that the emerging Supplementary Planning Guidance is subject to early stakeholder engagement, prior to public consultation, so that the Company has the opportunity to comment and inform the SPG.	The policy approach set out in the Plan is supported by the evidence base which is the Landscape Capacity Study for Caravan and Camping. Any fundamental issues with the evidence base should be coming through as a representation on the Plan. In terms of supplementary planning guidance preparation the Authority normally provides a 3 month consultation period on draft guidance. If a meeting would help with preparing the consultants' response that can be arranged. The approach has been for the Authority to consult representative organisations such as the Caravan and Camping Forum on the approach at a policy or supplementary planning guidance formulation stage. **Conclusion:** Consult on the draft supplementary planning guidance consultation. No change to the Local Development Plan is needed.	Relying on written representations
104.	**2708 - Pembrokeshire County Council**	**Chapter 4D Visitor Economy etc.** 4.219 Caravan, Camping and Chalet Development	94	Support	Support the use of a capacity study to inform such policies & the clarity of the different approached to different structures.	Support noted.	
105.	**1663 Welsh Water**	**Chapter 4D Visitor Economy** Policy 42 Caravan, Camping and Chalet Development	95	Objection	As with renewable energy proposals, where there is development that would affect our infrastructure, we would request that they are protected accordingly. We would also advise that sufficient capacity will need to be available should any proposal under the provision of this policy wish to establish a water supply or connect to the public sewerage network. Accordingly, hydraulic modelling assessments/developer impact assessment may be required to determine what reinforcement works are required in order to accommodate development.	Applicants would need to ensure that through preparation of an application that all nearby constraints are considered. Welsh Water would also be consulted on individual applications. **Conclusion:** Disagree	
106.	**1092 Lichfields (Agent) Bourne Leisure**	**Chapter 4D Visitor Economy etc. Policy 42**: Caravan, Camping and Chalet Development	95	Support	Support for the strategy outlined.	Support noted.	Relying on written representations
107.	**1092 Lichfields (Agent) Bourne Leisure**	**Chapter 4D Visitor Economy etc. Paragraph 4.231**: Preventing year-round occupancy	98	Object	Bourne Leisure considers that it is important that any measures to prevent year-round occupancy should not conflict with the aim of the emerging LDP to support all-year round tourism, as stated in the draft Vision. A detailed submission is provided along with suggested wording.	The two sentences in this paragraph relate to separate circumstances. Conditions used to prevent year-round occupancy are to ensure that the accommodation is not used for permanent residential occupation and is retained as holiday accommodation. Seasonal occupancy conditions are attached for specific reasons, for example where there may be a need to protect the landscape or biodiversity during certain times of the year. **Conclusion:** Disagree.	Relying on written representations

108.	**1092** **Lichfields (Agent)** **Bourne Leisure**	**Chapter 4D Visitor Economy etc.** **Policy 43**: Site Facilities on Tent, Chalet and Caravan Sites	98	Object	Bourne Leisure is concerned that draft Policy 43 does not reflect the need to maintain or improve the quality of on-site facilities in order to respond to the needs of the tourism industry and maintain visitor levels. A detailed submission is provided along with suggested wording.	The policy as written would not impact on the quality of facilities provided and balances the needs of site operators to provide the necessary appeal to their customers whilst safeguarding the wider vitality and viability of the National Park communities. **Conclusion:** Disagree.	Relying on written representations
109.	**1569 - Welsh Government**	**Chapter 4D Visitor Economy** Policy 44 & 45 Safeguarding and Reuse of Employment Sites	100	Category C – objection	Policy 44 criteria (e) and 45 conflate the issue of safeguarding employment land/premises. It should be clear as to which spatial locations the plan is seeking to retain employment uses and where, in appropriate circumstances, alternative uses may be acceptable.	The strategy for employment is for small-scale provision, with the strategic provision lying in Pembrokeshire County Council's planning area. The nature of employment within the National Park is generally characterised by small and micro businesses and by employment in the agricultural, tourism and retail sectors. Identification of sites to be retained in employment uses would be extremely difficult to identify/show on a proposals map. The approach in the Plan is to consider the re-use of these small sites where the criteria of the policy is met. **Conclusion:** Disagree.	
110.	**1663** **Welsh Water**	**Chapter 4D Visitor Economy etc.** Policy 44 Employment Sites & Live/Work Units	100	Objection	Should any employment sites and live/work units propose to connect to our infrastructure, then we may need to undertake hydraulic modelling assessments/developer impact assessment to determine what reinforcement works are required in order to accommodate development. Should the proposal wish to discharge trade effluent, then the consent of Welsh Water will be required and there may also be an element of pre-treatment necessary.	Procedural requirements noted.	
111.	**2897** **Marloes & St Brides Community Council**	**Chapter 4D Visitor Economy** P100 Section 4.240	100	Objection	We object to the following wording, which is far too restrictive: "…for new businesses needing to join existing clusters." We propose, "…for new businesses."	The proposed change of wording would not comply with national planning policy which allows only certain types of development in the countryside. The 'Employment' section of the Plan and Policy 44 fully and clearly sets out how employment proposals in the countryside will be considered. Test 1. **Conclusion:** Disagree.	Wish to be heard in English
112.	**2897** **Marloes & St Brides Community Council**	**Chapter 4D Visitor Economy** P101 Section 4.241 Policy 44 c)	100	Objection	We object to the wording, which is far too restrictive. We propose "c) Allowing extensions to established businesses and giving favourable consideration to new businesses in the countryside."	Policy 44 is drafted in line with national planning policy guidance and allows for consideration of sites in the countryside (criteria a to d). Test 1. **Conclusion:** Disagree.	Wish to be heard in English
113.	**2897** **Marloes & St Brides Community Council**	**Chapter 4D Visitor Economy** P101 Section 4.244	101		We object to the National Park definition of the term 'rural enterprises'. This definition is completely out of date, as it relates to a pre-Information-Technology era when most businesses involved physical processes, and communications were restricted to landline telephones and telexes. The National Park must revise its understanding of 'rural enterprises' to acknowledge that pretty much any enterprise which operates in the countryside these days legitimately falls within the definition.	TAN 6: 4.3.2 provides a definition of the term rural enterprises which is reflected in paragraph 4.244. Tourist related enterprises are dealt with under Policy 39 and are not reflected here. Test 1. **Conclusion:** Disagree	Wish to be heard in English
114.	**2897** **Marloes & St Brides Community Council**	**Chapter 4D Visitor Economy** P102 Section 4.245 Policy 45 final paragraph	102	Objection	We object to "…a community use or market/affordable housing provision…". We propose "…a community use or market/affordable housing/Community Land Trust/ Co-Housing provision…".	The term 'affordable housing' is the consistently used by local planning authorities and the Welsh Government. An explanation is provided in the Glossary of Terms on page 159 of the Deposit Local Development Plan which is consistent with national planning policy and guidance. A provider of affordable housing could include a Community Land Trust for example.	Wish to be heard in English

						Conclusion: Disagree.	
115.	**2708- Pembrokeshire County Council**	**Chapter 4D Visitor Economy etc.** Policy 46 Farm Diversification	103	Support	Support this positive approach to farm diversification	Support noted.	
116.	**4446 Atriarc Planning (Agent) on behalf of the Lort-Phillips Estate**	**Chapter 4D Tourist Allocation** Former Mansion site Lawrenny Site No 046	105 C17	Objection	Secondary Response to the preliminary LDP Submission dealing with compatibility with Park Purposes, Investment, Highway network and public transport, drainage, biodiversity and trees and culture and heritage.	There are two ways in which such a significant development proposal could be incorporated in the local development plan. If the proposal is sufficiently well developed, and is supported by the Local Planning Authority, then a policy supporting the development can be incorporated along with an allocation. The proposal is fleshed out to a degree but it appears to be still in development with many components still being considered. Added to that is the number of issues that need to be addressed in detail on such a sensitive site – see Candidate Site Assessment. From the planning authority's perspective any proposed development of the site is best assessed through the development management process where impacts on habitats, landscape, heritage sites, the road network etc. can be thoroughly examined through pre-application discussions etc. The policies of the Plan would be sufficient to evaluate such an application. The Plan's silence on such a proposal does not, of course, mean it would automatically be refused. It might be allowed as being within policy (depending on how it develops), or as an exception to policy because of special factors. However, it would be inappropriate for the plan to contain a specific commitment to the project where more detail is required and consequently additional assessment is needed. **Conclusion:** Disagree	
117.	**2873 Angle Community Council**	**Chapter 4D Visitor Economy Angle Candidate Site 117**	105 C2	Support	It appears this proposal has already been dismissed and this decision has or approval.	Support noted.	
118.	**2910 St Davids City Council**	**Chapter 4D Visitor Economy St Davids St Davids** EA748 - South of St Davids Assemblies -	105 C39	Object	Retain the site in the LDP but change to mixed allocation.	The site is allocated in the current Local Development Plan for employment use but no interest has been expressed in bringing it forward for development to date. Demand is for small premises rather than land. There is no evidence to support its continued allocation for this purpose. The site was submitted as a Candidate Site for housing – Candidate Site 3. The assessment concludes that development of the site for residential use, in isolation prior to the development of the neighbouring land, west of Glasfryn Road is not considered to represent a logical extension to St Davids. It is considered that the land to the west of Glasfryn Road should be prioritised for development – particularly as it now has planning permission (NP/18/0051) for 70 houses and a hotel. The City Council has not provided any supplementary evidence to challenge the overall assessment of the site.	Wishes to appear and speak English

						Conclusion: Disagree.	
119.	**2910** **St Davids City Council**	**Chapter 4D Visitor Economy** **St Davids** MA 746 - Between Glasfryn and Millard Park -	105 C39		Retain the site in LDP as mixed allocation.	Part of the site is allocated in the current Local Development Plan for live/work units use but no interest has been expressed in bringing it forward for development to date. Assessment of the site for housing concludes – Candidate Site 004- that whilst the site would be appropriate for housing development, priority should be given to developing the land west of Glasfryn Road – particularly as it now has planning permission (NP/18/0051) for 70 houses and a hotel. The City Council has not provided any supplementary evidence to challenge the overall assessment of the site. **Conclusion**: Disagree.	Wishes to appear and speak English
120.	**2910** **St Davids City Council**	**Chapter 4D Visitor Economy & Chapter 4 E Housing** **St Davids** Extend the centre boundary	105 C39		Extend the Centre boundary for St Davids between the Fishguard and Haverfordwest main road to include land to the east of Glasfryn. Allocate the land for both Housing and Employment.	See representations above regarding the allocation of land along the eastern side of Glasfryn Road. In conclusion, land to the west of Glasfryn Road should be prioritised for development – particularly as it now has planning permission (NP/18/0051) for 70 houses and a hotel. Delivery of the land allocations on the eastern side of the road have not been forthcoming to date. The inclusion of this land within the Centre boundary but without allocation would give scope for speculative development which could undermine the strategy of the Local Development Plan. National and local planning policy allows for consideration of affordable housing and employment uses within or adjacent to Centre boundaries which provides scope for such uses to come forward. The City Council has not provided any supplementary evidence to support the inclusion of the land within the boundary nor to contest the site assessments. **Conclusion:** Disagree.	Wishes to appear and speak English
121.	**2910** **St Davids City Council**	**Chapter 4D Visitor Economy 4E Housing** Housing and Employment Opportunities in **outlying areas of St Davids**	105 PM4		The Council would like see further opportunities for sites to be made available for housing and employment in the outlying areas and hamlets of St Davids and Solva such as Carnhedryn and Whitchurch.	No site-specific proposals were submitted with this comment. Any Candidate Sites submitted have been considered but those in Solva were not considered suitable for allocation, due to the lack of certainty of deliverability of the developments and/or impact on the National Park. Proposals for housing coming forward for speculative development in Solva and the smaller villages can be considered in the context of the generic policies of the Plan. National and local planning policy allows for consideration of affordable housing and employment uses within or adjacent to Centre boundaries which provides scope for such uses to come forward. **Conclusion**: No change is required.	Wishes to appear and speak English
122.	**1569 - Welsh Government**	**Chapter 4E Housing** Site Delivery and Implementation	106	Objection Category C	Infrastructure requirements, associated costs, together with timescales for delivery from the Land Implementation Study (LIS) and Housing Background Paper should be included within the plan, or appendix, to aid the implementation and monitoring of the plan.	Infrastructure requirements may change as sites are progressed and this may date the Plan quickly. A reference to the study is provided at paragraph 4.290 of the Plan. Similarly the trajectory for site development may change.	

						Paragraph 6.4.2.16 of the Local Development Plan Manual advises: 'A delivery statement, housing trajectory or equivalent should be prepared detailing the main site allocations, the planning requirements, any constraints and the means by which they can be resolved, phasing provisions, contingency status, etc. It is better to present this is as a supporting background document rather than as part of the plan so that it can be reviewed and updated.' Indicators 22 to 24 should provide a sufficient monitoring framework for housing provision. Indicator 23 could refer to the Housing Background Appendices as a guide to the level of provision expected by formal review if this would assist. **Conclusion:** A brief discussion at Examination on this matter would be welcomed. A Focussed Change is proposed where a cross reference to the relevant Housing Background Papers appendices on Housing Delivery is made in Indicator 23.	
123.	**1569 - Welsh Government**	**Chapter 4E Housing Housing Land Supply** – Inconsistencies	106	Objection	Demonstrating delivery of the strategy will be essential. The development planning system in Wales is evidence led and demonstrating how a plan is shaped by the evidence is a key requirement of an LDP examination. The Authority must ensure there is a robust evidence base to demonstrate delivery of the LDP strategy and components of housing land supply, which at present have a number of inconsistencies.	General comment noted. See responses later on specific points raised. **Conclusion:** Noted. See more detailed responses later.	
124.	**1569 Welsh Government**	**Chapter 4E Housing** **Spatial Distribution of Housing**	106	Objection - Category C	Only 205 units (18% of total housing provision) are estimated to be delivered in Tenby, solely through commitments and windfall provision. The Authority should clarify why the potential sites identified in Tenby through the Settlement Capacity Study have not been taken forward as allocations; given it is the most sustainable settlement.	Twelve sites in Tenby were identified in the Settlement Capacity Study. Four of the sites identified were not assessed further as they were already ear-marked for other developments, the landowners had already indicated that they intended to use the sites for other purposes or it was clear that access into the site would not be achievable. One of the sites identified was outside the National Park's area of planning jurisdiction. The remaining 8 sites were assessed as Candidate Sites, some of which were also submitted for consideration by the landowners themselves. The Candidate Site Assessments provide advice in detail on why these sites have not been taken forward. **Conclusion:** No change	
125.	**2708 - Pembrokeshire County Council**	**Chapter 4E Housing** 4.254 Housing Background paper para 52 Older People	106	Objection	The Plan recognises the significant growth in older age-groups remains a feature of all scenarios. It fails however to demonstrate how it intends to plan for the specific housing needs of older people. **For objections only - which tests of soundness does it fail?** Test 2 **Why?** Does not flow from the evidence or respond to this local issue (Test 2)	The issues around such provision are highlighted in the Equalities Impact Assessment for the Plan. The current housing market assessment only takes into account bedroom numbers for affordable housing requirements. It would however include any older person's affordable housing needs where applicable. There are limitations on the ability to influence the mix of housing. Beyond providing a suitable layout where a mix of dwellings normally provides for a better layout the planning authority can only seek to achieve an element of affordable housing to meet the need as shown in the Local Housing Market Assessment. The Housing Market Assessment provides numbers for overall affordable housing need. The mix (i.e., providing suitable properties for older people) comes when need is addressed for an individual project by the housing authority. Properties will also need to comply with building regulations standards. Compliance with alternative standards would need to be brought forward through Welsh Government.	

						The difficulties with the introduction of sprinkler systems illustrate the issues that arise with prescribing matters such as a lifetime homes standard. **Conclusion:** Disagree	
126.	**2025 Home Builders Federation**	**Chapter 4E Housing** Affordable Housing Study Final Report December 2016	106	Objection	The Viability report does not allow for the cost of sprinklers, recent LDP inquiries have used the WG figure of £3,100 per house. The Council proposed affordable targets do not align with those shown to be viable in the report at table 5.2 in the following housing market areas South East Coast, St David's and North Coast, South West Coast, St Brides Bay, Estuary Hinterland, North East NP or table 7.1 of the conclusion of the report. The HBF consider this makes the plan unsound as it puts at risk the delivery of the proposed new homes, this is particularly important as the delivery of private housing in this plan is seen as required to facilitate the delivery of affordable housing.	See Main Issues of the Consultation Report.	Wish to be heard in English
127.	**1569 - Welsh Government**	**Chapter 4E Housing Deliverability and Viability**	106	Objection	The demonstration of delivery and viability of all sites in the LDP is critical, in particular those sites that are integral to the delivery of the strategy and objectives. Without prejudice to the Welsh Minister's powers to intervene later in the process and to the independent examination, the Welsh Government is committed to helping Local Planning Authorities throughout the LDP process. The Deposit LDP has been considered in accordance with the tests of soundness as set out in PPW and the LDP Manual. Our representations are separated into three categories which are set out by topic area in some detail in the attached annex. Category A Objections under soundness tests; fundamental issues considered to present a significant degree of risk if not addressed prior to submission. Category B Objections under soundness tests; matters where it appears the Deposit Plan has not satisfactorily translated national policy to the local level or there are tensions within the plan. Category C Objections under soundness tests; whilst not considered being fundamental to the soundness of the LDP, there is a lack of certainty or clarity on the matters which can be usefully addressed.	General comment noted. See responses on more detailed comments in the Consultation Report.	
128.	**1569 - Welsh Government**	**Chapter 4E Housing** Delivery: Demonstrating a 5 Year Supply and Flexibility	106	Objection Category B –	The plan must contain consistent and robust information to demonstrate delivery of the housing requirement. A number of inaccuracies and inconsistencies in the housing land supply (allocations, windfalls and commitments) have been identified raising concerns over the ability to maintain a 5 year housing land supply and the level of flexibility in the plan. The level of flexibility should be sufficient to deal with unforeseen circumstances, such as the timing and deliverability of sites in the plan.	Detailed comments provided and responded to separately – see Consultation Report.	
129.	**1569 - Welsh Government**	**Chapter 4E Housing Delivery**: Demonstrating a 5 Year Supply and Flexibility	106	Objection Category B	Housing Provision/Flexibility – Policy 48 'Housing Allocations' identifies 16 site allocations to deliver 525 units. Housing Background Paper (Appendix 2) states 374 units will be delivered, resulting in a numerical difference of 151 units. Implications for the level of flexibility in the plan also need to be explained. The Authority appears to have counted units beyond the plan period in the housing provision which is inappropriate.	See Main Issues in the Consultation Report for response.	

130.	**1569 - Welsh Government**	**Chapter 4E Housing Delivery**: Demonstrating a 5 Year Supply and Flexibility	106	Objection Category B	Windfall allowance - The Authority needs to justify the 'large windfall' rate of 21p/a, including why a 40% discount has been applied in Tenby. The evidence is not clear in this respect and requires clarification. It is also unclear why some 'de-allocated' sites outside boundaries are included within the windfall rates. Sites outside settlement boundaries should not be included as windfall and should be removed.	See Main Issues in the Consultation Report for response.	
131.	**1569 - Welsh Government**	**Chapter 4E Housing Delivery:** Demonstrating a 5 Year Supply and Flexibility	106	Objection Category B	5 Year Housing Land Supply - There are inaccuracies that require amendment: - Housing land supply (Appendix 3) is mathematically incorrect as it totals the housing provision, not the requirement. The flexibility allowance is to allow for the non-delivery of sites, it will never be built out in its entirety. The land supply figures for the plan need to be recalculated to ensure a 5 year supply at adoption and throughout the plan period.- The supporting housing trajectory graph is mathematically incorrect; it does not align with the housing provision of 1,150; the graph totals 1,056. Land bank sites – it is also unclear where sites with planning permission are factored into the phasing in Appendix 3 and the graph. The Authority should confirm there is no double counting with the windfall rates on this basis.	See Main Issues in the Consultation Report for response.	
132.	**1569 - Welsh Government**	**Chapter 4E Housing Delivery:**: Demonstrating a 5 Year Supply and Flexibility	106	Objection Category B	Table 7: Future growth areas - HA5 and HA11 should be allocated in totality and included within the settlement boundary to ensure comprehensive development occurs. Only units considered to be built out within the plan period should be counted numerically towards the plan provision, consistent with other allocations. Have these sites been subject to an SA?	See Main Issues in the Consultation Report for response.	
133.	**2025 Home Builders Federation**	**Chapter 4E Housing** Para 4.258 Para 4.258 – 4.264	107	Objection	The HBF request that wording is added to reference the fact that there are other factors such as the market conditions, policy requirements at the time and the suitability and viability of allocated sites could also affect delivery.	Strategic policy has varied since 2005 (influenced by 3 different Development Plans) (start of the 10 year completion rate used in Table 3 of the Local Development Plan), the range of sites provided has changed as well. This has influenced the Delivery Rates at the time. For the future as explored in the introduction changes in approach might see some variation in completion rates. **Conclusion:** Disagree	Rely on written representations.
134.	**2025 Home Builders Federation**	**Chapter 4E Housing** Para. 4.262	108	Objection	The HBF request amended wording as the 10% contingency is not advised by WG it has just become a commonly used figure. Advise is that it should be set taking account of the specific characteristics of the area. The edge analysis document identifies a high level of vacancies linked to second homes and this could be a justification for a higher contingency rate.	Agree an amendment can be done to delete reference to Welsh Government. The role of second homes in housing provision will have already been factored in household projection work for various development rates – see paragraph 3.5 Background Paper Pembrokeshire Demographic Forecasts June 2018 by Edge Analytics. The proportion of second homes in the National Park has remained relatively constant over the years. The approach to contingency the Authority has taken is set out in Appendix 3 to the Housing Background Paper. No change to the approach is proposed. **Conclusion:** A Focussed Change is proposed as set out above.	Rely on written representations
135.	**2708 - Pembrokeshire County Council**	**Chapter 4E Housing Housing - Tenby** Paragraph 4.266	109	Object	The text records that the current provision 'is predominantly based on two sites that will remain as allocations in LDP 1 until replaced by LDP 2'. It adds that 'the assumption is that such an action will provide the impetus to bring these sites forward' and that 'the owners have advised of their intention to bring the sites forward'. Relying on de-allocated sites to deliver Housing for Tenby is not a sound approach and will not ensure Housing Delivery. This omission means that the Key Tier 2 Settlement	See Consultation Report Main Issues for response.	Speak – English regarding Brynhir and the Authority's affordable

					in the National Park's area has no housing allocations identified within it and raises questions over whether the Plan can deliver the housing (and therefore affordable housing) it identifies as being key to support its communities. **For objections only - which tests of soundness does it fail?** Test 2 and Test 3 **Why?** The suggestion that housing delivery will be achieved by de-allocation is not a sound approach. It does not respond to the key issues and is not logical (Test 2). The Plan is not likely to deliver sufficient housing to meet its aspirations to support affordable housing and its overall housing policy is unlikely to be successfully implemented without Housing Allocations in Tenby (Test 3). **New Site Proposed:** Yes (see below comment)		housing targets.
136.	**2897** **Marloes & St Brides Community Council**	**Chapter 4E Housing** P110 Section 4.272 final bullet point	110	Objection	We object to this argument, which is consistently overstated and overused by the PCNPA; also, it does not balance the purely aesthetic consideration of perceived landscape impact against the clear community and national well-being benefits of increased permanent population having a better mix of ages and a healthier balance of wealth levels.	It would be inappropriate for the Authority not to consider impacts on the National Park given its legal status. Test 1 and Test 2. The methodology is set out in the Candidate Site Assessment Methodology. No detail is provided on what particular conclusion the Authority has reached on the sites assessed that is disagreed with. **Conclusion:** Disagree	Wish to be heard in English
137.	**2025** **Home Builders Federation**	**Chapter 4E Housing** Para. 4.281	111	Objection	Section C - The HBF question why only a discount of 25%, how does this relate to the level of housing shown with the five year land supply in the JHLAS. Using the 2016 JHLAS there are 343 units in Cat1/2 and 595 units in Cat4 which works out at a 57% non-delivery rate. Section E - The HBF objects to the level of windfalls with small and large equalling 450 units which is 39% of housing provision, this is consider to be an overreliance on which both an unknown and also something which is not an everlasting supply. Historic higher levels of windfalls should not be a reason to continue this as this in fact shows that the limited resource is being used up. The HBF notes that Table 8 identifies a number of windfall sites three of which are described as having deliverability issues. This supports HBF's concerns about the plans overreliance on windfall sites.	See Consultation Report Main Issues for response .	Rely on written representations.
138.	**1663** **Welsh Water**	**Chapter 4E Housing** Policy 47 Housing (Strategy Policy)	113	Support	Based on the early engagement between Welsh Water and the LPA, we are confident that there are no insurmountable constraints to delivering the housing provision of 1,150 units. Where there is development that would result in our infrastructure reaching capacity, a combination of developer contributions and our own Capital Investment should ensure the sites can be delivered, though an element of phasing may need to be introduced to enable the site to come forward.	Support noted.	
139.	**2025** **Home Builders Federation**	**Chapter 4E Housing** Policy 47 Housing (Strategy Policy)	113	Objection	The contingency/ flexibility level appears to calculate at 16% this should be clarified as elsewhere in the document a figure of 10% is used. The HBF questions the need for and the benefit of Table 7 and 8 and suggests that they should be an appendix instead.	See Main Issues in the Consultation Report for response.	Rely on written representations
140.	**2906** **Saundersfoot Community Council**	**Chapter 4E Housing** **Saundersfoot** HA4-Sandy Hill HA5-Whitlow HA6-Penny Farm P153 and P154 Table 7 Housing Allocations	113 C35	Objection	Detailed comments regarding narrow roads and problematic junctions, limited school spaces, health care capacity. Alternative sites should be considered. Saundersfoot Community Council would request that Pembrokeshire Coast National Park Authority recognises the importance of affordable homes remaining affordable homes in perpetuity.	Please see Main Issues in the Consultation Report for a response to the issues raised in this representation.	Wish to speak at Examination

141.	**3182 Ms Gammon on behalf of the Jameston Campaign**	**Chapter 4E Housing Jameston** Policy 48 Allocation HA10 Opposite Bush Terrace Inset C19	113 C16	Objection	Referencing also a number of paragraphs and policies in the Local Development Plan and supporting information. The representation details how the sustainability appraisal and the candidate site assessment for the site are considered to be unsound. The representation asks for certain safeguards to be put in place if the Inspector is minded to agree with the site's inclusion.	A planning application has been submitted to develop this site for residential use which will be considered against the context of the current Local Development Plan (up to 2021). The land is allocated for residential development in the current Plan. There are several points to address in this representation: Grades 1, 2 and 3a agricultural land can be developed if there is an over-riding need or where lower grade land has an environmental value recognised by a designation. The Authority has a need to identify land appropriate for residential development for allocation in the Plan. All land considered by the Authority is within the National Park and therefore recognised by a designation. This site at Jameston has been assessed and be found to be appropriate for development to meet identified housing requirements. Other sites in Jameston which were considered through the Candidate Site process were not found to be appropriate for development due to impact on the special qualities and landscape of the National Park. The housing need within the National Park is detailed within the Housing Background Paper. Site HA436 was allocated in the current adopted Local Development Plan and has been built out. Site HA848 (not HA843 as stated in the representation) has planning permission for 23 affordable houses. This is due to be built out within the next few years. The housing need identified for the replacement Plan takes these two sites (and all others) fully into account. There remains a need for additional affordable housing and for market housing to cross-subsidise its provision. Most of the development in Jameston referred to took place in the 1970s and 1980s. The Authority has worked closely with Pembrokeshire County Council through the replacement Plan process. Each Authority is required to have a 5-year housing land supply and provide for Affordable Housing Needs within its own area. The Authority's categorisation of settlements is compatible with that set out in Pembrokeshire County Council's Local Development Plan. It would be inappropriate to direct all new housing to the larger towns outside the National Park. Development in smaller Centres, such as Jameston is at a scale which aims to meet the needs of the local population. The proposed development of 38 houses on site HA10 (formerly HA730) will accommodate 32 persons in the affordable houses (figure taken from detailed plans of houses types/sizes presented at the pre-application consultation) and 57.24 persons in the market housing (based on average house sizes, as set out in the Edge Analytics Demographic Forecasts Report 2018). This totals 89.24 persons. Site MA895 at Manorbier Station, allocated in the current adopted Local Development Plan has not been re-allocated in the Replacement Plan. The Centre boundary for Manorbier Station has also been redrawn in the Replacement Plan to exclude that site.	Wish to speak in English at the hearing.

						Site HA848 at Manorbier Station has planning permission for 23 affordable houses. Site HA821 has planning permission for 6 dwellings. The current Plan indicates land to the west of site HA10 as being considered as being suitable for development beyond the Plan period (post 2021) but this has not been repeated in the Replacement Plan. Jameston has been designated as a Rural Centre in the Replacement Plan, by virtue of the facilities and services available within the village (see scale and location of growth background paper). It is also on the route of a regular bus service operating between Pembroke Dock and Tenby. Taking Pembrokeshire as a whole, this level of bus service is good and sufficient to provide a realistic alternative to car travel for those wishing or needing to use it for day-to-day requirements. It is acknowledged that there is a public right of way crossing the site. If at all possible the route of the footpath will be protected in situ. If this is not achievable then the route can be altered by means of a footpath diversion order. There are several comments relating to a pre-application consultation undertaken by the landowners prior to submission of a planning application. They relate to layout details and are not relevant to the allocation of the land. The land was allocated in the current adopted Local Development Plan for 35 houses. Forecasts of the delivery of the site and phasing were shown in the Plan. No development has taken place to date but pre-application enquiries and public consultation has been undertaken by the landowner. The site was reassessed as a Candidate Site and it was concluded that it remains appropriate for housing development. Dwr Cymru/Welsh Water has been consulted about the allocation of the site in the Replacement Plan and has advised that there are no capacity constraints (January 2017). The Asidohl undertaken by the Authority for the site in 2008 concluded a moderate impact on the Historic Landscape and this was considered to be acceptable by the assessor. The land is within a limestone safeguarding area but development of the site would not cause additional sterilisation due to its proximity to the Centre of Jameston. Health care provision is not an issue specific to this site nor to Jameston and is a pan-Pembrokeshire issue. Most people in Pembrokeshire own a car and it would be reasonable to accept that residents of houses built at this site would be likely to do so. The availability of the services and facilities locally and the regular bus services offer an alternative means of transport. The site is immediately adjacent to the village. The development of the land will require lighting but will be required to be suitable for its purpose. Species and their habitats protected by statute will be fully	

						considered through the planning application process. The contaminated land within 50m of the site relates to the former petrol station on the A4139 opposite Orchard Cottage. The Coal Authority has not advised of any historic mining at this site. The presence of potential unrecorded coal workings at shallow depth would not preclude development of the site. The site is not within the high or low risk areas for coal workings. Dyfed Archaeological Trust has been consulted on the Deposit Plan and raised no issues relating to this site. As the site is situated within a Historic Landscape the Trust will be consulted as part of the planning application process and any permission granted would be conditioned to take into account any requirements they may have regarding archaeological interests. The land is Grade 3a and a focussed change is needed to identify it as such in Table 7 of the Plan. Paragraph 4.288 of the Plan advises how such sites will be considered. **Conclusion:** Include a focussed change as set out above.	
142.	**3576 – Mrs Tooth**	**Chapter 4E Housing Saundersfoot Policy 48 Housing Allocations HA5 (Candidate Site 031 North of Whitlow)**	113 C35	Strongly Object	Grounds of objection include impacts on the country road entrance to Saundersfoot, the access is considered to be dangerous, the impact on the National Park landscape, impact on wildlife and woodland, adverse impact on Sandersfoot's amenities, congestion issues with parking, the capacity of the school, the surgery does not have the capacity. Concerns regarding impact on the amenity of this nearby resident and impact on her property's value and are also outlined. There has been minimal change since the last development was proposed in 2008. **Change:** Remove from the Plan	Please see Main Issues section of the Consultation Report for a response to the issues raised in this representation.	Not advised
143.	**3607 - Mrs Baker**	**Chapter 4E Housing Saundersfoot Policy 48 Housing Allocations HA5 (Candidate Site 031 North of Whitlow)**	113 C35	Most strongly object	Grounds of objection include adverse impact on Sandersfoot's amenities, congestion issues with parking, the capacity of the school, the impact on the National Park landscape, wildlife and woodland and this entrance to Saundersfoot. The access is considered to be dangerous, the surgery does not have the capacity. Concerns regarding impact on the amenity of this nearby resident and impact on her property's value and are also outlined. **Change:** Exclude North of Whitlow Allocation HA5.	Please see Main Issues in the Consultation Report for a response to the issues raised in this representation.	Not advised
144.	**4601 – Miss Irwin**	**Chapter 4E Housing Saundersfoot Policy 48 Housing Allocations HA5 (Candidate Site**	113 C35	Strongly object.	Grounds of objection are adverse impact on amenities, such as the doctor's surgeries, parking (especially at the height of the season). Construction time will cause disruption and noise. **Change:** Assume it is to exclude North of Whitlow Allocation HA5.	Please see Main Issues in the Consultation Report for a response to the issues raised in this representation.	Not advised

		031 North of Whitlow)					
145.	**4603 – Mr & Mrs Fowkes**	**Chapter 4E Housing Saundersfoot Policy 48 Housing Allocations HA5** **(Candidate Site 031 North of Whitlow)**	113 C35	Object	Grounds of objection include access and road safety, egress, demand on the waste water system and on the school and the health service. Will affordable housing be provided? The commentator has personal experience of near misses in the vicinity of the site. The identity of Saundersfoot as 'a village' needs to be retained. **Change:** Don't allow North of Whitlow Allocation HA5 to go through.	Please see Main Issues in the Consultation Report for a response to the issues raised in this representation.	Not advised
146.	**4604 – Mr Tooth**	**Chapter 4E Housing Saundersfoot Policy 48 Housing Allocations HA5** **(Candidate Site 031 North of Whitlow)**	113 C35	Strongly object	Objection includes erosion of the National Park, set a precedent for future development, the creation of urban sprawl, erosion of tranquillity and beauty for all. Local amenities are under pressure and access is not safe. It is the only country road leading into Saundersfoot. **Change:** Remove from the Plan.	Please see Main Issues in the Consultation Report for a response to the issues raised in this representation.	Not advised
147.	**4610 – Ms Littlewood**	**Chapter 4E Housing Saundersfoot** C35 Saundersfoot H4 H5 H6	113 C35	Objection	Although not objecting to further housing in principle further consideration of the impacts on the environment, community, public safety, car parking and infrastructure (schools, roads, medical care etc) on this village is needed. There are issues with car parking, and walking is not popular. A large proportion of the housing will not be for local people in need or for those wishing to downsize. 1 or 2 bed detached or semi-detached bungalows or dormer bungalows perhaps. Nor should proposed new houses be sold as second homes as this has adverse impacts on village vitality and house prices. **Change:** Perhaps a covenant on the prevention of this (see representation) could be the answer?	Please see Main Issues in the Consultation Report for a response to the issues raised in this representation.	Not advised
148.	**4614 - Mr & Mrs Phillips**	**Chapter 4E Housing Saundersfoot** Policy 48 Housing Allocations – 3 sites in Saundersfoot	113 C35	Objection	The village cannot absorb further growth. It is difficult to get a doctor's appointment and the car parking is difficult. Roads are narrow (vehicle restrictions apply) and there is little free parking. The sewage system is overloaded with some new properties needing to build cess pits. The school does not have the capacity and new properties are purchased as second homes. Affordable properties to the rear of the Cambrian have not been built and potentially empty properties on the Coedrath Estate. Could housing be built where land is cheaper and this would help the local economy? There are also 8 big caravan sites in the vicinity adding to the congestion. As properties are for sale and rent is there a need for further housing?	Please see Main Issues in the Consultation Report for a response to the issues raised in this representation.	Not advised

					Detailed comments are provided on the issues regarding land to the North of Whitlow in terms of congestion issues. Also referred to is potential subsidence, the footpath and wildlife.		
149.	**4615 – Mr & Mrs Fairhirst**	**Chapter 4E Housing Saundersfoot** Policy 48 Housing Allocations – Sandy Hill Penny Farm Whitlow/Castle View Saundersfoot	113 C35	Objection	Objection to: 1. Sandy Hill 68 homes 2. Penny farm 48 homes 3. Whitlow/Castle View eventually 175 homes Representation refers to: Saundersfoot as a village being unable to absorb this development, losing its character, parking issues particularly in the summer, difficulties in with driving out of the junction of Sandy Hill Rd and St Brides (the objector lives on Sandy Hill Rd), lack of capacity at the doctors (appointments and car parking). Driving to the school is dangerous. Tourists will not wish to visit as the road coming from St Brides and Station Rd won't be able to cope with the traffic. The value of property likely to decline. Existing property is not being sold **Change sought:** Address holiday homes. Small two bed affordable homes on small plots of Land are needed which are protected from becoming holiday homes.	Please see Main Issues in the Consultation Report for a response to the issues raised in this representation.	Not advised.
150.	**4637 Mr Pike**	**Chapter 4E Housing Saundersfoot** Site 031/031A North of Whitlow and Castle View Saundersfoot	113 C35	Objection	The scheme is inappropriate to the nature and character Saundersfoot. Furthermore it will put local support services, schools and doctors under further stress when already the resources are insufficient for existing needs. The development will also give rise to further congestion and overload on rural roads whilst not providing benefit to the local community.	Please see Main Issues in the Consultation Report for a response to the issues raised in this representation.	
151.	**4643 Mrs E Hancock**	**Chapter 4E Housing Saundersfoot LDP HA04/HA05/HA06 (Sites 031 & 031A)**	113 C35	Objection	Comments include impact on the countryside, the community services which are under strain, the village appeal of Saundersfoot. Of particular concern is impact on the school. Also referred to is concern over the occupancy of the houses, impact on the doctors surgery parking and roads, wildlife and countryside, lack of safe access to the train station, rejection of the site in the past and lack of employment opportunities. The development of Brynhir, Tenby is supported.	Please see Main Issues in the Consultation Report for a response to the issues raised in this representation.	
152.	**4654 Mrs K Cox**	**Chapter 4E Housing Saundersfoot** LDPHA04/HA05/HA06 (Sites 031 & 031A)	113 C35	Objection	Objection to the proposed development of these sites. Reference is made to the detrimental impact on the countryside, wildlife, the strain on local services (including the school, the doctor's surgery, and infrastructure (including parking and the roads, and poor access to the train station) impact on the village, questions regarding affordable housing being retained and lack of employment opportunity. The site at Brynhir Tenby is preferred.	Please see Main Issues in the Consultation Report for a response to the issues raised in this representation.	
153.	**4655 Mr T Cox**	**Chapter 4E Housing Saundersfoot** LDPHA04/HA05/HA06 (Sites 031 & 031A)	113 C35	Objection	Objection to the proposed development of these sites. Reference is made to the detrimental impact on the countryside, wildlife, the strain on local services (including the school, the doctor's surgery, and infrastructure (including parking and the roads, and poor access to the train station) impact on the village, questions regarding affordable housing being retained and lack of employment opportunity. The site at Brynhir Tenby is preferred.	Please see Main Issues in the Consultation Report for a response to the issues raised in this representation.	

154.	**2916** **Tenby Town Council**	**Chapter 4E Housing Tenby** Policy 48 Add Brynhir in Tenby to the list of housing allocations	113 C41	Objection	Tenby Town Council reiterate their objection to the de-allocation and exclusion of the Brynhir site from the Tenby settlement boundary and from the Housing Allocations table in Policy 48.	Please see Main Issues in the Consultation Report for a response to the issues raised in this representation.	
155.	**2708 - Pembrokeshire County Council**	**Chapter 4E Housing** Policy 48 Housing Allocations	113	Objection	Looking at the broad picture, there are no housing allocations in the largest NP settlement, Tenby – almost certainly the most sustainable location in the NP for new development. **For objections only - which tests of soundness does it fail?** Test 2 **Why?** Does not flow from the strategy - not coherent or logical (Test 2) **New Site Proposed:** Yes (see below comment)	Please see Main Issues in the Consultation Report for a response to the issues raised in this representation.	Speak – English regarding Brynhir and the Authority's affordable housing targets.
156.	**2708 - Pembrokeshire County Council**	**Chapter 4E Housing** Policy 48 Housing Allocations	113	Objection	PCNPA has failed to achieve a 5 year land supply throughout the entire last plan period, the lack of a housing allocation in the PCNPA largest and most sustainable settlement will not address this issue. **For objections only - which tests of soundness does it fail?** Test 3 **Why?** Without Housing Allocations in Tenby, the overall deliverability of the Plan and its potential to provide a realistic housing supply is questionable. **New Site Proposed:** Yes (see below comment)	Please see Main Issues in the Consultation Report for a response to the issues raised in this representation.	Speak – English regarding Brynhir and the Authority's affordable housing targets.
157.	**2708 - Pembrokeshire County Council**	**Chapter 4E Housing** Policy 48 Housing Allocations CS 112, **Brynhir Tenby**	113 C41	Objection	PCC object to the de-allocation and exclusion of the Brynhir site from the Tenby settlement boundary and from the Housing Allocations table in Policy 48. Historically this site had not been brought forward by PCC due to the level of affordable housing required on the site. The site was formally declared surplus in 2015 and we have been having active discussions with interested parties, however, terms to date have not been agreed. We consider that this site should be included as an allocation in order to ensure its deliverability longer term, should planning permission take longer to establish than anticipated and because of the large number of units that this site will deliver. Cooke and Arkwright are instructed to market the property and all interested parties will be submitting their best and final offers this month (May), with a view to identifying a preferred developer by July 2018 (report to be taken to Cabinet 2nd July 2018), with them entering into a conditional contract (subject to Planning) during 2018/19, with submission of a detailed planning application to PCNPA in 2019/20 (condition to be included in conditional contract on timescales). However, we are also, exploring other ways of delivering the site if we are unable to agree terms with a third party, such as developing the site ourselves (by our Housing department funded by the Housing Revenue Account) or in partnership with a Registered Social Landlord. We would look to submit an application to PCNPA in 2019 (even if this was outline). **For objections only - which tests of soundness does it fail?** Test 3 **Why?** The housing supply for the Plan in Tenby will not be deliverable without the Brynhir allocation. To ensure certainty of delivery this site should be reinstated as a Housing Allocation. **New Site Proposed** Yes (see attached map)	Please see Main Issues in the Consultation Report for a response to the issues raised in this representation.	Speak – English regarding Brynhir and the Authority's affordable housing targets.
158.	**1663** **Welsh Water**	**Chapter 4E Housing** Policy 48 Housing Allocations -	113	Support	As previously discussed, early engagement between Welsh Water and the LPA has helped inform the site selection and as such we're pleased to note that infrastructure (including water supply, drainage and sewage capacities) is included in the main selection criteria list. Please see Appendix 1 of the representation for a full list of our	Support noted.	

					comment.		
159.	**2897** **Marloes & St Brides Community Council**	**Chapter 4E Housing** P115 Section 4.285 second bullet point	114	Objection	We object to the wording, which is too restrictive. We propose, "Acceptability in terms of location: Development in the countryside is strictly controlled. Residential development, in particular which is remote from Centres (listed in policies 2 to 5 and 6) is unlikely to be carried forward where not supported by the local community."	The suggested amendment would not be in keeping with national planning policy. Consultation with communities forms part of the Local Development Plan process. **Conclusion:** No Change.	Wish to be heard in English
160.	**3468** **Pembrokeshire 3468 CPRW**	**Chapter 4E Housing** Policy 48 and as an example site 022 But also sites 015,031A,037, 021A/099A, 039/041, 086A,014A, 106, 050, 045 Paragraph 4.288 and table 7, pages 115-118 HA10 for 022	114	Objection	The best and most verstile agricultural land on the new Predictive Agricultural land Quality maps, should be retained for food production – as arable land for vegetable, fruit growing and corn. Too many sites that this Review allocated for housing come into this High Grade category. Once built upon, this land will never be available to produce food. Even if eventually returned to agriculture, it will be at a much lower grade. So once built on it is removed from food production for all time. Jameston site 022. Site 022 in Jameston is shown as Agricultural land Quality 3a on the Predictive map (evidence, a copy of the map and key submitted by Mrs Davina Gammon who lives in Jameston).it is not reflected in this review.	Grades 1, 2 and 3a agricultural land can be developed if there is an over-riding need or where lower grade land has an environmental value recognised by a designation. The Authority has a need to identify land appropriate for residential development for allocation in the Plan. All land considered by the Authority is within the National Park and therefore recognised by a designation. This site at Jameston has been assessed and be found to be appropriate for development to meet identified housing requirements. Other sites in Jameston which were considered through the Candidate Site process were not found to be appropriate for development due to impact on the special qualities and landscape of the National Park. Table 7 Housing Allocations – Requirements could usefully include the symbol recognising that the site has had an assessment regarding agricultural land classification. Conclusion: Propose a focussed change to include a symbol to indicate that HA10 has had an assessment regarding agricultural land classification.	Appearance and to speak in English.
161.	**2897** **Marloes & St Brides Community Council**	**Chapter 4E Housing** P115 Section 4.285 sixth bullet point	115	Objection	Objection: along with many other Community Councils in the park, Marloes & St Brides Community Council objects, and always will object, to the Park using arguments about the availability of public transport to determine the acceptability or otherwise of a proposed new development. The availability of public transport other than rail is a bogus consideration because at any time, with next to no notice, bus services can be either scrapped or re-routed. The provision of public transport within the Park has never been very good in the past, and it is pure fantasy to assume that the situation will improve in the near or medium future. The crucial point is, residents understand this situation and they plan their lives accordingly. Furthermore, developments in hybrid and electric cars together with innovations in domestic renewable energy generation and on-site storage mean that the perceptions of what is and what isn't sustainable transport are shifting rapidly.	The criteria being used are in relation to deciding on where the majority of development (allocations) should go and national planning policy asks planning authorities to seek to direct development to more sustainable locations. **Conclusion:** Disagree.	Wish to be heard in English
162.	**1663** **Welsh Water**	**Chapter 4E Housing** Table 7 Housing Allocations - Requirements	116	Comment	As you will appreciate, our infrastructure does not 'stand still' and as such the requirements of development with regard to water and sewerage infrastructure can change over the life of the LDP. As such, we will continue to liaise closely with the LPA and update our comments accordingly throughout the process, including in the production of a Statement of Common Ground at the Examination stage.	Noted. Officers are agreeing a Statement of Common Ground prior to Submission.	
163.	**4556** **Ms Williams**	**Chapter 4E Housing Lawrenny** Candidate Site 045 Lawrenny Home Farm	119 C17	Object	Reference is made to the Candidate Site Assessment 045. PDF Document 18/04/06 Lawrenny. Sustainability Appraisal Site 045 Part of Lawrenny Home Farm Lawrenny Comments relate to the lack of availability of public transport, the range of services available locally, the capacity of local infrastructure, the ability of the site to deliver affordable houses. The link made to the moving of agricultural buildings is tenuous as this is already underway.	It is acknowledged that the assessment of this site concludes that it would not be viable to provide affordable housing at this site given the type and level of development of market housing proposed. The inclusion of the site in table 8 of the Local Development Plan as a possible windfall development is in acknowledgement that the landowner has been in discussion with the Authority regarding the site. The landowner has submitted a planning application to the	Rely on written representations.

		Section 2 and 7 of the Local Development Plan Paragraph 4.289 – Table 8 C 17 Lawrenny				Authority (October 2018) for a mix of market and affordable housing. This will be considered against the policies and proposals of the current adopted Local Development Plan, within which the site is allocated for residential development. Whilst the village does not have any public transport provision, it does have some facilities and additional residents within the village would help to sustain these facilities. Due to the availability of these facilities, Lawrenny remains identified as a Rural Centre in the Replacement Plan and the site is within the Centre of the village. The non-allocation of the site does not preclude it from being presented as a speculative application for development. In such a case it would be considered against the generic policies of the Replacement Plan. The comment on the sustainability appraisal relating to the farm buildings relates to the viability of the farm and not the development of housing. The application for the relocation of the farm buildings to a site outside the village (granted and now being built) detailed improved farm viability as part of the justification for the move. The comment relating to car travel considers a proposed development in the village which is within walking distance of the facilities available there. It is acknowledged that all new development is likely to attract additional traffic – wherever it is located. **Conclusion:** Disagree.	
164.	**4432** **Mr Oates**	**Chapter 4E Housing Lawrenny** Candidate Site 45 Inset C17 Lawrenny Paragraph 4.289 – Table 8 of the Deposit Plan	119 C17	Objection	Objection to the designation of the site 'Land at Home Farm' as a potential windfall site for housing. The Candidate Site Assessment and the Sustainability Appraisal does not support the sites inclusion and it is also contrary to draft Planning Policy Wales Edition 10 by increasing the use of the private car in areas that are not well served by public transport – reference paragraph 2.83. The Candidate Site Assessment refers to lack of viability for affordable housing provision and the site not being served by public transport. The site is a greenfield site. Its development is wholly out of scale with the village. Its development would have harmful effects on the special character of Lawrenny. Issue is raised with how the sustainability appraisal comments and classifies the relocation of the farm buildings and subsequent development of the site.	It is acknowledged that the assessment of this site concludes that it would not be viable to provide affordable housing at this site given the type and level of development of market housing proposed. The inclusion of the site in table 8 of the Local Development Plan as a possible windfall development is in acknowledgement that the landowner has been in discussion with the Authority regarding the site. The landowner has submitted a planning application to the Authority (October 2018) for a mix of market and affordable housing. This will be considered against the policies and proposals of the current adopted Local Development Plan, within which the site is allocated for residential development. Whilst the village does not have any public transport provision, it does have some facilities and additional residents within the village would help to sustain these facilities. Due to the availability of these facilities, Lawrenny remains identified as a Rural Centre in the Replacement Plan and the site is within the Centre of the village. The non-allocation of the site does not preclude it from being presented as a speculative application for development. In such a case it would be considered against the generic policies of the Replacement Plan. The comment on the sustainability appraisal relating to the farm buildings relates to the viability of the farm and not the development of housing. The application for the relocation of the farm buildings to a site outside the village (granted and now being built) detailed improved farm viability as part of the justification for the move. The comment relating to car travel considers a proposed development in the village which is within walking distance of the facilities available there. It is acknowledged that all new development is likely to attract additional traffic – wherever it is	Rely on written representations.

						located. **Conclusion:** Disagree.	
165.	**1663** **Welsh Water**	**Chapter 4E** **Housing** Table 8 Potential Large Windfall Sites	119	Comment	Given that these sites are not allocations and there are no redline boundaries, these comments are subject to change dependant on the number of units proposed: - Land to the Rear/West of Spring Hill, Dinas Cross – offsite sewers and offsite water mains will likely be required in order to connect to the respective networks, and there are currently no issues in Dinas Cross Wastewater Treatment Works (WwTW) accommodating the foul-only flows from the site; - Adjacent to Home Farm, Lawrenny – there is no public sewerage network within this settlement. There are no issues in providing a supply of clean water to the site. - Bank House, Solva – there are no issues in providing a supply of clean water to the site, nor with the public sewerage network accommodating the site. However, Solva WwTW is currently at capacity therefore the developer will need to fund a Developer Impact Assessment to assess the impact on the WwTW, and fund any subsequent reinforcement works, should they wish to bring the site forward in advance of our future Regulatory Investment. Under supporting text 4.290, we note reference to our Capital Investment Programme. To give a brief overview, our investment operates in five-yearly cycles known as Asset Management Plans (AMP). The current AMP6 extends from 1st April 2015 – 31st March 2020, with AMP7 following this and so on. We look to LDPs to help guide us to where investment is required, and as such will continue to liaise closely with the LPA as the LDP progresses.	Comments noted.	
166.	**2708 - Pembrokeshire County Council**	**Chapter 4E** **Housing** Affordable Housing (Strategy Policy) Policy 49	120	Objection	PCC notes that the affordable housing percentages set out in Policy 49 are higher than for the PCC Plan area, including for split settlements. Whilst we recognise that house prices are frequently higher in the National Park, particularly in locations with sea views, the disparity in targets for some settlements and areas appears significant. In the case of Crymych, PCC's LDP has a target of 0-5%, whereas the PCNPA plan is proposing a 20% target for Crymych and the North East settlements. We understand that the targets have been based on the viability assessment undertaken but consider that it may be worth exploring in detail why there is such a difference. Having looked at the viability assessment, PCC consider that the following elements may require consideration: whether the cost of sprinklers is realistic – a figure of £1750 is used, our recent experience of local sites indicates a cost of £4k is more realistic; whether land values identified are perhaps too high in the case of Tenby and Crymych and the wider North Area; whether the Build Costs used pick up on the fact that smaller sites often cost more to deliver and builders working in the national park are less likely to have the same economies of scale as national housebuilders and whether some element of exceptional cost should be factored into the viability assessment. One potential result of Brexit may be to create a shortage of skilled labour, with potential implications for build costs. **For objections only - which tests of soundness does it fail?** Test 2 **Why?** Not based on sound evidence.	See Main Issues Consultation Report for the Authority's response.	Speak – English regarding Brynhir and the Authority's affordable housing targets.
167.	**1569 - Welsh Government**	**Chapter 4E** **Housing** **Delivery:** Policy 49 - Affordable Housing Viability	120	Category B – objection	There are inconsistencies between the high level and site specific viability assessment which need clarification: □ The Affordable Housing Viability Study (AHVS) has not included the impact of 'sprinklers' at £3,100 per dwelling. Whist there is an element of 'headroom' above benchmark land values (BLV); it is unclear if this is sufficient to absorb sprinkler costs. It is also unclear whether the site specific work has included these costs.	See Main Issues Consultation Report for the Authority's response.	

					For those sites where 'abnormals' have been identified and have not been tested by the Arcadis Land Implementation Study (LIS) focusing on a more detailed approach, clarity is required to ensure that the viability level set in policy can be delivered.		
168.	**1569 - Welsh Government**	**Chapter 4E Housing Delivery:** Policy 49: Clarify of Affordable Housing Target	120	Objection- Category C	The policy needs to identify the affordable housing target (250 – Policy 49 - or 273 – Table 6?) with specific targets for each sub area. In addition, to align with case law and PPW (paragraph 9.2.19) the policy must include an element of flexibility /viability and include reference to negotiation on a site by sites basis.	See Main Issues Consultation Report for the Authority's response.	
169.	**2897 Marloes & St Brides Community Council**	**Chapter 4E Housing** P120 Section 4.290 Policy 49	120	Objection	We object to the whole of this Policy, as presented. It must be rewritten to give equal status to affordable housing, Community Land Trust developments, and Co-Housing.	The term 'affordable housing' is consistently used by local planning authorities and the Welsh Government. An explanation is provided in the Glossary of Terms on page 159 of the Deposit Local Development Plan which is consistent with national planning policy and guidance. A provider of affordable housing could include a Community Land Trust for example. **Conclusion:** Disagree.	Wish to be heard in English
170.	**2025 Home Builders Federation**	**Chapter 4E Housing** Policy 49 Affordable Housing	120	Objection	The HBF consider that the policy is currently not clearly worded and should include the affordable housing percentage requirements within the policy not in a separate table. Amend the words 'The percentage affordable housing requirements and contributions set out below will be sought.' By referring to the affordable housing requirement as a target. Wording is also required to explain that in considering the affordable housing requirement on each site that the viability of the proposed scheme will be taken account of.	Agree in terms of including the table within policy. The policy advises regarding the need to seek to negotiate and also cross references to Policy 53 which addresses how viability concerns will be considered. A focussed change regarding the need to negotiate on a site by site basis is also included in the reasoned justification under a separate representation from the Welsh Government. **Conclusion:** The National Park Authority proposes a Focussed Change as set out above.	Rely on written representations
171.	**2897 Marloes & St Brides Community Council**	**Chapter 4E Housing** P124 Section 4.296 Policy 50 b)	124	Objection	We object: this statement is too narrow. We propose, "Reduced densities are required as a result of significant site constraints, or to preserve a feature that will contribute to existing or future local amenity; furthermore, they may well be required on grounds of • sustainability; • self-sufficiency.	National planning policy (paragraph 4.7.2 of Planning Policy Wales 9 November 2016) asks planning authorities to include policies on higher densities. Policy 50 does refer to the need to reduce densities as a result of an unacceptable adverse effect on the character of the surrounding area. **Conclusion:** Disagree.	Wish to be heard in English
172.	**1569 - Welsh Government**	**Chapter 4E Housing Delivery: Gypsy and Traveller Accommodation** Assessment (GTAA) / Policy 51 Gypsy and Travellers	125	Objection Category C	Criterion a) is contrary to national policy. It implies Gypsies and Travellers have restricted freedom of movement to develop sites in other local authorities. This could be deemed as indirect discrimination under the Equality Act 2010 as Gypsies and Travellers are nomadic in nature and less likely to have a local connection to any particular local authority.	See Main Issues Consultation Report for the Authority's response.	
173.	**1569 Welsh Government**	**Chapter 4E Housing** **Gypsy and Traveller Accommodation** Assessment (GTAA) / Policy 51	125	Objection Category C	The GTAA states there is a need for 101 pitches across Pembrokeshire (2031) with an immediate need (by 2020) for 32 residential pitches and 2 Travelling Showpeople's yards. The Deposit Plan states "no need has been identified in the PCNP" (paragraph 4.301). This statement should be supported by a Statement of Common Ground with Pembrokeshire County Council and the Welsh Government's Equality and Prosperity Division in advance of the LDP examination.	**Conclusion:** Agree. See signed copy of the Statement of Common Ground – Appendix 2.	

		Gypsy and Travellers					
174.	**2897** **Marloes & St Brides Community Council**	**Chapter 4E Housing** P125 Section 4.298	125	Objection	We object to the final sentence, because the proposed high housing density policy is utterly counter to traditional Pembrokeshire rural culture. High housing density is not traditional in Pembrokeshire villages, where generous gardens are typical: the ability of people to create private garden spaces which are not overlooked, and the practical necessity of windbreak planting which takes up considerable space, are crucial considerations which lie at the heart of the enjoyment of village living.	National planning policy (paragraph 4.7.2 of Planning Policy Wales 9 November 2016) asks planning authorities to include policies on higher densities. Policy 50 does refer to the need to reduce densities as a result of an unacceptable adverse effect on the character of the surrounding area. Higher densities have not resulted in prohibiting hedgebanks being included in layouts. **Conclusion:** Disagree	Wish to be heard in English
175.	**1663** **Welsh Water**	**Chapter 4E Housing** Policy 51 Gypsy Traveller and Showpeople Sites	125	Support	We welcome the inclusion of criterion d), which ensures that adequate services are available in order for a site to be permitted.	Support noted	
176.	**2708 - Pembrokeshire County Council**	**Chapter 4E Housing** Policy 51 Gypsy Traveller and Showpeople Sites	125	Support	PCC support the policy approach set out in relation to accommodation for Gypsy Travellers and Showpeople. There is an identified need for additional accommodation in Pembrokeshire and this policy approach will enable any applications to be considered.	Support noted.	
177.	**4624** **M Lightwood**	**Chapter 4E Housing** **Saundersfoot** Candidate Site 031 North of Whitlow	128 C35	Objection	Objection refers to dangerous issues with traffic when the school finishes, spoiling the entrance to the village, lack of parking in the village and at the doctors.	Please see Main Issues in the Consultation Report for a response to the issues raised in this representation.	
178.	**3778** **S Bayes** **NAEG**	**Chapter 4E Housing** Candidate Sites 89, 89A and 83 **Newport**	128 C29	Objection	Issues are raised in relation to the development of greenfield land, impact on the landscape, the archaeological significance of Samson's mound, the proximity of the flood zone, pedestrian access and access onto the A487. Issues regarding the density proposed are also raised. What will be the implications of Site 089 and Site 83 being developed? Issues are raised regarding pedestrian linkages, traffic impacts.	Regarding issues raised on 'Land adjacent to Newport Business Park' the records supplied by Cadw detailing Scheduled Ancient Monuments do not show any such features within the site. Dyfed Archaeological Trust has required a predetermination assessment of the site which complies with national planning policy on the historic environment. The candidate site is within policy unit 4.16 of the West of Wales Shoreline Management Plan. The policy approach is one of allowing the natural evolution of the Nyfer estuary. A coastal risk area has been identified within the Deposit Local Development Plan for the coastal area at Newport which identifies land at risk from coastal flooding taking into account predicted sea level rise over the next 100 years. The risk area does not extend into the site allocated for residential development. Even so, the Shoreline Management Plan approach specifically advises that the natural evolution of the estuary would not preclude private flood defences. The comments provided by the Trunk Road Agency highlight a potential congestion issue on the single Feidr Pen-y-Bont access if the entire candidate site is developed. This was taken into consideration when considering the site. The Trunk Road Agency has advised that development of the north-west corner only, with the single access point from Feidr Pen-y-Bont is considered to be acceptable in principle. Thus – only a portion of the whole Candidate Site (as submitted) has been proposed for allocation in the Deposit Pan. The representor has stated that "…the junction of Feidr Pen Y Bont with the A487 is highly unlikely to accommodate traffic arising from MA232 as well, if and when that is developed."	

						No evidence has been provided to support this statement. Site MA232 has not been re-allocated but should an application be made for its development it would not be unusual for a Traffic Assessment to be required at the planning application stage – should the need arise. Such an Assessment would then determine the level of use/development that would be appropriate and identify any mitigation required to allow a development to go ahead. There are comments relating to pedestrian links and a preference expressed for site 083 instead of the allocated site. The distance from the access into the allocated site and the existing footway emerging from site 083 onto Feidr Pen-y-Bont is 26m with scope for the footway to be extended to the allocated site. As the two sites are immediately adjacent and share a common boundary, it is also highly likely that an alternative option could be achieved to create a pedestrian access through the site boundary. Site MA232 (083) has previously been granted planning permission for employment uses (implemented in part) and allocated for work/live units which have been implemented. It is considered, in the absence of any definite proposals for the use of the land that the best outcome would be to retain it as 'white land' within the Centre boundary which will allow consideration of a range of development proposals coming forward. Whilst exceptional land releases for the provision of 100% affordable housing are one means of providing for identified need, the reason for including site allocations for market housing is due to the lack of public subsidy for social housing and the need for cross-subsidy from the private housing market. **Conclusion:** Disagree	
179.	**2617** **Woodland Trust**	**Chapter 4E Housing** Candidate Site 087 Land at Castle Way Dale Candidate Site 031 North of Whitlow.	128 C10 C35	Objection	The Trust is concerned about site allocations included in the Pembrokeshire Coast Deposit Local Development Plan as development within these sites could potentially lead to the damage of the ancient woods adjacent to them. The Woodland Trust objects to the inclusion of the below site allocations in the Pembrokeshire Coast Deposit Local Development Plan as they may likely cause damage to the adjacent ancient woodland without appropriate mitigation in place. We will maintain our objection until there is a commitment to ensuring that development within these allocations will require appropriate buffer zones to be implemented and that the developers are required to consult with the Trust on such buffers during the planning process. Secondary woodland should also be retained to ensure that ecological networks are maintained and enhanced.	The land at Castle Way, Dale has not been allocated in the Plan. The Centre boundary for Dale has been drawn to exclude this land. The representation refers to English Planning Policy. Planning Policy Wales and Technical Advice Note 5 make reference to the need to protect trees and woodland, both as wildlife habitats and in terms of their contribution to landscape character and beauty. Buffering of the trees, hedgerows and woodland within the site against the effects of light and disturbance will need to be taken into account through the layout of development. Additional protection of trees can be considered through the designation of Tree Preservation Orders. The sites allocated in the Deposit Plan have been considered by the National Park Authority's Ecologist and it is acknowledged in the Candidate Site Assessment and in the Land Implementation Background Paper that such mitigation is likely to be required. The non-allocation of the land at Dale and the acknowledgement for the need for mitigation to protect trees and woodland at the site North of Whitlow addresses the concerns raised in this representation. **Conclusion:** Disagree.	Not advised.

180.	**4579** **D Haward (Agent)** **Mr & Ms Sharp**	**Chapter 4E Housing** **Dinas Cross** Candidate Site 105 Dinas Cross Land adj Nyth y Wennol	128 C11	Objection	Detailed submission contesting the assessment of Candidate Site 105 and requesting its allocation for 14–18 houses.	The main points contested are: i) Site access ii) Sewage constraints iii) Landscape impact The creation of an access into the site would require removal of hedgerow/trees, along with the upgrading of the narrow road leading from the main A class road to the site. The tranquil and rustic nature of the locality away from the main road are part of the intrinsic character of this area of Dinas Cross. Rather than adding to the fragmented development found beyond the edge of this Centres, the proposal would result in a considerable amount of development which would adversely impact on the character of this locality. Due to the site not being supported in principle, a detailed viability assessment has not been undertaken. **Conclusion:** Disagree.	Wish to be heard in English at Examination
181.	**4629** **Acanthus Holden (Agent) on behalf of Mr Lewis**	**Chapter 4E Housing** **Dinas Cross** Candidate Site 124 East of Tower Hill Dinas Cross Inset C11	128 C11	Objection	Objection to non-allocation of Candidate Site. The owner is happy to discuss developing the site. Some detail is provided in terms the extent of the site proposed, the access, electricity and water and sewerage. Advice is provided on affordable housing provision and constraints.	The landowner has commented that the minimum number of units he would wish to develop at this site is 20 to 25. The Highway Authority has advised that the only access to the site is restricted and suitably only for 4 to 5 dwellings. As a consequence there are viability issues as set out in the Land Implementation Study. There are also concerns about the pedestrian connectivity of the site with the village core. The landowner states that he does not intend to develop the site for 4 to 5 units. Highway constraints and lack of viability make it inappropriate to allocate this site for development. **Conclusion:** Disagree	Written representations
182.	**3397 – Mrs Barnes**	**Chapter 4E Housing** **Jameston** **Inset C13 for Jameston and other locations are referred to.**	128 C13	Concerns raised	Concerns raised regarding housing and affordable housing. Queries raised regarding lack of provision in Bosherston, Coheston, Cresswell Quay (C19), Hodgeston (OC8). Retain green spaces. HA10, Opposite Bush Terrace along with other sites will result significant increases in population and a loss of the open aspect of this site where arable farming was undertaken. Concerns are raised regarding the nature of affordable housing to be provided on site to be occupied by whom? Can the services cope? Traffic would increase on narrow lanes and there would be a disruption to wildlife. Lorries can't go under the bridge. Street lighting is limited to villages and cycle paths and footpaths do not exist between Penally and Lydstep. The routes are used for practicing for major sporting events in the summer when closures occur. Community facility provision is poor and residents have to travel. There is a Dark Sky Discovery site at Skrinkle. Population is declining and employment opportunities limited. There is a heritage dry stone wall in the site that needs retaining along with the footpath.	With regard to general points made on housing and affordable housing provision the 'Affordable Housing and Housing Provision' section provides the rationale for the housing land supply generally in the Plan area. The nature of affordable housing provision is primarily rental properties and in this location the provider is likely to be a housing association. Controls are set in terms of the rents that can be charged and the manner in which property is occupied by the housing association. Those occupying old or new properties developed in the area can take advantage of existing or future employment opportunities in the locality. The Local Development Plan doesn't specifically identify sites for employment development but includes criteria based policies for future development. The Authority has provided evidence in its Background Paper on employment. There is a section on 'Workplace Zones which shows the work place zones in Pembrokeshire with a colour gradation indicating the proportion of the persons working in each zone (aged 16+) that also live within that zone. Bosherston, Cosheston, Cresswell Quay and Hogeston – No sites were submitted for the authority to consider. The criteria based policies of the Plan could allow for some form of development in these locations. The site at Jameston was allocated for residential development in the Local Development Plan in 2010 and the landowner has been preparing a planning application to bring the site forward for development. A Candidate Site submission for the site was submitted and given the history of the site and the landowner's	Speak in English regarding the 'Overall Housing Target'

						intent to bring it forward for delivery it was concluded that it is appropriate to be included as an allocation in the Deposit Plan. The delivery of affordable housing will be secured by appropriate means to ensure it remains affordable in perpetuity by those on the affordable housing register. A full assessment of the site has been undertaken and can be found in the Candidate Site Register, site 022. **Conclusion:** Disagree.	
183.	**3251 Acanthus Holden (Agent) on behalf of Mr and Mrs Davies**	**Chapter 4E Housing Little Haven** Candidate Site 27 Penberry Little Haven Inset C18	128 C18	Objection	The Plan should include this site. In summary planning permission was nearly granted on the last application. An old entrance has been opened up. There is development taking place in Little Haven. Second homes is an issue and this could be an opportunity for one dwelling for a local family.	No additional details have been submitted with this submission to support change to the Candidate Site assessment. An application to develop the site in 2014 was refused following a site visit by the Development Management Committee. Following an unauthorised access being created through adjoining land enforcement action is currently ongoing. **Conclusion:** Disagree.	Wish to speak in English at the hearing.
184.	**2873 Angle Community Council**	**Chapter 4E Housing Angle Candidate Sites 116a**	128 C2	Support	From the original submission of Site 116 this updated proposal would be in keeping with minimal visual impact within the village. Further more detailed comments are provided.	Support noted.	
185.	**Angle Community Council**	**Chapter 4E Housing Candidate Site 118a**	128 C2	Object	The Community Council still feel that this plot is an unacceptable site. Detailed comments are provided.	The conclusion of the site assessment was that it would be appropriate for part of the site to be developed as a small exception site for up to 5 affordable houses. The extent of the area from the road considered to be acceptable coincides with the extent of the adjacent properties minus their gardens and a layout could be achieved which replicates the linear style characteristic of Angle. The site has not been allocated and would only be acceptable as an exception site. The lack of facilities and in particular a regular year-round bus service is regrettable – but planning policy does allow for affordable housing for local need to be located in places only accessible by car. Dwr Cymru/Welsh Water has commented on the capacity of the sewage system and advised that an additional 10 units can be accommodated within the village. This will further need to be considered should an application be made to develop the site for affordable housing. **Conclusion:** Disagree.	
186.	**4602 – Ms P Harris**	**Chapter 4E Housing Angle Candidate Sites 116 & 118 Angle**	128 C2	Object	Grounds of objection are the lack of capacity in the sewerage system, water and telephone system, traffic impacts (particularly in the summer), the lack of amenities such as a shop and school. There is also only seasonal employment. **Change:** Assume it is to not to allow the development of these sites. The sites are identified on the Candidate Site Register as potential exceptions sites (parts of the sites).	The sites were submitted as Candidate Sites and have been assessed as part of that process. The conclusion was that small areas of the sites would be appropriate as exception sites for 100% affordable housing provision. Part of the assessment included consulting the Highway Authority and Dwr Cymru/Welsh Water and their responses in part limited the development of the sites to small numbers (i.e. 5 units each). Whilst it is regrettable that Angle no longer has a shop or a school it does have sufficient facilities and services to be a Rural Centre in the Plan. **Conclusion:** Disagree.	Not advised
187.	**3319 Owen & Owen (on behalf of Hean Castle Estate)**	**Chapter 4E Housing Saundersfoot** Candidate Site 031A	128 C35	Objection	The approach set out in the Plan will result in putting the viability of the site at risk. The site originally submitted should be allocated.	Please see Main Issues for the Deposit Plan in the Consultation Report.	Appear at Examination

188.	**3391** **Mr J Pattenden**	**Chapter 4E Housing Saundersfoot** Saundersfoot Sites 031/031A Land north of Whitlow and Castle View	128 C35	Objection	A detailed submission referring to issues regarding the scale of development proposed in conjunction with other sites in the village, impact on biodiversity, the rural landscape, trees, the school, the surgery, the rural lane, emissions, managing traffic, impacts on access for recreational purposes, the development of a concrete jungle, second home development, sewerage capacity, the capacity of the roads . Employment prospects are questionable and the sites are more likely to be affected by mine workings. Other sites proposed will be less affected but even so all taken together Saundersfoot will lose its tranquillity.	Please see Main Issues Consultation Report for a response to issues raised in this representation.	
189.	**3564** **AT & RA James**	**Chapter 4E Housing Saundersfoot** 54 Properties north of Castle View Saundersfoot	128 C35	Strongly object	Issues referred to include: - Construction traffic via the village because of the low bridge - Traffic at the school - Lack of a footpath from the station - Impact on the wildlife and woodland.	Please see Main Issues Consultation Report for a response to issues raised in this representation.	
190.	**3567** **Ms Stafford**	**Chapter 4E Housing Saundersfoot** 3 Housing Developments Saundersfoot	128 C35	Objection	The village will not cope with the large influx of people and cars etc. Will development eventually extend towards Pentlepoir or Kilgetty? There are capacity issues at the doctors and the school, with sewage disposal (with tourism implications). The Cambrian development casts into doubt the delivery of affordable housing from these developments Would the houses be holiday homes? The Castle View fields have protected species and trees would be lost. Access for the site is dangerous.	Please see Main Issues Consultation Report for a response to issues raised in this representation.	Not advised
191.	**3569** **Mr Jones**	**Chapter 4E Housing Saundersfoot** North of Whitlow Penny Farm Sandy Hill	128 C35	Objection	Detailed comments provided regarding the access to North of Whitlow and Penny Farm. Also referred to in relation to North of Whitlow are the impact on the entrance to Saundersfoot, poor employment opportunities, the resulting purchase of second homes and travelling out of the village for work. A lesser impact is envisaged with the other two sites. Issues regarding the school and surgery are resource dependant. The author also advised his neighbours Lyn and Cheryl supported these sentiments.	Please see Main Issues Consultation Report for a response to issues raised in this representation.	
192.	**3572** **Cannon Michael Butler**	**Chapter 4E Housing Saundersfoot** Site 031 North of Whitlow	128 C35	Objection	Clarity is needed re what is being proposed. There is confusion between the site assessment and what is being proposed in the Plan. It would be the thin end of the wedge in any case. It would be useful to look at the 10th of December 2009 Authority assessment of the site. Reasons are quoted. The Chair of the Governors for the school is concerned regarding congestion and capacity. Parking and capacity at the medical centre is also an issue. Michael Gove is setting up a review of National Parks.	Please see Main Issues Consultation Report for a response to this representation.	
193.	**3573 – Mr & Mrs Evans**	**Chapter 4E Housing Saundersfoot Housing Proposals**	128 C35	Objection	4 main areas of concern regarding the number of houses proposed. The submission sets out details on education, health care provision, access roads, and sewage. Concern is also raised regarding the impact tourism.	Please see Main Issues Consultation Report for a response to this representation.	

194.	**3575** **Mr Williams**	**Chapter 4E Housing Saundersfoot** HA4 Sandy Hilll HA5 Whitlow HA6 Penny Farm Page 153 – 154 Table 7 Housing Allocations	128 C35	Concerns	Reference is made to impact on the local primary school in terms of overcrowding and traffic issues.	Please see Main Issues Consultation Report for a response to this representation.	Not advised.
195.	**3582 Ms Barnett**	**Chapter 4E Housing Saundersfoot** Site Allocations in Saundersfoot 031 & 031A	128	Objection	Similar to those I submitted in 2010. Issues referred to include: - Lack of infrastructure - Lack of services and facilities - Increase in second homes - Access issues - Lack of employment opportunities - need to protect the green belt.	Please see Main Issues Consultation Report for a response to this representation.	Attend examination speak in English
196.	**4451** **Mr R Williams** **On behalf of Friends of Saundersfoot and District**	**Chapter 4E Housing Saundersfoot** Housing Development Element	128 C35	Concerns	The proposals are excessive for the size of the village, will encourage second homes, unsupportable levels of traffic, impact on local services, lead to a loss of haitat and wildlife and call into question the villages designation as a 'C2' village. Detailed points are made regarding housing need, traffic, impact on local servcies, loss of amenity and wildlife and floodrisk.	Please see Main Issues Consultation Report for a response to this representation.	
197.	**4599** **Mrs C Cox**	**Chapter 4E Housing Saundersfoot** HA04/HA05/HA06 (Sites 031 & 031A)	128 C35	Objection	Objection sets out concerns regarding retaining affordable housing for local people, the capacity of the school and the doctor's surgery, lack of parking and the suitability of the roads.	Please see Main Issues Consultation Report for a response to this representation.	
198.	**4605 – Mr Lightwood**	**Chapter 4E Housing Saundersfoot Candidate Site 031 North of Whitlow Saundersfoot**	128 C35	Objection	This area is off a beautiful drive into Saundersfoot. Site will be accessed off a dangerous bend where the objector has near misses with cars. The school run adds to the congestion and emergency vehicles would not get through. The village is loved by many families who regularly come and spend money and keep the local shops, restaurants and coffee shops in business. Parking is impossible and the entrance roads not wide enough for more cars. There is a danger of losing tourists with a large housing estate at the entrance to the village.	Please see Main Issues Consultation Report for a response to this representation.	Not advised
199.	**4606 – Ms Cotman**	**Chapter 4E Housing Saundersfoot** Proposed development 031 and 031A	128 C35	Strongly object	See representation 4607.	Please see Main Issues Consultation Report for a response to this representation.	Not advised

200.	**4607- Mr Cotman**	**Chapter 4E Housing Saundersfoot** Proposed development 031 and 031A	128 C35	Strongly object	The infrastructure in Saundersfoot would not cope. Parking is already an issue in the community. Doctors' appointments are difficult to get along with parking at the surgery. Local shops barely cope with supplies at times and are frequently running out of basics. There are no dental facilities available. Many properties will be built but few under £200,000. The school and nursery are over capacity. Access to the school is dangerous and parking difficult.	Please see Main Issues Consultation Report for a response to this representation.	Not advised
201.	**4609 – Mr Cogin**	**Chapter 4E Housing Saundersfoot** Candidate Site 015 Sandy Hill Rd Saundersfoot.	128 C35	Objection	I have read correspondence submitted by Mr & Mrs Merriman concerning 1, 2 & 3 Hillside Cottages Sandyhill Road, The land adjoining our front wall is said to be likely an adopted highway, I strongly dispute this as a few years ago I asked for this land to be resurfaced, a highways representative attended my property and said the land directly fronting our properties is not adopted and was my responsibility, this concurs with what neighbours told me and the previous owner. Please ensure this concern is noted.	Contact has been made with Pembrokeshire County Council regarding this representation. The following advice was received – *Having considered the points raised by Mr Cogin in his objection and having reviewed our definitive highway records (particularly the 1970's Ordnance Survey highway plan), I note there has been no change in the boundaries fronting 1-3 Sandy Hill Road. Given that this area in question has clearly been open and included as part of the adopted highway network for some considerable time, I see no reason to amend our highway record to exclude this area and as such remains adopted highway.* The objector has not provided any definitive written evidence to support his ownership of the land and therefore it would appear that the land is adopted highway. **Conclusion:** Disagree	Not advised
202.	**4611 – Mr & Mrs Davies**	**Chapter 4E Housing Saundersfoot** Saundersfoot – housing	128 C35	Objection	New infrastructure needed before housing is developed. The entrance to Saundersfoot in particular the road from Pentlepoir will have difficulties coping in the busy periods and needs addressing. The surgery's car parking is inadequate. This issue cannot be addressed. The school lacks capacity and needs another building which would need to be placed on the open space. Parking is an issue and there is congestion at the school.	Please see Main Issues Consultation Report for a response to this representation.	Not advised
203.	**4612 – Ms Williams**	**Chapter 4E Housing Saundersfoot** Large scale development of Saundersfoot in particular Candidate Site 031/031A Saundersfoot Assessment/	128 C35	Objection	Concern at the scale of housing development proposed and the assessment of the sites. Why are these sites now considered suitable when they weren't in the past? There would be an adverse impact on the character of the area, an overloading of infrastructure, services and amenities. Housing need is less than half of that in Tenby, A developer in Saundersfoot has not provided affordable housing. Properties are used as second homes.	Please see Main Issues Consultation Report for a response to this representation. With regard to the comment relating to the scale of development and the source of evidence – Affordable housing need is set out in the Local Housing Market Assessment. Appendix 1 to the Housing Background Paper provides a summary. It shows an annual need of 45 units per annum between 2014 and 2019. A new Local Housing Market Assessment is currently being commissioned (Sept 2018). The figures demonstrate substantial annual need albeit for just the	Not advised

		Sustainability Appraisal			A detailed commentary is provided on the assessment. See link below for full details:	beginning of the Plan period. The level of housing provision is for the full Plan period 2015 to 2031 and will help meeting need identified. **Conclusion:** Disagree	
204.	**4613 – Mr & Mrs Cheadle**	**Chapter 4E Housing Saundersfoot** Candidate Site 031/031A North of Whitlow Saundersfoot	128 C35	Strong objection	Points of concern regarding access, local amenities, village character, wildlife, services and that there is no demand for new housing. Access: Access is from a narrow country lane and any alterations would damage the character of the area. A proposal was turned down here a few years ago. Local Amenities: 50 new families will put a strain on services. If the larger development takes place this would be 121 dwellings by 2031. The surgery and school is stretched. Character: Saundersfoot is an attractive village which attracts visitors. Wildlife: The neighbouring habitat would be disrupted. Services: There will be a need to expand water and drainage which will impact on neighbouring land. Demand: Is there any demand for dwellings as there are few employment opportunities? There are properties for sale. The situation will be exacerbated.	Please see Main Issues Consultation Report for a response to this representation.	Not advised
205.	**4616 Ms J Lightwood**	**Chapter 4E Housing Saundersfoot** Housing Development Saundersfoot in particular North of Whitlow and Castle View (31/031A	128 C35	Objection	Issues raised regarding the nature of the roads leading into Saundersfoot, the school, the surgery. There are wildlife species that require protection, There are mining shafts and possibly an ammunitions dump on the site. Also an adverse impact on the quite coastal village that families like to visit. Change: Purchase existing houses instead.	Please see Main Issues Consultation Report for a response to this representation.	
206.	**4617 T Cemm**	**Chapter 4E Housing Saundersfoot** Phase 1 Site 031 North of Whitlow	128 C35	Objection	Concerns raised regarding the impact on wildlife, impact on services (doctors, the village school, traffic, parking, water, electric, sewerage). Access to the site itself is potentially dangerous.	Please see Main Issues Consultation Report for a response to this representation.	Not advised
207.	**4618 W Jenkins**	**Chapter 4E Housing Saundersfoot** Housing Development Saundersfoot	128 C35	Objection	A detailed response is provided covering concerns regarding the price of new housing for young families, houses being bought for second homes and the impact of this on the village, the beauty of the area, the impact on the infrastructure (traffic, railway station, parking, the school, the medical centre, the redevelopment of the harbour area, lack of recreation facilities for the new development.	Please see Main Issues Consultation Report for a response to this representation.	Not advised
208.	**4619 Mrs Jenkins**	**Chapter 4E Housing Saundersfoot** Parts of the Plan that affect Saundersfoot	128 C35	Major concerns	A detailed response is provided covering issues such as health care difficulties, second homes, road infrastructure and safety, car parking, school facilities and building on the edge of villages which will result in a characterless landscape. Change: Not to have more house building.	Please see Main Issues Consultation Report for a response to this representation.	Not advised
209.	**4620 – M J Lightwood**	**Chapter 4E Housing Saundersfoot** Housing Proposals in Saundersfoot especially Candidate 31/031A North of Whitlow	128 C35	Objection	Submission refers to high house prices in the area and developer's will not want affordable housing. Houses will be bought as second homes. There will be an adverse impact on wildlife. List provided of species. There are insufficient jobs for houses provided. There are potentially mining hazards in the area and ordinance dumped by the military. Issues regarding increased traffic are explained and photos attached.	Please see Main Issues Consultation Report for a response to this representation.	Not advised

210.	**4621** **Mr & Mrs Humphreys**	**Chapter 4E Housing Saundersfoot** Proposed Housing Development - Saundersfoot	128 C35	Opposed	The response sets out concerns regarding medical facilities, the school, traffic and road access, impacts on wildlife habitat and pollution issues.	Please see Main Issues Consultation Report for a response to this representation.	Not advised
211.	**4623** **PETITION** **lead** **Mr & Mrs Robinson**	**Chapter 4E Housing Saundersfoot** Sandyhill Rd – 68 dwellings, Whitlow – 54 dwellings with a potential for 121 on an adj field. Penny Farm 36 dwellings	128 C35	Objection	The petition sets out opposition to the proposals in terms of roads, traffic, the health centre, school and sewage system. In particular the Ridgeway is of concern with increased traffic and associated pollution. What has changed since proposals were last rejected? 28 petitions representing 41 individuals attached.	Please see Main Issues Consultation Report for a response to this representation.	Not advised
212.	**4625** **Mr & Mrs Roberts**	**Chapter 4E Housing Saundersfoot** Future Development at Saundersfoot	128 C35	Concerns	Concerned regarding the infrastructure being able to cope. Reference is made to the entrance roads, the availability of parking, the capacity at the surgery, the capacity of the sewage treatement works, risks of flooding in the centre and extra surface water run-off. How can the houses be prevented from becoming second homes? Can affordable housing be kept affordable in the log term? How will they be priced?	Please see Main Issues Consultation Report for a response to this representation.	
213.	**4626** **Mrs Parfitt**	**Chapter 4E Housing Saundersfoot** Proposed building developments at Saundersfoot	128 C35	Objection	The proposals are considered to be ludicrous. Detailed comments are provided rgarding Sandyhill Park Rd in terms of access, drainage and sewage and medical and health care facilities along with general facilities. Comments on access and the narrowness of roads are provided for 'Whitlow'. Keep Saundersfoot as a very nice village. Large developments will affect the character of the area.	Please see Main Issues Consultation Report for a response to this representation.	
214.	**4627** **Mrs Patterson**	**Chapter 4E Housing Saundersfoot** Proposed building developments at Saundersfoot	128 C35	Objection	The proposals are considered to be ludicrous. Detailed comments are provided rgarding Sandyhill Park Rd in terms of access, drainage and sewage and medical and health care facilities along with general facilities. Comments on access and the narrowness of roads are provided for 'Whitlow'. Keep Saundersfoot as a very nice village. Large developments will affect the character of the area.	Please see Main Issues Consultation Report for a response to this representation.	
215.	**4628** **Mr & Mrs Pettifer**	**Chapter 4E Housing Saundersfoot** 3 sites proposed for new homes in Saundersfoot	128 C35	Against	Reasons outlined refer to wishing Saundersfoot to stay a village, the loss of green fields, impact on the medical centre, the local school, parking the need to improve local roads, poor access to the train station, the delivery of affordable housing is questionable. Development elsewhere such as Tenby would be better suited.	Please see Main Issues Consultation Report for a response to this representation.	

216.	**4630 Mr Cleevely**	**Chapter 4E Housing Saundersfoot** Site 031/031A Saundersfoot	128 C35	Observations	There is evidence that developments are used for second homes and for retirees. The Cambrian Hotel development has not delivered affordable housing. Could the Conservation Area be at risk? Infrastructure and services will be put under pressure. Saundersfoot would lose its charm. The sites are used for public amenity purposes and there will be a loss of natural beauty, habitats and wildlife. The B4316 is an undeveloped country lane. Other sites proposed may well have more to commend them.	Please see Main Issues Consultation Report for a response to this representation.	
217.	**4631 A & P Brace**	**Chapter 4E Housing Saundersfoot** 175 houses in Saundersfoot (Sandyhill Park, Whitlow and Castle View)	128 C35	Objection	I would like to state my objections to planning for a further 175 houses in Saundersfoot (Sandyhill Park, Whitlow and Castle View saundersfoot does not have the capacity for more large scale housing The roads and traffic management would not cope Doctors and schools The village is a village and would lose its identity as a village Green space around the area There are not enough jobs one the area for more intake of people Would not want the houses bought as second homes.	Please see Main Issues Consultation Report for a response to this representation.	
218.	**4632 P & R Cox**	**Chapter 4E Housing Saundersfoot** Saundersfoot North of Castle View Housing Plan	128 C35	Objection	We often walk there down to St Issells as the scenery is so pretty and we often see a variety of wildlife. This beautiful area of Saundersfoot must not be destroyed. It's USP as a tourist destination, which is essential to the survival of the village, is that it is undeveloped! How many seaside resorts, with the wonderful facilities Saundersfoot has, can you approach driving through such pretty and unspoilt lanes? This would be lost if the plans go ahead.	Please see Main Issues Consultation Report for a response to this representation.	
219.	**4633 Mr & Mrs Campion**	**Chapter 4E Housing Saundersfoot** Site 031/031A Saundersfoot	128 C35	Strongly oppose	Large scale development opposed. Although supportive of affordable housing we are not supportive of market housing. They will be used as second homes. Other approaches should be used. Some suggestions are provided. There is also concern regarding how affordable houses are occupied.	Please see Main Issues Consultation Report for a response to this representation.	Rely on written representations
220.	**4634 S Butler**	**Chapter 4E Housing Saundersfoot** Housing Development behind Whitlow and Castle View	128 C35	Objection	I'm sending this email to object in the strongest terms to the planned housing development behind Whitlow and Castle View. Large scale housing development will spoil forever the tranquility of Saundersfoot village which is the very reason people visit. Facilities cannot possibly cope with the increased demands such a development would create. Surely there must be other sites more suitable within the Pembrokeshire region.	Please see Main Issues Consultation Report for a response to this representation.	
221.	**4635 D& L Butler**	**Chapter 4E Housing Saundersfoot** Candidate Site 031A Saundersfoot	128 C35	Objection	Submission referes to the appeal of Saundersfoot to visitors, the ability of the infrastructure to cope and the loss of beautiful countryside	Please see Main Issues Consultation Report for a response to this representation.	
222.	**4636 Mr & Mrs Harvey**	**Chapter 4E Housing Saundersfoot** Proposed Housing	128 C35	Strong objection	As visitors to Saundersfoot this will destroy the beauty and character of the village. This is why we visit. Questions raised regarding infrastructure capacity including traffic.	Please see Main Issues Consultation Report for a response to this representation.	

		Developments at Saundersfoot			f		
223.	**4638** **Mr & Mrs Cox**	**Chapter 4E Housing Saundersfoot** The proposal for up to 279 houses (36 at Penny Farm)	128 C35	Concern/ opposition	Penny Farm – the Ridgeway is already very busy and won't be able to cope. Penny Farm have purchased Nos 30 and 31A North Close and have demolisehd the fence to create an access. This will cause traffic generation on what was designed as a 'Close'.	Please see Main Issues Consultation Report for a response to this representation. With regard to the comments relating to the potential access to sites A and B Penny Farm, it is acknowledged by the Highway Authority (following a site visit) when responding to the original Candidate Site enquiry from the landowner that there are issues with accessing the site from North Close which will require resolution, including the need to improve parking arrangements and prevent parking on footways. It is accepted that an access from Fan Road will also be required for site B but this is limited to 36 dwellings. The Highway Authority will also seek financial contributions to improve pedestrian links from North Close into the site and from the site, along Fan Road towards the railway station. **Conclusion:** Disagree.	
224.	**4639** **Ms N Mallen**	**Chapter 4E Housing Saundersfoot** Saundersfoot Sites 052 = Open Space proposal 015 Land at Sandy Hill 016 Brooklands 036A Penny Farm 037B Penny Farm 038B 031& 031A North of Whitlow	128 C35	Objection	Unfortunately I am only finding out about this belatedly and I have little time to investigate. My objections to all these housing developments are that Saudersfoot is in a National Park, there will be greater loss of wildlife, impacts on tourism, impacts on the surrounding countryside . Services and infrastructure will not cope nor the health centre and school.	Please see Main Issues Consultation Report for a response to this representation.	Rely on written representations
225.	**4640** **Ms Prout**	**Chapter 4E Housing Saundersfoot** Land north of Whitlow and Castle view in Saundersfoot	128 C35	Unacceptable	Reasons include impact on the natural beauty and ancient woodland and wildlife, the route into Saundersfoot, the village itself in terms of its attractiveness and the school and doctors. Seems to contradict the National Park Authority's approach to proposals for a conservatory where you can't get permission.	Please see Main Issues Consultation Report for a response to this representation.	
226.	**4642 B Pattenden**	**Chapter 4E Housing Saundersfoot** **Candidate Site 031(north of Whitlow) and Candidate Site 031A (north of Castle View)**	128 C35	Objection	Submission refers to impact on the natural environment in a National Park, damage to the visual appeal of Saundersfoot village and the picturesque country road. Impact on air quality and mental wellbeing is also referred to. Unoccupied properties be used instead without impacting on services. This would impact adversely on tourism, facilities, services and infrastructure. This site has previously been considered unsuitable for development. Nothing has changed.	Please see Main Issues Consultation Report for a response to this representation.	
227.	**4644 M Stafford**	**Chapter 4E Housing Saundersfoot Development**	128 C35	Objection	Reasons include the land lies beyond the village boundary, impact on the charm of the village, impact on services and facilities, impact on wildlife and woodlands, impact on the entrance into Saundersfoot.	Please see Main Issues Consultation Report for a response to this representation.	

		Plans for land north of Whitlow and Castle View Saundersfoot					
228.	**4645 Ms Wood**	**Chapter 4E Housing Saundersfoot Development Plan Saundersfoot**	128 C35	Opposition	I do not believe the facilities within the area can cope with the development. It is only going to be detrimental to the village and you should take into account the irreversible consequences of such a project.	Please see Main Issues Consultation Report for a response to this representation.	
229.	**4647 Ms E Pattenden**	**Chapter 4E Housing Saundersfoot** Candidate Site 031 and 031A (Saundersfoot North of Whitlow/Castle View)	128 C35	Objection	A detailed submission outlining the basis for objection: 1) Previous rejection of the site 2) Issues in relation to the sustainability appraisal 3) Impact on the local environment 4) National profile and prestige	Please see Main Issues Consultation Report for a response to this representation.	
230.	**4648 Mr J Cox**	**Chapter 4E Housing Saundersfoot** 036,037 and 038 – Penny Farm, Saundersfoot Sites A, B, C	128 C35	Objection	Detailed comments are provided on the Penny Farm site assessments in relation to concerns regarding planning history, highways, sewerage, traffic congestion, bats, the colour coding on an assessment. Comment is also made on the short time frame for providing comment. Photo also included.	Please see Main Issues Consultation Report for a response to this representation.	Wishes to rely on written representations
231.	**4649 Ms MacDougal**	**Chapter 4E Housing Saundersfoot** 015,031,031A	128 C35	Objection	69 houses at the top of Sandyhill Rd. Issues referred to are: - traffic increasing - dangerous road - the size of vehicles - the speed of vehicles - impact on the school - impact on the health centre - Impact on local amenities and infrastructure	Please see Main Issues Consultation Report for a response to this representation.	Wishes to rely on written representations
232.	**4650 Ms Einon**	**Chapter 4E Housing Saundersfoot** Saundersfoot Development Plan	128 C35	Objection	Concerns regarding the development of second homes etc, impact on the village and trees when roads need improving.	Please see Main Issues Consultation Report for a response to this representation.	
233.	**4651 Mr Gordon**	**Chapter 4E Housing Saundersfoot** Saundersfoot Development Plan	128 C35	Objection	Saundersfoot is a small fishing village and more development would impact on its character and charm. Services would be put under further strain and the road system.	Please see Main Issues Consultation Report for a response to this representation.	Rely on written representations.
234.	**4657 Mr Luckett**	**Chapter 4E Housing Saundersfoot** 036, 037 and 038 - Penny Farm Saundersfoot Sites	128 C35	Objection	Detailed comments are provided on the Penny Farm site assessments in relation to concerns regarding planning history, highways, sewerage, traffic congestion, bats, the colour coding on an assessment. Comment is also made on the short time frame for providing comment. Photo also included.	Please see Main Issues Consultation Report for a response to this representation. Viability assessments of sites A and B Penny Farm have been undertaken to demonstrate the likely level of affordable housing provision that can be delivered from these sites and they show that 45% (16 units of the 36 proposed in total) should be affordable	Rely on written representations

		A, B and C				dwellings. With regard to the comments relating to the potential access to sites A and B Penny Farm, it is acknowledged by the Highway Authority (following a site visit) when responding to the original Candidate Site enquiry from the landowner that there are issues with accessing the site from North Close which will require resolution, including the need to improve parking arrangements and prevent parking on footways. It is accepted that an access from Fan Road will also be required for site B but this is limited to 36 dwellings. The Highway Authority will also seek financial contributions to improve pedestrian links from North Close into the site and from the site, along Fan Road towards the railway station. **Conclusion:** Disagree	
235.	**4659** **Mr & Mrs Evans**	**Chapter 4E Housing Saundersfoot** Rear of Whitlow Saundersfoot	128 C35	Total objection	The fields and woodlands are beautiful. There is an abundance of wildlife. The school is overstretched. There are capacity issues at the doctor's surgery. Use the Brynhir site instead. The beautiful village of Saundersfoot would be spoiled.	Please see Main Issues to the Consultation Report for a response to the issues raised in this representation.	
236.	**4660** **Mrs Evans**	**Chapter 4E Housing Saundersfoot** Site 031 Back of Whitlow Estate, North of Castle View (54 houses) with a future (121) later	128 C35	Objection	Issues raised in relation to impact on the character of the village, traffic impact, pressure on the school and doctors surgery, impact on the woodland, impact on wildlife. It would be better to use Council owned land at Brynhir Tenby. Will the houses be affordable? Michael Gove wishes to protect National Parks for future generations. The land was on a Green Belt. A show of hands at a recent meeting resulted in 180 against and 2 in favour.	Please see Main Issues to the Consultation Report for a response to the issues raised in this representation.	
237.	**4661 J Pattenden** **PETITION**	**Chapter 4E Housing Saundersfoot** Saundersfoot Candidate Sites 031/031A	128 C35	Objection	Online petition opposing development of these sites plus a hard copy petition.	Please see Main Issues of the Consultation Report for a response to the issues raised in this representation.	
238.	**4622** **Ms Price (Agent) on behalf of Mr & Mrs Fletcher**	**Chapter 4E Housing Solva** New Site Allocation needed - Solva	128 C37	Object	A small site is proposed for 50% affordable housing. The Site Submission Form for Preferred Strategy stage is used.	An assessment and sustainability appraisal has been undertaken for this site – please see Post Deposit New and Amended Sites on the Consultation Report webpage for a full assessment – Site Reference 401. Development of this site would damage the character of this part of Solva and to the setting of the Listed Buildings adjacent to the site. It would also be harmful to key features identified in the Conservation Area. Thus development here would be harmful to the Special Qualities of the National Park and would not comply with the Preferred Strategy of the Replacement Plan. **Conclusion:** Disagree.	Rely on Written Representation
239.	**4641** **Mr D Haward (Agent)** **On behalf of Mr R Wigley-Jones**	**Chapter 4E Housing Square & Compass** Candidate Site 308	128 C38	Objection	The site has been identified as an exceptions site for affordable housing. Similar sites have failed to come forward in the National Park. A better way of providing it is to provide a mix of affordable and open market housing. Detailed submission provided.	To consider the viability of this site as an exception site for affordable housing, a scheme of 5 units (maximum considered to be acceptable by the Highway Authority) was entered into the Wales Development Appraisal Kit (DAT). The development characteristics for the scheme were based on the Local Housing Market Assessment prepared by Pembrokeshire County Council. Proportionately, this was a scheme of four one-bed flats and a single two-bed flat with all as social-rented units. The default build costs and other costs included in the toolkit were used and no abnormal costs or planning obligations were applied to the model. The toolkit was also run assuming that grant money is available	Wishes to be heard and speak in English

						and the grant amount is calculated in the toolkit based on Acceptable Cost Guidance. These parameters yielded a positive residual land value, demonstrating that this site should be viable as an exception site for affordable housing, with grant assistance. The site is shown to be viable for an affordable housing development, with grant assistance. **Conclusion:** Disagree.	
240.	**2910** **St Davids City Council**	**Chapter 4E Housing St Davids** HA789 Adjacent to Ysgol Bro Dewi	128 C39	Object	HA789 Adjacent to Ysgol Bro Dewi - retain the site in the LDP as housing allocation.	The site is allocated in the current Local Development Plan but no interest has been expressed in bringing it forward for development to date. (Site 142). The landowner submitted part of the site as a Candidate Site (site 097) but the deliverability concerns remain and there access into that part of the site is currently not feasible. The acceptability of the site in landscape and other terms means that whilst it cannot form part of the housing land supply it has potential as an exceptional land release for 100% affordable housing provision. The City Council has not provided any supplementary evidence to challenge the overall assessment of sites 097 and 142. **Conclusion:** Disagree.	Wishes to appear and speak English
241.	**4652** **Janet Price (Agent)** **Mr Dixon (Rugby Club Treasurer)** **St David's Rugby Club**	**Chapter 4E Housing St Davids** St Davids New Site Allocation proposed	128 C39	Object	A site location plan for the development of market and affordable housing is provided. A site submission form for the Preferred Strategy stage is completed. The proposal would fund a replacement rugby club and ground.	An assessment and sustainability appraisal have been undertaken for this site – See Site Reference 402 Consultation Report webpage, Post Deposit New and Amended Sites. Development of this site would be visually intrusive, result in loss of open space and would be harmful to the Special Qualities of the National Park. It would not comply with the Preferred Strategy of the Replacement Plan. **Conclusion:** Disagree	Rely on written representations.
242.	**4658** **Ms C Gray**	**Chapter 4E Housing St Davids** New allocation proposed St Davids – Land adj to the Cow shed, Glasfryn Lane	128 C39	Objection	Mixed allocation for affordable housing and employment proposed.	An assessment and sustainability appraisal have been undertaken for this site – See Site Reference 405 Consultation Report webpage, Post Deposit New and Amended Sites. The landowner has submitted the site to be considered for affordable housing and employment use. Both of these types of development can be permitted outside Centre boundaries. Development of the site would be acceptable in principle and its use for affordable housing and employment uses would support the Preferred Strategy of the Replacement Plan. It is not considered necessary to alter the Centre boundary nor to allocate the land to achieve compliance with the Plan. Additional information would be required relating to viability and sewage capacity. **Conclusion:** Disagree	Wish to appear and speak in English
243.	**4608 – Mr Preece**	**Chapter 4E Housing St Davids** New Site Proposed – St Davids – 'Trevinert Fields'	128 C39 and PM4	Objection	This proposal is for Housing – 50 dwellings including affordable housing. Candidate Site form completed.	An assessment and sustainability appraisal have been undertaken for this site – See Site Reference 400 Consultation Report webpage, Post Deposit New and Amended Sites. Development of the site would cause an unacceptable impact on the special qualities of the National Park and would not accord with the Preferred Strategy of the Replacement Plan. **Conclusion:** Disagree	Rely on written submission
244.	**4443 Acanthus Holden (Agent) on behalf of Mr Marshall**	**Chapter 4E Housing St Ishmaels**	128 C40	Objection	Objection to non-allocation of a Candidate Site. Reasoning refers to the site being allocated in the current Local Development Plan, the owner actively pursuing the site's development, phasing the proposal taking account of infrastructure needs. Viability concerns with a previous scheme are commented on as are the suitability of the Centre for development and ecological and heritage constraints. SUDS is also commented on. A viability assessment is also included.	The representation advises a previous scheme, which was the subject of a planning application and shown to be unviable has been amended to reduce the overall costs of the development. It proposes that land is allocated in the Replacement Plan to allow Phase 1 (14 units) of this site to be developed, with a further 13 to follow once sewage capacity for the village has been increased. The representation was accompanied by a detailed cost estimate for 14 units, 4 of which would be provided as affordable dwellings. The costs provided were entered into the 2017 version of the	Rely on written representations.

						Wales Development Appraisal Kit (DAT) as closely as the toolkit would allow. The DAT found the development to be unviable by approximately -£300,000 per hectare. This is due to the low revenue of the development, assuming market values as per the St Brides sub market area, and over half-million pounds external works and sprinklers. **Conclusion:** Disagree.	
245.	**3813 Ms Davies**	**Chapter 4E Housing Brynhir, Tenby HA377 C41 Site No 112**	128 C41	'Objection'	To build on Brynhir is an unsound Plan and should be removed from the Plan. The loss of this last easily accessible green space and much used footpaths would be a huge blow to Tenby for locals and visitors. (please note Brynhir is allocated in the current Local Development Plan and not in the replacement Local Development Plan)	The site has not been allocated in the Deposit Plan. There are, however several objections – from Pembrokeshire County Council as landowners and Tenby Town Council to include the site as a residential allocation. Should a planning application for development of the site be submitted in the next few months then it will have to be considered in the context of the current Plan which includes the allocation. **Conclusion:** Comment noted. (However, please also see submission 2708 requesting the whole of site to be included)	
246.	**4600 - Mr and Mrs Davies**	**Chapter 4E Housing Tenby Candidate Site 112 Brynhir Tenby C41**	128 C41	Support	I would formally request that our support for the removal of the Brynhir site from the revised LDP to be noted by the relevant committees and decision making processes. Support for green wedge extension in the area is also supported. **No change requested.**	Support for not allocating Candidate Site 112 Brynhir, Tenby noted. **Conclusion:** Noted (However, please also see submission 2708 requesting the whole of site to be included)	Not advised.
247.	**4646 Mr Rhys-Phillips**	**Chapter 4E Housing Tenby Brynhir, Tenby**	128 C41	Support	Although understanding of the need to build housing the loss of these fields would be a grievous blow to the landscape and the wellbeing of those who benefit in so many ways from spending time there. (please note Brynhir is allocated in the current Local Development Plan and not in the replacement Local Development Plan)	Support for the non-allocation of Brynhir noted. **Conclusion:** Comment noted. (However, please also see submission 2708 requesting the whole of site to be included)	
248.	**4653 Ms Cormack**	**Chapter 4E Housing Solva/St Davids** 2 E Pg13 Affordable Housing and Housing Growth. New Site Allocation	128 PM4	Objection	Land to the North side of the road leading from St David's to Solva Grid reference (if known):Ordnance Survey Map Reference SM7825SW Proposal is for 5 affordable housing units Candidate Site Submission Form completed.	An assessment and sustainability appraisal have been undertaken for this site – See Site Reference 404 Consultation Report webpage, Post Deposit New and Amended Sites. The site is remotely located from any defined Centre or other groups of buildings. It is in the countryside and development here would be contrary to national and local planning policy. It would be visually intrusive and harmful to the Special Qualities of the National Park. It would not comply with the Preferred Strategy of the Replacement Plan. **Conclusion:** Disagree	Not advised
249.	**4653 Ms Cormack**	**Chapter 4E Housing Solva/St Davids** 2 E Pg13 Affordable Housing and Housing Growth. New Site Allocation	128 PM4	Objection	Land to the South of the A487 running between St David's and Solva Grid reference (if known):Ordnance Survey Map Reference SM7825SW Land to the south of the A487 running between St David's and Solva Candidate Site Form completed.	An assessment and sustainability appraisal have been undertaken for this site – See Site Reference 403 Consultation Report webpage, Post Deposit New and Amended Sites. The site is remotely located from any defined Centre or other groups of buildings. It is in the countryside and development here would be contrary to national and local planning policy. It would be visually intrusive and harmful to the Special Qualities of the National Park. It would not comply with the Preferred Strategy of the Replacement Plan. **Conclusion:** Disagree	

250.	**4446** **Atriarc Planning (Agent) on behalf of the Lort-Phillips Estate**	**Chapter 4E Housing Lawrenny** 044/044a and 045 Home Farm Lawrenny	128 C17		Vary Local Development Plan allocation to include development site proposed. Please see supporting statement. Detailed submission dealing with affordable housing and preliminary costings update,sustainability, the Design Commission Report, legal requirements and interlinked planning permission .	A planning application has been submitted for the development of this site for 39 dwellings, including 7 affordable homes. The application will be determined against the current Local Development Plan in which the land is allocated for residential development and therefore an update can be provided prior to examination. When considering whether to reallocate this land for residential use, the findings of the Land Implementation Study have been taken into account which concludes that the development would not be able to provide affordable housing. The landowner also submitted details about costs of developing the site during the Preferred Strategy consultation for the Revision Local Development Plan. The figures were entered into a development appraisal toolkit which concluded that the development was unviable. On this basis it was not considered appropriate to reallocate the land. **Conclusion:** Disagree.	Wish to speak at Examination in English
251.	**2906** **Saundersfoot Community Council**	**Chapter 4E Housing Tenby** De-allocation of Brynhir, Tenby	128 C41	Object	Saundersfoot Community Council also object to the de-allocation and exclusion of the Brynhir site from the Tenby settlement boundary and from the housing allocation table in policy 48.	Please see Main Issues Consultation Report for a response to this representation.	Wish to speak at Examination
252.	**1663** **Welsh Water**	**Chapter 4F Community Facilities etc.** Community Facilities & Infrastructure Paragraph 4.310	129	Support	We welcome the inclusion of water and sewerage infrastructure and sustainable urban drainage systems as areas where contributions may be sought by way of planning obligations, under supporting text 4.310.	Support noted.	
253.	**2025** **Home Builders Federation**	**Chapter 4F Community Facilities** Policy 53 Community Facilities and Infrastructure Requirements	130	Objection	The HBF consider the current policy wording to be over wordy and suggest that a lot of the policy wording could be in the supporting text making the policy shorter and clearer. The HBF have concerns over the prioritisation of the affordable housing requirement in S106 negotiations. Based on recent LDPS this is not something which is normally included in an LDP policy. If this is accepted by the Inspector then the HBF requests that the supporting text to the policy explaining how this might work in practise. Particularly when other requirements such as highway or school improvements will be required as a direct result of the scale and impact of the proposed development.	The policy (assuming the focus of the representation is on criterion c) is the product of advice from Welsh Government regarding the need to set out the priorities the Authority wish to pursue in viability negotiations. The Inspector's view on the approach is welcomed and whether some editing is needed. In terms of how this policy approach works in practice the Authority has since the last Local Development Plan was adopted used this policy approach. As the current supplementary planning guidance on planning obligations advises: paragraph 4.7 'Whilst the Local Planning Authority will consider all circumstances where viability issues mean that some planning contributions may need to be reduced or waived, in some cases where a development could not reasonably take place without a Planning Obligation, issues of viability will not result in such a Planning Obligation being relaxed (examples could include where flood alleviation is necessary or where the obligation is required to address issues of highway safety). These are circumstances where the absence of measures to address the needs created by an application would create such harm or risk that it is impossible for the development to take place without such provision. In some cases where it is accepted that certain contributions are not viable at a specific point in time, the Planning Obligation will require the issue of viability to be re-assessed if development (or a phase of development) has not commenced	Rely on written representations

						within a given time period.' **Conclusion:** Disagree	
254.	**2373 Theatres Trust**	**Chapter 4F Community Facilities** Policy 53 Community Facilities and Infrastructure	130	Support	Further to our previous representation, the Trust supports Policy 53 as it provides adequate protection for community facilities and we consider the justification to support any proposed loss to be appropriate.	Support noted.	-
255.	**2708 - Pembrokeshire County Council**	**Chapter 4F Community Facilities** Policy 53 Community Facilities and Infrastructure	130	Support	Support the general approach to maintaining and improving provision.	Support noted.	
256.	**2708 - Pembrokeshire County Council**	**Chapter 4F Community Facilities** Paragraph 4.327 Sustainable Transport	136	Objection	4.327 does refer to the rural nature of the NP however access to employment and education is the greatest trip generator and as such existing small scale facilities will only have a limited impact on trip patterns and as such linkages to multi modal options should always be sought. **For objections only - which tests of soundness does it fail?** Test 3 **Why?** Changes would help deliverability in a sustainable manner.	The principle of this statement is understood and accepted but application of allowing development only where there are multi-modal travel options available is likely to impact on the vitality and sustainability of many areas of the National Park where public transport provision has been limited by decreases in funding for such services. The lack of security of future funding for public transport would also impact on the long-term planning and sustainability of many Centres. The strategy therefore focuses on making best advantage of Centres having a range of facilities and services which can be sustained through the addition of housing, particularly affordable housing. Whilst these may not address the need to reduce travel to employment and education they will help to reduce the overall number of journeys made. **Conclusion:** Disagree.	
257.	**2708 – Pembrokeshire County Council**	**Chapter 4F Community Facilities** Policy 58 Impacts of Traffic	137	Objection	Reference to provision of private pay and display car parking facilities should also be made as the increasing provision of private car parking facilities outside of the control of the LA's has the potential to undermine sustainable transport options, the availability of car parking also has an influence on travel choice. **For objections only - which tests of soundness does it fail?** Test 3 Why? To improve clarity.	As set out in Planning Policy Wales (para 8.4.2) it is acknowledged that car parking provision is a major influence on the choice of means of travel and pattern of development. The difference between private and local authority parking provision is not clear. All car parking provision needs to be properly considered in the context of wider traffic and parking management, which is supported by Policy 57 of the Plan, the criteria in Policy 58 and the context of national planning policy. It is considered that the policy context has sufficient clarity. **Conclusion** – Disagree.	
258.	**2708 - Pembrokeshire County Council**	**Chapter 4F Community Facilities** Policy 58 Impacts of Traffic	137	Objection	Should 'significant trip generation' be defined? Perhaps by reference to Planning Policy Wales Chapter 8 (Jan 2016). Note Section 4.331 is specific and appears to have a much lower threshold than WG's guidance for the requirement of a Transport Assessment. **For objections only - which tests of soundness does it fail?** Test 2 **Why?** To improve clarity of meaning.	'Significant trip generation' is defined in paragraph 4.331 of the Plan. The reason for the lower thresholds is to reflect the generally rural character of the National Park and the smaller scale settlements within its boundaries. **Conclusion** – disagree.	
259.	**2708 - Pembrokeshire County Council**	**Chapter 4F Community Facilities** Policy 58 Impacts of Traffic	137	Objection	Policy 58 (c) suggests any traffic generated at these times is unacceptable. Is there a danger that this could, for instance, kill nightlife and act against (say) Tenby being an attraction for visitors? **For objections only - which tests of soundness does it fail?** Test 3 **Why?** Question the results of implementing this policy.	This policy has been used effectively in the Local Development adopted in 2010. The Annual Monitoring Reports have not identified any issues. In terms of individual proposals which may generate high levels of traffic, scope can and should be given to mitigating those effects, in accord with national planning policy and the need to protect the environment, residential amenity and road safety. **Conclusion:** Disagree.	

260.	**1663** **Welsh Water**	**Chapter 4F Community Facilities etc.** Utility Services	139	Support	We welcome the reference to water supply, quality and wastewater management under supporting text 4.336 and acknowledge that Policy 60 and the supporting text recognises that proposals for powerlines and pipelines lie outside the scope of normal development control.	Support noted.	
261.	**1092** **Lichfields (Agent)** **Bourne Leisure**	**Chapter 4F Community Facilities etc.** **Policy 60**: Powerlines and Pipelines	139	Object	Bourne Leisure considers that, although this draft policy provides protection against adverse effects on the special qualities of the National Park, it does not provide adequate protection for holiday accommodation against adverse impacts on visual amenity. A detailed submission is provided along with suggested wording.	The Local Development Plan is intended to be read as a whole. Policy 31 of the Plan provides policy advice to protect amenity. **Conclusion:** Disagree.	Relying on written representations
262.	**1092** **Lichfields (Agent)** **Bourne Leisure**	**Chapter 4F Community Facilities etc.** **Policy 61**: Telecommunications	140	Objection	Bourne Leisure's view is that it is important to consider the visual impact of any telecommunications development on holiday accommodation, as such development has the potential to affect the amenity of visitors and also the quality of the landscape. A detailed submission is provided along with suggested wording.	The Local Development Plan is intended to be read as a whole. Policy 31 of the Plan provides policy advice to protect amenity. **Conclusion:** Disagree.	Wishes to rely on written representations
263.	**2910** **St Davids City Council**	**Chapter 4F Community Facilities** St Davids Additional parking in St Davids	141 C39		The Council would like to see more land become available for parking in St Davids (either seasonal or full time) preferably within walking distance of the city centre.	No specific proposals have been presented. All car parking provision needs to be properly considered in the context of wider traffic and parking management, which is supported by Policy 57 of the Plan, the criteria in Policy 58 and the context of national planning policy. It is considered that the policy framework of the Local Development Plan can be used for consideration of speculative proposals coming forward. **Conclusion:** Disagree	Wishes to appear and speak English
264.	**2910** **St Davids City Council**	**Chapter 4F Community Facilities** **St Justinians**	141 PM4		The Council would like to see St Justinians included in the LDP because of the commercial activity and employment that takes place there and would like the LDP to reflect the need for parking and the need to maintain emergency access to the RNLI Lifeboat Station.	No site-specific proposals have been submitted with this comment. There are insufficient facilities and services at St Justinians to define it as a Centre. Parking and access to the RNLI Lifeboat Station is already available. The generic policies of the Local Development Plan provide the context for proposals coming forward in this location. See also response to the RSPB representation. **Conclusion:** Disagree.	Wishes to appear and speak English
265.	**1665** **RSPB**	**Chapter 4F Community Facilities etc.** New Policy proposed. Amendments in support proposed to: Policy 7 Countryside Policy 39 Visitor Economy (Strategy Policy) Policy 57 Sustainable Transport (Strategy Policy) Page 19. Key Issue: D. Visitor economy, employment and rural diversification.	141	Objection	The representor is seeking agreement, in principle, for parking provision at St Justinians. Representations sets out amendments to these policies along with a new policy on parking at St Justinians.	St Justinians is located on the coast, some 2km west of St Davids, overlooking Ramsey Island and Ramsey Sound. It is the home of the St Davids lifeboat, housed in a recently completed and state of the art boathouse, which is alongside two former boathouses, still owned by the RNLI. The location is picturesque and popular with visitors. Several companies operate commercial boat trips from the old RNLI slip, including trips landing on Ramsey Island, owned and managed by the RSPB. There has been pressure for additional car parking for several years at St Justinians, but in this highly sensitive landscape the Authority's position has been to encourage car parking within St Davids, and for visitors to walk, cycle or use public transport to St Justinians. An appeal against the refusal of a temporary car park at Rhosson (half kilometre inland from St Justinians) was dismissed in December 2017. Since then several boat companies have operated bus shuttle services from St Davids, alongside a public bus service subsidised by the National Park Authority. A policy, as suggested by the representor, to encourage parking at St Justinians would not be supported by the Authority. There is a cross-reference to the National Park Plan in the Local Development Plan (Paragraph 1.7). Policy 7: Support noted. The proposed amendment is not considered necessary as the rural enterprise or tourist attraction would be regarded as a whole including any 'associated essential	Rely on written representations.

		Sustainability Appraisal – Appendix C PPP.				supporting facility'. This proposed amendment would not be supported by the Authority. Policy 39: Management of recreation is generally not a land-use planning matter and is best considered through the National Park Management Plan. This proposed amendment would not be supported by the Authority. The proposed amendment to criterion e) would not be supported by the Authority for the same reason as detailed above for Policy 7. The representor has listed an amendment to Policy 57 of the Plan, however the wording which is the subject of the objection relates to Policy 58 of the Plan. The wording is included as a requirement of proposals which have significant trip generation and will have to be submitted with any planning application. The Authority would not support the deletion of this sentence. **Conclusion:** Disagree	