

Local Development Plan 2 Pembrokeshire Coast National Park – Focussed Changes - Consultation Report Addendum

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


 = representation of support


 = Main Issue not already listed in the main Consultation Report


Number	Reprentor – number and name	Focussed Change Reference	Support Object	Summary of Comment/Suggested Change by the Repreantor	Officer Response (Agree/Disagree/Compromise) Pre-Examination contact	Examination Written or Speak Welsh Language
1.	1569 Welsh Government	FC01 FC03		Focussed Changes (FC01 and FC03) propose to place the 'key diagram' in the Proposals Maps document, rather than the plan (written statement). The LDP Manual (edition 2, p15 and draft edition 3, p20) both clearly state the plan should contain a 'key diagram' as a diagrammatic map to spatially articulate the key elements of the strategy. This needs to be corrected.	If moving the Key Diagram from its current location in the Proposals Map Document to the Plan text meets the concern the Authority has no objection to this being addressed as a Matters Arising Change.	
2.	1569 Welsh Government	FC02 FC14 FC17	Objection addressed	Future growth areas The plan should only contain allocations which are deliverable within the plan period, not 'future growth areas'. We support the removal of 'future growth areas' which addresses our Deposit representation in this respect.	Noted.	
3.	1569 Welsh Government	FC06	Objection maintained	FC06 inserts a list of Welsh Language Sensitive Areas (WLSAs) into paragraph 4.80 of the plan. We do not support this change. As stated in our Deposit representation (Cat C, page 5) WLSAs should be listed within Policy 14 to clearly articulate which settlements are classified within WLSAs. The text in paragraph 4.80 states "the policy will normally apply in Community and Town Council areas with 19.2% of more Welsh speaking population". The authority need to clarify what "normally apply" means in practice?	If moving the list of Welsh language sensitive areas from its current location in para 4.80 of the Plan to within the Policy meets the concern, the Authority has no objection to this being addressed as a Matters Arising Change. Comment relating to 'normally apply' is noted.	
4.	3284 Mr & Mrs Merriman c/o Atriarc Planning	FC14 site HA4, land at Sandy Hill, Saundersfoot	Support	Outline of plans to develop Site HA4 subject to allocation being included in the adopted Local Development Plan 2.	Support and offer to speak at the Examination if requested by the Inspector noted.	Speak at Examination if requested in English
5.	1569 Welsh Government	FC15	Objection maintained	Our Deposit representation (Cat B, page 3) identified a number of issues and inconsistencies in the components of housing land supply which remain in the Focussed Changes document and require addressing. The Focussed Changes amends the table of 'Components of Housing Land Supply (Table 5). The Housing Background Paper has also been updated (November 2018). There are several inaccuracies between the two. The table below summarises these discrepancies which must be addressed.	Row A: Appendix 3 to the Background Paper has been amended to accord with Table 5 in FC15. Row C: Appendix 2 and 3 have been amended to accord with Table 5 in FC15. Row D: Appendix 2 and 3 have been amended to accord with Table 5 in FC15. Row E: Appendix 2 and 3 and Table 5 FC15 all use the number 177. Row F Appendix 2 and 3 and Table 5 FC15 all use the number 283. The Deposit Plan column will be different as these figures have been amended in the Focussed Changes to address Welsh Government objections in line with Welsh Government advice.	


	Deposit Plan (May 2018)	Proposed Focussed Changes (Dec 2018)		
	Table 5	Table 5 (FC15)	Housing Background Paper – Appendix 3 Trajectory (updated Nov 2018)	Housing Background Paper - Appendix 2 (updated Nov 2018)

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				<table border="1"> <tr> <td>Row A Total completions</td> <td>46</td> <td>154</td> <td>176</td> <td></td> </tr> <tr> <td>Row C Units with planning permission</td> <td>149</td> <td>147</td> <td>166</td> <td>169</td> </tr> <tr> <td>Row D Allocations</td> <td>502</td> <td>389</td> <td>367</td> <td>367</td> </tr> <tr> <td>Row E large windfalls</td> <td>132</td> <td>177</td> <td>180</td> <td>177</td> </tr> <tr> <td>Row F small windfalls</td> <td>318</td> <td>283</td> <td>286</td> <td>283</td> </tr> <tr> <td>Total provision</td> <td>1147</td> <td>1150</td> <td>1175</td> <td></td> </tr> </table>	Row A Total completions	46	154	176		Row C Units with planning permission	149	147	166	169	Row D Allocations	502	389	367	367	Row E large windfalls	132	177	180	177	Row F small windfalls	318	283	286	283	Total provision	1147	1150	1175		<p>The Background Paper can be amended to refer to a 20% flexibility allowance. Appendix 3 calculations shows what a 15% allowance looks like so this would need to be amended too. The appropriateness of the flexibility allowance will no doubt be an area for discussion at Examination.</p> <p>In terms of the trajectory in Appendix 3 Appendix 2 provides the source information for the allocations. In terms of the factors taken into consideration when identifying the likely progression of sites and the likely number of residential units to be developed (including affordable housing) the Authority has relied primarily upon:</p> <ul style="list-style-type: none"> - The latest evidence in the most recent Land Availability Study 2018 (for those sites already allocated in the current Local Development Plan or with planning permission) - The latest advice available through pre-application discussions on sites allocated in the current Local Development Plan. - The Land Implementation Study prepared for the Authority on the sites. - The rates of development historically experienced in the various Centres around the Plan area. - The usual lead in times for progressing allocations to planning application stage and then 	
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				<p>Row A – Total completions There is a substantial discrepancy between the Focussed Changes document (Table 5) and the updated Housing Background Paper (Appendix 3) during the first three years of the plan period. Accurate figures must be provided, in line with the Joint Housing Land Availability Study (JHLAS).</p> <p>Row C - Units with planning permission The number of units with planning permission (base date April 2018) requires clarification.</p> <p>Row D - Allocations The allocated housing total needs to be clarified. This should be supported by robust evidence on delivery and phasing.</p> <p>Rows E and F - Windfall allowance The small and large windfalls components need to be clarified.</p> <p>Total provision and Flexibility The plan makes provision for 1,150 units to deliver 960 homes, which remains unchanged from the Deposit plan. This equates to a 20% flexibility allowance to account for non-delivery and unforeseen issues. The evidence in the Housing Background Paper (paragraph 96) refers to a flexibility allowance of 15%. This discrepancy needs to be rectified.</p> <p>Housing Trajectory (Housing Background Paper, Appendix 3 Land Availability) The housing trajectory should be based on the phasing and build rates on an annual basis for the entire plan period. At present it appears to include a 'flat rate' for the delivery of commitments, landbank sites and allocations in 3 to 5 year tranches, rather than annually. It remains unclear as to how sites have been assessed in terms of phasing across the plan period, which needs to be rectified. The housing trajectory must be embedded in the plan as an appendix to inform the monitoring framework. All components of the housing provision need to be accurate before the plan can be adopted.</p>																																

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					forward to development. The Authority does not have the evidence to advise on a yearly basis (except where developments are about to commence and in some cases these plans change too). These are estimates for the long term and cannot be guaranteed.	
6.	1569 Welsh Government	FC15	Objection maintained	Our Deposit representation (Cat B, page 3) highlighted inaccuracies and inconsistencies in the housing figures which remain unaddressed in respect of affordable housing. FC15 states the plan can deliver 359 affordable homes but this figure does not align with the target of 250 units.	Table 6 has been derived in the same manner as Table 5 for market and affordable housing. It is therefore an estimated provision figure rather than a target. The Authority's response to the Deposit representation explains why.	
7.	4161 RLH Architectural Design Solutions	FC16	Update	Update regarding delivery of Allocation HA2 1. The Affordable Housing element on the site is currently under construction. This should be complete by the end of the year. 2. The market housing (the old pottery part of the site) – This was sold by Mr M Smith to another developer. So Mr Smith, to the best of our knowledge has no further interest in the site. We do not know the intended timescales for delivery on the private housing on this site. We are no longer engaged as agents on this development.	Update regarding the delivery of development of the affordable housing is noted. The advice on the affordable housing provision is consistent with Appendix 2 and Appendix 3 of the Housing Background Paper and the allocations table for the Local Development Plan.	
8.	1487 ateb	FC16 HA7 West of Glasfryn Road St Davids	Update	Feedback on when the site is likely to be developed: Scheme was granted planning approval December 2018 with the intention to begin construction earmarked for summer 2019. A local group opposing the planning decision have lodged a Judicial Review request against the planning approval with the Courts. Decision taken to replace this scheme within development programme, with Glasfryn Road now becoming a reserve scheme. Still determined to deliver the affordable housing scheme at St Davids.	As a result of the High Court Challenge (now not being pursued) affordable element listed as a 'reserve scheme'. Appendix 2 shows 35 to 2021 and 35 to 2026. A further update can be provided to the Examination.	
9.	1487 ateb	FC16 HA12 Field Opposite Manorbier VC School, Manorbier Station	Update	Feedback on when the site is likely to be developed: Local Authority support along with Welsh Government approval were received in November 2018. The scheme sits in our 2020/2021 Development Programme with a construction start anticipated in autumn 2020.	Scheme sits in Ateb 2020/2021 programme (financial year) with start Autumn 2020. Appendix 2 of the Housing Background Paper shows it being completed by 2021 which would be consistent with this advice.	
10.	4465 Mr & Mrs Arwel Evans c/o Hayston Developments & Planning Ltd 	FC16 Site Reference No. 88A HA3 Land North of Business Park, Newport		Propose changes to phasing and potential extension of the housing site at Newport – North of Business Park.	The Authority's view on including a larger area for development remains unchanged from the Candidate Site assessment published alongside the Deposit Plan. No objection to the Deposit Plan was received regarding this. In terms of identifying the timescales for the allocated site's likely development the Authority has relied primarily upon: - The Land Implementation Study prepared for the Authority on the sites. - The rates of development historically experienced in the various Centres around the Plan area. - The usual lead in times for progressing allocations to planning application stage and then forward to development.	Examination Speak in English

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					As the agent is proposing to appear further evidence on this matter can be discussed.	
11.	John Meyrick c/o Hayston Developments & Planning Ltd 	FC16 Site Reference No. 86 HA11 West of The Green, Lydstep		<p>Phasing and potential extension of the housing site at Lydstep. Concern with the reduction from the proposed 24 to 10 units and the suggested timetable for delivering the envisaged properties on the grounds of:-</p> <p>a) Failing to deliver much needed market housing and affordable housing in the Lydstep / Tenby area, and</p> <p>b) Creating a situation whereby the viability of delivering only 10 units, and then not until 2026, is jeopardised through having to incorporate a disproportionate amount of the abnormal/unforeseen costs anticipated for this site into a lesser amount of units.</p>	<p>No objection was received regarding this proposed site when the Plan was placed on Deposit.</p> <p>The Authority's assessment of the candidate site at Deposit stage remains unchanged.</p> <p>The issues raised regarding viability are queried.</p> <p>The viability assessment carried out by the Authority (Arcadis Study) includes an allowance for infrastructure in build costs). In terms of foul drainage upgrade works £300,000 – Welsh Water has advised there is adequate capacity available at the STW.</p> <ul style="list-style-type: none"> <input type="checkbox"/> Foul drainage off-site connection £100,000 – the Authority has consulted Welsh Water on this and will be in a position to provide further advice at Examination. <input type="checkbox"/> Pedestrian link £50,000 - Advice from the Highways Authority is that a footway link at the entrance to the site and a pedestrian link to the Green would likely to be in the region of £5,000 which would already be contained within normal site development costs. <input type="checkbox"/> Ecology work £50,000 – this will be included in professional fees. <input type="checkbox"/> Off-site surface water works £100,000 Sustainable drainage proposals will need to be on site. 	Examination speak in English
12.	1569 Welsh Government	FC16	Objection partially addressed	<p>The Deposit plan appeared to include units on the 16 allocations which were delivered beyond the plan period which is inappropriate. Focussed Change (FC16) reduces the number of units delivered on housing allocations (Policy 48) over the plan period from 525 to 479. The reduction of 46 units is due to the removal of units that would be delivered beyond the plan period which we support.</p> <p>However, as highlighted in the Housing Component table above, the number of units on allocated sites does not equate to 479 dwellings. This needs to be rectified, based on robust phasing assumptions across the whole plan period.</p>	The housing allocations table totals 526 of which 59 are programmed for delivery outside the Plan period. This leaves 467 of which 78 units have permission which is why the components table (Table 5) has a figure of 389 for the allocations. The 78 units are in the planning permission row as requested by Welsh Government.	
13.	1569 Welsh Government	FC16 FC23	Objection partially addressed	<p>The Affordable Housing Viability Study had not costed the impact of sprinklers at £3,100 per dwelling. The updated Housing Background Paper (Appendix 4, November 2018) has now included the cost impact of sprinklers in sub-market areas and site specific allocations. We support this update to the viability work.</p> <p>Some of the affordable housing targets have been amended with separate targets on allocations and in sub-market areas. Whilst we do not disagree with the principle of this split approach it will be for the LPA to explain.</p>	Noted.	
14.	4663 Harries Planning Design Management (Morgan)	FC16 HA1 Land North of Feidr Eglwys, Newport	Update	<p>Progress update regarding delivery of development on HA1 Land North of Feidr Eglwys, Newport.</p> <p>As you are aware, the site received the benefit of full planning permission for the erection of 35 units (14 affordable), under reference NP/15/0194/FUL. The</p>	Amendments to Appendix 2 and 3 of the Housing Background Paper can be made if the outcome of the S73 is known in time for the Examination.	

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	Construction)			<p>allocation within the replacement plan follows the unit number and affordable housing share of this permission. Since the granting of permission in June 2016, relevant conditions have been discharged to enable the commencement of development, which has now begun on site. The contractor has informed HPDM that it is anticipated to build out the site in a continuous staged approach, including the affordable units, for which Wales and West Housing has secured ownership and management responsibilities. It is anticipated that the whole site will be completed within 12-18 months.</p> <p>This is, however, subject to the approval of required non-material amendments and a Section 73 application in relation to 3 market units (to change from bungalows to 1.5 storey) by the Authority. A non-material amendment application is currently being considered by the Authority and pre-application discussions have taken place with the Officers in relation to all other outstanding matters, with a view to submit the relevant applications shortly.</p>		
15.	4449 Sian James c/o Harries Planning Design Management	FC16		<p>The stated "Estimate Affordable housing Figure (Allocation" unit number for HA16 Land off Cefn Gallod, Trefin has not been updated to take account of the revised 25% affordable housing requirement. This would amount to 2 units when rounded down to the nearest whole unit number and should be amended accordingly.</p> <p>The Housing Background Paper (Nov 2018) Appendix 2 Housing Land Supply as at April 2018 (by site) should also be amended accordingly to reflect the 25% requirement.</p>	Agree. The Authority would not object to a matters arising change as suggested. There would be consequential changes needed as suggested to Appendix 2 if the Inspector is in agreement.	Written
16.	3372 Raymond 	FC16 FC23	Object	<p>Policy 48 so far as it relates to site HA9 Broad Haven Land North East & South East of Marine Road would render PCNPA Local Plan 2 Unsound in that the Plan is not appropriate in the light of the evidence and the Plan will not be effective since it will not be deliverable. The increase in the level of affordable housing from 10% to 34% in Focussed Change 16 so far as it relates to site HA9 renders the site nonviable and therefore undeliverable. Footnote *2 to Focussed Change 16 in relation to site HA9 Add footnote: pre-application discussions/Local Development Plan viability information.</p> <p>Indicative Affordable Housing Requirement "34%" should be deleted and replaced by "20% subject to viability testing"</p>	<p>The more detailed viability information that was supplied at candidate site stage to the Authority and confirmed during pre-application discussions in May 2018 would suggest that a figure of 34% is achievable in principal.</p> <p>The more detailed viability information received referred to above can be provided for the Examination.</p>	Written
17.	1569 Welsh Government	FC21	Objection maintained	FC21 inserts the plan target of 250 affordable homes in the reasoned justification (paragraph 4.291). The target needs to be in Policy 49.	If putting the affordable housing target in Policy 49 meets the concern the Authority has no objection to this being addressed as a Matters Arising Change.	
18.	1569 Welsh Government	FC21	New objection	FC21 identifies a plan target of 250 affordable homes linked to the plans housing provision. The target should be based on the housing requirement of 960 units, not the provision. As worded, it is unclear if this is the case.	See above and footnote to Policy 48 –Footnote 155.	
19.	1569 Welsh Government	FC22	Objection addressed	FC22 introduces affordable housing targets for each sub-market area in Policy 49. This change is supported.	Noted.	

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20.	3511 Tenby Civic Society	FC23 – FC27 PD417 ¹ .		<p>We welcome the many additions made to open space designations in Tenby as a result of our representations. Two questions as to soundness arise from the Focussed Changes.</p> <p>First our site surveys show different boundaries for a few sites (PD414 and PD415), to those the Authority showed on the OS plans. Corrections and one site addition will complete the soundness of the Open Space allocations for Tenby. Second some of our peripheral sites used as open space have been left out (Adj 93 The Glebe, Rosemount Gardens, Old and New Cemeteries and Allens View); the soundness is in question as they fit Assembly types of openspace, TAN16 Annex B.</p>	<p>The Authority would not have an objection to the amendments to the boundaries of PD414 (entrance to the Glebe) and PD 415 (entrance to the Glebe) proposed by the Tenby Civic Society being considered as Matters Arising Changes.</p> <p>Tenby Civic Society's proposal regarding Rosemount Gardens was originally submitted as a Deposit representation. The Authority's view on not including the site remains unchanged – see Deposit Plan response.</p> <p>Tenby Civic Society's proposal regarding the cemeteries and Allen's View were submitted as a Deposit representation. The Authority's view on not including these sites remains unchanged – see Deposit Plan representation.</p>	
21.	1569 Welsh Government 	FC23	New objection	The thresholds at which the targets will apply have also been amended. We understand this is based on the ability to deliver 1 affordable unit on site and not whether the threshold is viable. This approach will be for the LPA to explain.	Noted.	
22.	2708 PCC (Highways)	FC27 PD411(Welcome to Tenby Island Verge)	Object	The area cannot be registered as open space as it is part of the adopted highway.	<p>This comment and information is noted. As a result of this representation it is proposed that this parcel of land should not be shown as open space.</p> <p>It is proposed not to progress this particular Focussed Change.</p>	
23.	1663 Dwr Cymru Welsh Water	FC9	Support	<p>We have no specific comments to make other than to state that we agree with provisions of Change No. 9 in light of the recent establishment of SuDS Approval Boards (SABs), as set out in the Flood and Water Management Act 2010 (Schedule 3).</p> <p>The requirement for new developments to obtain SAB consent may result in layouts and densities changing in some housing developments, but the onus is on landowners/developers to consider SuDS prior to master planning their site which will ensure there is no need to retrofit schemes into the design at a later stage. We therefore welcome the inclusion of reference to it within the LDP.</p>	Noted.	
24.	2577 National Grid	None	Not advised	No comment. Willing to provide further advice if needed.	Noted.	
25.	3617 Coal Authority	None	Support	We have no specific comments to make in respect of the focussed changes proposed.	Noted.	
26.	1670 Natural Resources Wales	None		We have reviewed the focused changes document and have no comment to make.	Noted.	

¹ Reference appears to be in error.

