

FROM: DAVINA GAMMON .NUMBER 3182

Stone's Throw, Jameston.

RESPONSE TO THE INSPECTOR'S SCHEDULE OF MATTERS , ISSUES AND QUESTIONS

Matter 1.7.f

1.The requirements of Policy 6 are not clear

The conditions set out in Policy 6 should be mandatory if they are to be effective.

Policy 6e states the 'priority' will be 'To ensure developments permitted contribute to the protection and enhancement of the special qualities of the Centre. '

a] This statement is far too general. It needs to be specific about what is meant by 'development' , about what is meant by 'enhancement' , about what is meant by 'protection'. By whose judgment are these conditions to be met? The LDP should set out a system of decision making. It should set out a system where decisions made can be appealed at an early stage to an independent committee, which has an unfettered power to examine the decisions of PCNPA and to rescind the decisions of Planning Officers where necessary. The current system where appeal is only available to the High Court does not function and is unfair. Potential appellants are daunted not only by the difficulty of this procedure but by the real danger of an order for costs against them if the appeal fails. The provision that at the stage where the developer applies to the Planning Committee people who oppose the application may address the committee [ for a maximum of 5minutes] does not work. If the application is supported by the PCNPA Officer the committee is unlikely to oppose an application.

Matter 1.7. g

The requirements of Policy 7 are not clear

The LDP should be clear about the meaning of the terms it uses.

a] It states that development in the countryside must be strictly controlled. It then lists 14 circumstances in which it need not be strictly controlled.

b] If Policy 7 is to have any force the grounds on which the breach of its conditions are allowed must be strictly proved and the LDP should state that.

c] Under Policy 7.j the plan states that exceptionally land will be released for affordable housing to meet an identifiable local need. The plan needs to be specific about how this condition is to be identified and what the definitions of 'local' and 'need' are. Those should be defined. Is it local to the village or is it local to the PCNPA? The means by which such need is to be proved needs to be defined. Policy 49 does not help

d] At paragraph 4.60 a passing reference is made to the protection of good agricultural land. This Plan does not follow the national policy on protecting good quality agricultural land.

### Matter 8 .a

a] The approach to site selection is insufficiently clear and is not founded on a robust evidence base. Sites are selected for the LDP on what appears a random basis.

b] 'Need' is alleged to allow the exceptional release of land which should be protected from development. The history of the allocations for housing in Jameston under the current LDP is as follows and does not support the contention that there is a need for housing in Jameston such as to support the exceptional release of land.:

The small development at site 436 in Jameston was in the JUDP , no development took place during the life of that Plan, it was then in the succeeding LDP in 2010 . PCNPA states that it has now some 13 years later been completed. The plots could not be sold. 3 of the 7 houses now being built are nearing completion on this site, they are for sale. 4 are finished and occupied .Site 821 in the LDP in Jameston is now being developed , I understand the owner has gifted most of the sites for affordable housing. They were on the open market for several years with no interest shown. Site 730 in the LDP since 2010, HA10 in the Replacement LDP , has not been developed at all. The plan recently submitted by Landway Properties is totally unsuited to the location . It requires the destruction of the ancient right of way from Jameston to Manorbier and of one of the few remaining ancient stone walls in an area which abounded in them. I understand that recently PCNPA have had a change of heart and may support the retention of the wall. The decision by PCNPA to include this land in the current LDP was wrong and to have included it in the Replacement LDP is clearly wrong , has no regard to the strictures of Planning Policy Wales, ignores The Sandford Principle and is unsound.

c] Focussed changes now again make reference to a substantial planting belt to screen this development from the Manorbier Historic Landscape and from the Pembrokeshire Coast Path. This was a condition in the existing LDP but ignored by the developer in his plan.

### Matter 8b

a] It was a condition of the current LDP that a survey of the capacity of Manorbier Pumping Station be carried out before any development of this site . I understand that Tenby Pumping Station which will receive the effluent from this development from Manorbier has a increased capacity but no improvements have been made to Manorbier.

b] The electricity supply to this locality is by overground electricity cables on poles. The plan for site HA10 shows houses being built over the route of those poles. It is not clear how advanced plans are to put the supply underground or who will pay for the cost of that.

c] Site HA10 has the busy main road on the North side of the site, otherwise the locality is served by narrow single track lanes . They are a feature of this area and so far have survived and should be preserved. The influx of 200 additional people and their vehicles will threaten their survival.

There has been no adequate consideration of the infrastructure requirements . The Plan is unsound .

### Davina Gammon.

The Jameston Campaign .23.06 2019.

Number 3182

FROM: DAVINA GAMMON

JAMESTON CAMPAIGN

## **RESPONSE TO THE INSPECTOR'S SCHEDULE OF MATTERS, ISSUES AND QUESTIONS**

### Matter 2 .1

LDP 2 pays lip service to the Sandford Principle and to the need to preserve and protect the natural assets of the Pembrokeshire Coast National Park but it does not provide but it does not provide a system for scrutinising the decisions of those charged with that task. It should do.

### Policy 8

a) States that the **priorities** will be to preserve the sense of tranquillity and remoteness in the National Park and **wherever possible** to enhance it. The wording should be mandatory not discretionary. The aim of Policy 8 seems to be subservient to Policy 9 which permits lighting schemes where needed as long as they are not 'unacceptable'. It does not say by whose judgment a scheme is unacceptable. A scheme which is unacceptable to those whose enjoyment of the tranquillity and darkness of the night sky is destroyed will be perfectly acceptable to someone living in one of the bigger towns or villages. I suggest that PCNPA must be required to consider at an early stage if a development the authority is minded to support will need lighting schemes which intrude into tranquil and dark locations and reject the development if it does.

b) The Plan needs to be more precise. Criteria should be laid down specifying on what grounds a condition said to be a priority can be breached. If there are grounds credible and compelling evidence should be produced to prove they exist.

c) The Plan makes no specific provision for the way in which the authority will ensure the Special Qualities of the National Park are preserved. Policy 8 is no more than a list of aspirations which can be ignored at whim. Describing these aspirations as merely 'priorities' and using the words 'wherever possible' repeatedly, leaves a wide discretion to those deciding whether to allow a development. The preservation of the undeveloped countryside should be stated to be mandatory.

d) Large and increasingly larger numbers of people come to Pembrokeshire from all over Britain and all over the world to enjoy the landscape which is currently under threat from unnecessary housing developments. This Plan does not protect that precious landscape.

e) Policy 8e does not make clear how it is alleged that development assists the preservation of ecosystems and is unconvincing.

f) Policy 9 is in contradiction to the aim to preserve tranquillity and remoteness which Policy 8 aspires to achieve. It is unsound.

### Matter 2.5

Policy 15 is not clear.

The Policy ought to state that development will not be permitted where it affects buildings of local importance. The current wording is imprecise and implies a prejudice in favour of such development.

Davina Gammon

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