

Question 3 - Comments made on the Sustainability Appraisal

Representor – number and name	Commenting on:	Include Remove Amend	Comment	Officer Response and Recommendation
4579 Mr & Mrs Sharp (D Haward)	Site 105		Please correct the appraisal of this site and identify it as a candidate site. 4579Haward.pdf	Please refer to response under Question 2 for Representor Number 4579.
4576 Mr Bowen (Asbri Planning)	Policy 6	Remove	Under Policy 6 assessment removal of reference to WSP approach as this is of decreasing relevance to the determination of a settlement hierarchy locally. It dates from 2004 and will be replaced by the emerging National Development Framework.	The Wales Spatial Plan is still of relevance.
4576 Mr Bowen (Asbri Planning)	Site 073	Include Amend	Amendments to Candidate Site Appraisal 073 Changes suggested in submission Document – Appendix 5. 4576ABowenRep.pdf	The additional information submitted does not change the outcome of the sustainability appraisal of the site.
4583 Mr G Elmes	0 General		No change needed.	Noted.
4436 Mr R Sutherland (Acanthus Holden)	Site 018	Amend	4436Sutherland.pdf Please refer to attached letter.	The representor makes reference to the Authority’s Settlement Capacity study and concludes that the site can be extended southwards with planting along the southernmost boundary of the site which would be in line with the existing isolated bungalow known as Hafod.

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				<p>The Settlement Capacity Study clearly states that the <u>lower</u> part of the field (already allocated and with planning permission) is appropriate for development. The land plateaus at Hafod and the views across the surrounding countryside are extensive. the representor suggests a soften of the boundary with additional planting, but this section of coast is very exposed to the predominant strong westerly winds and in combination with the salt-laden air restricts tree and shrub growth. There are also objections from the Highway Authority in terms of pedestrian linkage to the village which has proved to be problematic to achieve since the granting of planning permission on the northern part of this site. Recommend no change to the site assessment.</p>
<p>3251 Dr & Mrs Davies) Acanthus Holden</p>	<p>Site 027</p>	<p>Amend</p>	<p>3251Davies-Penberry.pdf Please refer to attached letter.</p>	<p>Reference to the site being within the curtilage of an existing dwelling can be included within the assessment. The right of access across the neighbouring property has recently been considered by the Authority when an unauthorised roadway was created. A subsequent retrospective application for the works was refused. The refusal</p>

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				included the access being unsafe on highways grounds. The site is adjacent to a TAN15 Zone B flood risk zone as shown on the Natural Resources Wales Development Advice Map (2017). Whilst factual changes can be made to the assessment it does not alter the overall outcome that the site is not considered compatible with the Preferred Strategy of the Plan.
3372 Raymond and Raymond (Paul Hales)	0 General		No adverse comment.	Noted.
4538 Mr & Mrs Armitstead	3a 3b 3c	No Yes No	-	Noted.
2916 Tenby Town Council	3a	No	-	Support for approach noted.
2916 Tenby Town Council	3b	Yes	Further action to ensure the vitality and viability of Tenby Town Centre by the retention of retail opportunities. A one third/no more than three in a row policy in relation to A3 outlets would be acceptable to the Town Council only if the Primary Retail Frontage is extended as there has	The extent of the existing Primary Frontage has been revisited with different scenarios considered. It is proposed to extend the existing Primary Frontage to include the western side of Upper Frog Street. Text has been added to 'Policy 54 Retail in the National Park'

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			been a noticeable increase in change of use from A1 to A3 applications outside of the PRF in recent months which are diluting the potential retail offer.	and 'Policy 55 Town and District Shopping Centres' of the draft Deposit Plan to strengthen the policy context for considering the impact of new A3 proposals outside of the Primary Frontage upon the role of the Centres in meeting the needs of local communities.
2916 Tenby Town Council	3c	Yes	4.333 – extend the Primary Retail Frontage of Tenby to include all the walled town (it strikes us as strange that the PRF includes one side of Upper Frog Street and not the other) and also the area fronting the Conservation area.	The extent of the existing Primary Frontage has been revisited with different scenarios considered. It is proposed to extend the existing Primary Frontage to include the western side of Upper Frog Street, which causes minimal impact on the existing share of A1 units within the Primary Frontage (a decrease of 2%). Extending the Primary Frontage to include all the walled town and Conservation Area was found to decrease the baseline share of A1 units to 42% of total units (a decrease of 22%). This was not considered to be a sufficient share, A1 use would no longer be the dominant use within the Primary Frontage as a whole, the policy would be undermined in its ability to protect the core Centre, which maintains a dominant share of A1 units.
2708 Pembrokeshire	4.26		Each Local Planning Authority will provide for the development needs arising within its area. For cross-boundary settlements	Comment noted. No need to change the Sustainability Appraisal.

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County Council			and in some topic areas (minerals and waste for instance), PCNPA and PCC have and will continue to work together to reach appropriate policy solutions. There will not be a standard outcome – there might be some settlements where PCC makes most of the provision, others where it is appropriate for the PCNPA to do so. In topic areas such as minerals and waste, joint working will help to bring forward appropriate solutions.	
2708 Pembrokeshire County Council	Paragraph 4.27		The thrust of the first two sentences is understood, but there is no formal trade-off between provision of land for new housing, employment and retail on the one hand and recreational opportunities on the other hand. As noted elsewhere, perhaps this matter needs to be formally resolved at regional or all-Wales level. Also, for clarification, there is a substantial provision of recreational land outside the National Park, although there may be specific local problems to address.	It is agreed that there this paragraph is suggesting a formalised trade off scenario but a recognition of what happens in practice and what is reflected in the Spatial Plan. No changed needed.
2708 Pembrokeshire County Council	Point 8, page 22		It seems unlikely that there will be allocations for employment developments in the Replacement National Park LDP.	Yes agree. There will however be criteria based policies for the consideration of proposals.
2708 Pembrokeshire	Page 23 Point 12		Sentence 2 needs re-wording.	Agreed, amended.

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2708 Pembrokeshire County Council	Page 30 Point 23		The sentence ‘current working quarries are reaching the end of their lives’ could be more specific. Some of the NP minerals permissions still have quite a few years to run before either the permission or the economic resource runs out. However, the need to look for future minerals production outside the National Park is not disputed.	Agreed, text has been amended to include Pantgwyn and Trefigin end dates, 2024 and 2029 respectfully, both within the replacement plan period.
2708 Pembrokeshire County Council	Pages 40 to 44 Options 1 and 2 under policies 2, 3, 4, 5 and 6		In the right hand column, reference is made to minerals and waste policies, but this did not seem to relate particularly closely with the policies under discussion, which don’t specifically refer to either minerals or waste.	The usage of materials is implicit in any development, as is the creation of waste.
2708 Pembrokeshire County Council	Policy 29		Options requiring more than what is separately required under Building Regulations might have an impact on development viability, particularly in the context of significant expectations for affordable housing provision. The aspiration is worthy, but if new housing development doesn’t happen, that will add to affordability problems.	Agreed.
2708 Pembrokeshire County Council	Policy 34		Appraisal – not all development has to be directed away from areas of flooding and coastal inundation. Some less vulnerable	The policy allows for development in accordance with TAN15, Flooding which already makes reference to these

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Council			development may be possible, subject to suitable mitigation and there being no negative downstream fluvial or inland tidal impacts.	exceptions.
2708 Pembrokeshire County Council	Various		There is some concern that the Initial SA Report uses the JUDP as an option, for example for policies 2 to 7. The SEA guidance says that alternatives should be reasonable, realistic and relevant. In this context, is the JUDP too far back in time to provide options for PCNP LDP 2?	As the basis for the first Local Development Plan's choice of strategy included consideration of the approach taken in the Joint Unitary Development Plan to err on the side of caution it is proposed to retain it.
3468 Ms Mary Sinclair, Campaign for Protection of Rural Wales	3a)		No	Support for content noted.
3468 Ms Mary Sinclair, Campaign for Protection of Rural Wales	3b)		Yes We believe that a renewable energy policy which includes on-shore wind energy and yet does not recognise a Buffer zone to protect the public is unsustainable	Officers consider that the most effective way to consider the public impact of specific renewable energy proposals is on a case by case basis rather than the use of prescribed buffer zones. The impacts will vary according to many site and development specific variables. Each case will be determined on its merits, for example against the relevant ETSU guidance and advice from statutory consultees.
3468 Ms Mary	3b)		We believe that and LDP which does not	This is not required as national planning

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Sinclair, Campaign for Protection of Rural Wales			include policies in place to conserve the soil resource and the Best and Most Versatile agricultural land is unsustainable.	policy is sufficient. A reference to national policy has been included in the reasoned justification to Policy 7 Countryside.
3468 Ms Mary Sinclair, Campaign for Protection of Rural Wales	3c)		Yes Policy 33 should be amended to include a Buffer zone requirement since it does not appear in the Renewable Energy SPG. People are being left unprotected without it. Currently noisy wind turbines are not being adequately dealt with. Turbines can be tuned down for purposes of testing and then returned to the previous level of noise. The Condition in place to protect people is inadequate.	Officers consider that the most effective way to consider the public impact of specific renewable energy proposals is on a case by case basis rather than the use of prescribed buffer zones. The impacts will vary according to many site and development specific variables. Each case will be determined on its merits, for example against the relevant ETSU guidance and advice from statutory consultees. Noise Impact Assessments can be requested by the Authority should turbines be suspected of operating outside of the permitted noise thresholds outlined in planning conditions. Subsequent enforcement action can be authorised if required.
3975 Mr & Mrs RTB Porch	124 Tower Hill, Dinas Cross		2. The site is located too far from the centre of Dinas Cross to minimise the demand for travel, especially by private car. Car use would increase and also increase the danger to pedestrians, cyclists and horse riders.	It is not proposed to allocate the site for housing development due to concerns over its deliverability, the site is not included within the revised Centre boundary for Dinas Cross although any proposal for an affordable housing

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			<p>3 The site should be retained as a Green Wedge as development would cause an unacceptable detrimental impact upon the existing character of Brynhenllan.</p> <p>4/5 Incorrect. Visitors will not be willing to rent the holiday accommodation in the area. The majority of residents do not walk along the coastal path!</p> <p>6 Surface water run-off will definitely increase. The land is not permeable.</p> <p>8 Affordable housing should be in the village centre, where there is close access to facilities. Existing facilities do not include a school or GP. There is little employment.</p> <p>13 Housing development would not help to support existing community facilities. The GP centres in Newport and Fishguard are overstretched.</p> <p>14 The opposite – biodiversity impacts could not be mitigated and certainly couldn't be enhanced.</p>	<p>exception site will be considered on its merits.</p> <p>2. The site is currently located adjacent to the existing Centre Boundary for Dinas Cross and is as such considered to be located within a sustainable location for the purposes of the Local Development Plan. The Highways Authority has advised that highway improvements will be required as part of any scheme for development.</p> <p>3. The Settlement Capacity Study (2014) identified this site as having landscape capacity for residential development, subsequent Officer site visits and consideration confirmed this view. To maintain a Green Wedge status in the replacement plan would therefore be contrary to this view.</p> <p>4/5. Comments are noted. The following commentary has been deleted from No. 5 of the Sustainability Appraisal as it is not considered relevant: 'Development proposes housing with an element of affordable housing which will provide permanent residences in the community.'</p>

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			<p>15 Development could not enhance the quality of inland and coastal waters as drainage of the land and sewage capacity is inadequate. Contaminated surface water run off would pollute streams and coastal water at Pwllgwaelod which is already identified as a 'dirty beach'.</p> <p>Overall Sustainability Appraisal – Mainly negative impacts.</p> <p>Not acceptable for developments.</p>	<p>6. Dwr Cymru has been consulted and has not objected to development of the site in principle.</p> <p>8. The site is currently located adjacent to the existing Centre Boundary for Dinas Cross and is as such considered to be located within a sustainable location for the purposes of the Local Development Plan.</p> <p>13. Additional housing development is considered to strengthen the need for the provision and improvement of community facilities in the area.</p> <p>14. Any proposed development found to cause an unacceptable detrimental impact upon biodiversity levels would not be supported by the draft Deposit Local Development Plan.</p> <p>15. Any proposed development found to cause an unacceptable detrimental impact upon the quality of inland and coastal waters would not be supported by the draft Deposit Local Development Plan.</p>

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4556 D& M Williams	General		No adverse comment.	Noted
2910 St Davids City Council	General		No adverse comment.	Noted
3617 The Coal Authority (M Lindsley)	General	General	No amendment needed	Noted
3820 D Hoare	Paragraphs 8, 9 and 15		Question 3: Sustainability Appraisal Comments a) Anything to remove? YES Remove Plans 142 and 097 from LDP since proposals violate paragraphs 8, 9, 15 b) Anything to include Biodiversity. Ancient unploughed meadowland. Impact of development on the City's relationship to its landscape. Safeguarding @ Ysgol Bro Dewi as a result of development.	The site is not proposed for re-allocation or inclusion within the Centre boundary, market housing would therefore be unacceptable in principle. Should a planning application for an exception site be received, the issues highlighted would form valid material planning considerations.
1670 Natural Resources Wales	0 General		Sustainability Appraisal (incorporating Strategic Environmental Assessment) scoping report June 2016 We have no comments Scoping report Appendix A – Review of	Noted.

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			relevant plans, policies and programmes We have no comments	