

#### Question 4 - Comments made on the Equality Impact Assessment

Representor – number and name	Commenting on:	Include Remove Amend	Comment	Officer Response and Recommendation
<b>4579 Mr &amp; Mrs Sharp (D Haward)</b>	0 General		No adverse comment	Noted.
<b>3882 Mr R Wigley- Jones (David D Haward)</b>	0 General		No adverse comment.	Noted.
<b>4576 Mr Bowen (Asbri Planning)</b>	0 General		No adverse comment.	Noted
<b>4583 Mr G Elmes</b>	0 General		No change needed.	Noted.
<b>4436 MR R Sutherland (Acanthus Holding)</b>	Site 018	Amend	<a href="#">4436Sutherland.pdf</a>	Negligible scoring in sustainability appraisal based on number of factors, not only the 8% increase and including issues relating to no control of residency for whole occupation.
<b>3251 Dr &amp; Mrs Davies) Acanthus Holden</b>	Site 027	Amend	<a href="#">3251Davies-Penberry.pdf</a>	Negligible scoring in sustainability appraisal based on number of factors, not only the 8% increase and including issues relating to no control of residency for whole occupation.

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<b>3372 Raymond and Raymond (Paul Hales)</b>	0 General		No adverse comment	Noted.
<b>4538 Mr &amp; Mrs Armitstead</b>	4a 4b 4c	No No No	-	Support for approach noted.
<b>2916 Tenby Town Council</b>	4a 4b 4c	No No No	-	Support for approach noted.
<b>2708 Pembrokeshire County Council</b>	Page 35 Item j)		Approval for deregistration of the Common was received from Welsh Government in December 2015 and work is now progressing towards the submission of a planning application and a grant funding application for the Gypsy and Traveller site extension at Kingsmoor Common.	Noted.
<b>2708 Pembrokeshire County Council</b>	Page 49		In the right hand column, the statement is made that ‘as planning authority a requirement to include self-build proposals is not possible, although these can be pursued by landowners / developers’. The following sentence adds that ‘it is difficult to obtain mortgages for such proposals’. Is the basis for the first statement that there is uncertainty	It is advising that the planning system cannot require a proposal for housing to be a self-build proposal. Mortgages are an additional issue.

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			over deliverability because of the potential difficulty in securing finance?	
<b>2708 Pembrokeshire County Council</b>	Pages 68, 69 and 84		Regarding the re-wording of the title to Policy 46, should reference also be made to Travelling Show-people?	Agree to amending title. Amendment done.
<b>3468 Ms Mary Sinclair, Campaign for Protection of Rural Wales</b>	a)		No	Support for content noted.
<b>3468 Ms Mary Sinclair, Campaign for Protection of Rural Wales</b>	B)		<p>CPRW Comments  <b>Wales Government Toolkit for Planners 2015 – Planning for Renewable and Low Carbon Energy</b></p> <p>In preparing this draft of the Local Development Plan replacement it appears that the up-dated <b>Wales Government Toolkit for Planners</b> has not been used. Powys are using it to guide their LDP. We expect consistency throughout Wales especially where it gives greater protection to residents from intrusive developments.</p>	The 500m buffer zone referred to in the Toolkit relates to large scale installations or a turbine with an output of 2MW. Reference No. 41 within the Toolkit states that this was the figure used for the assessment of Strategic Search Areas contained in Technical Advice Note 8. Similarly the reference to 7km distance between turbines is in relation to large scale unconstrained wind resources. There are no Strategic Search Areas identified within the National Park and this scale of turbine development would not be considered appropriate within the National Park landscape or its outliers. For small scale turbine development, defined as turbines under 25m to blade tip in the

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			<p>With regard to wind energy installations for example, <b>the Toolkit</b> identifies the following:</p> <p>Page 145 places a restraint on all wind clusters of 7km apart.</p> <p>Page 139 it identifies a Buffer zone of 500m between wind turbines. And any residential property.</p> <p>Unless a Buffer Zone is included in Policy 33, a necessity recognised by LPAs elsewhere in Wales, the residents of the National Park will be severely disadvantaged.</p>	<p>supporting table to Policy 33 within the Local Development Plan Preferred Strategy, each case will be determined on its merits, against the relevant ETSU Guidance, with regard to noise impact upon neighbouring properties. It is not considered appropriate to apply a blanket buffer zone distance in this respect as it could prohibit suitable small scale schemes being developed.</p>
<b>3468 Ms Mary Sinclair, Campaign for Protection of Rural Wales</b>	b)		<p><b>Updated Agricultural Land Classification and Division of grade 3 into 3a (BMV land) and 3b.</b></p> <p>Work on this upgrading is now well advanced. The LDP should use the new and more sophisticated Predictive maps being produced to up- grade Land Classification data. Otherwise BMV land will be seriously at risk. We understand also that some LDPs in process are already taking note of this upgrading of data. The ability of the National Park to grow local food for local</p>	<p>Comment noted. The assessment of sites for development includes an appraisal of agricultural land value.</p>

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			residents could be compromised if the Predictive maps now being produced are ignored. Keeping to the old Provisional maps which did not divide grade 3 is unsustainable	
<b>3468 Ms Mary Sinclair, Campaign for Protection of Rural Wales</b>			<p><b>Language and Culture</b></p> <p><b>Welsh language decline</b></p> <p>CPRW Comments.</p> <p>CPRW is dismayed by the decline in Welsh speakers within much of the National Park. South Pembrokeshire is noted as an English Speaking area but residents should be encouraged to view Welsh positively as it is a part of a bi-lingual country. Of great concern is the decline in the north of the National Park.</p> <p>Policy 12 attempts to prevent further decline in some areas but what is needed is positive promotion of Welsh culture first within the English speaking area of south Pembrokeshire, and then the language in those areas where less than 30% speak Welsh.</p>	Policy 14 is in accordance with the scope of what a planning authority can do under national planning policy as set out in Planning Policy Wales and TAN20: Planning and the Welsh Language.

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			<p>In a bi-lingual nation, those speaking only one of the languages are culturally and economically disadvantaged. This decline needs to be reversed</p> <p><b>The South Pembrokeshire Culture</b> with its own often unique words is also being lost.</p>	
<p><b>3468 Ms Mary Sinclair, Campaign for Protection of Rural Wales</b></p>	<p>c)</p>		<p>Yes We are asking you to amend Policy 33 to add to the end of the Policy statement the word: To protect residents and tourism within the National Park a Buffer Zone will be required in lien with Wales Planning guidance.</p> <p>Leaving protection of residents' interests to the word 'amenity' is not enough, when in other areas in Wales they are protected by a Buffer zone.</p>	<p>The 500m buffer zone referred to in the Toolkit relates to large scale installations or a turbine with an output of 2MW. Reference No. 41 within the Toolkit states that this was the figure used for the assessment of Strategic Search Areas contained in Technical Advice Note 8. Similarly the reference to 7km distance between turbines is in relation to large scale unconstrained wind resources. There are no Strategic Search Areas identified within the National Park and this scale of turbine development would not be considered appropriate within the National Park landscape or its outliers. For small scale turbine development, defined as turbines under 25m to blade tip in the supporting table to Policy 33 within the Local Development Plan Preferred Strategy, each case will be determined on its merits, against the relevant ETSU Guidance, with regard to noise impact upon neighbouring properties.</p>

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				It is not considered appropriate to apply a blanket buffer zone distance in this respect as it could prohibit suitable small scale schemes being developed.
<b>3617 The Coal Authority (M Lindsley)</b>	General		No amendment needed.	Noted.
<b>4556 D &amp; M Williams</b>	General		No amendment needed.	Noted.
<b>2910 St Davids City Council</b>	St Justinian's	<b>Include</b>	Consistent with our answer in relation to Question 1, the City Council remains concerned about the lack of suitable parking and toilet facilities at St Justinians and in relation to Question 4 and the Equality Impact Assessment, how people who are protected under the Equality Act 2010 can have appropriate and necessary facilities in the St Justinians area.	In principle Policy 53 Community Facilities and Infrastructure Requirements supports provision of community facilities outside built up areas as long as they are suitably located. The provision of improved facilities in St Justinian's area is dependent on suitable proposals coming forward. The Authority is working with Pembrokeshire County Council and the community to find a sustainable solution for access to St Justinians and will include full consideration of accessible parking provision.
<b>3820 D Hoare</b>	Site 142 and Site 097 St Davids		Question 4 Safeguarding of children @ Ysgol BD from people on sex offenders register	This issue lies outside the scope of planning land use policy for generic market housing allocations.

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			in such close proximity to the school this happened in Bishops Castle Shropshire.	Should a specific proposal be received for housing of this nature, the appropriateness of the location would form a material planning consideration.