

**From:** [Morris, Sara](#)  
**To:** [NDF](#)  
**Subject:** Pembrokeshire County Council NDF response  
**Date:** 14 November 2019 15:37:06  
**Attachments:** [draft-national-development-framework-response-form\\_0.doc](#)  
[white associates map of landscape sensitivity to large scale caravan sites pembrokeshire 2019.docx](#)

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Please see attached a response from Pembrokeshire County Council – this was endorsed by its Cabinet in October 2019.

I also attach a map from the Council's LDP evidence base demonstrating the landscape capacity  
Should you have any questions on this response, please do not hesitate to contact me.

Yours sincerely,

Sara Morris

Sara Morris

Development Plans and Conservation Manager / Rheolwr Cynlluniau Datblygu a Chadwraeth  
Pembrokeshire County Council / Cyngor Sir Penfro  
County Hall / Neuadd y Sir, Haverfordwest/Hwlfordd,

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Dim ond y sawl y mae'r ddogfen hon wedi'i chyfeirio atynt ddylai ei darllen, a'i defnyddio ganddynt ar gyfer ei dibenion bwriadedig; ac ni ddylid fel arall ei hatgynhyrchu, copio, lledaenu, datgelu, addasu, dosbarthu, cyhoeddi na'i rhoi ar waith chwaith. Os ydych chi wedi derbyn yr e-bost hwn trwy gamgymeriad, byddwch cystal â rhoi gwybod i ni ar unwaith trwy ffonio 01437 764551 a'i ddileu oddi ar eich cyfrifiadur ar unwaith. Ni ddylid rhoi'r cyfeiriad e-bost i unrhyw drydydd parti na'i ddefnyddio ar gyfer unrhyw ddiben arall chwaith.

Gwefan Cyngor Sir Penfro - <http://www.sir-benfro.gov.uk>

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Mae'r llofnod hwn hefyd yn cadarnhau bod y neges e-bost hon wedi cael ei harchwilio am fodolaeth frysau cyfrifiadurol a chod

maleisus.


Cyngor Sir Penfro  
Rhif ffôn 01437 764551  
E-bost [ymholiadau@sir-benfro.gov.uk](mailto:ymholiadau@sir-benfro.gov.uk)

Rydym yn croesawu gohebiaeth yn Gymraeg a Saesneg a byddwn yn ymateb cyn pen 15 diwrnod gwaith fan bellaf. Byddwn yn ymateb yn yr un iaith â'r ohebiaeth a dderbyniwyd (oni bai eich bod yn gofyn i ni wneud yn wahanol).

Os am gopi mewn print mawr, fformat hawdd ei ddarllen, Braille, sain neu mewn iaith arall, cysylltwch â'r person a anfonodd yr e-bost hwn.

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## **Consultation Response Form**

Your name	<b>Sara Morris (Development Plans and Conservation Manager)</b>
Your address	<b>Development Plans and Conservation Pembrokeshire County Council County Hall Haverfordwest Pembrokeshire SA61 1TP</b>
Preferred contact details (email/phone/post)	
<u>Organisation (if applicable)</u>	<b>Pembrokeshire County Council</b>

## 1. NDF Outcomes (chapter 3)

The NDF has proposed 11 Outcomes as an ambition of where we want to be in 20 years' time.

- Overall, to what extent do you agree or disagree the 11 Outcomes are a realistic vision for the NDF?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- To what extent do you agree with the 11 Outcomes as ambitions for the NDF?

Agree with all of them	Agree with most of them	Agree with some of them	Agree with none of them	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree with any of the 11 Outcomes, please tell us why:

There is no reference within the 11 Outcomes to sustainable waste management. This is a major omission and should be addressed.

On Outcome 6 – the culture, heritage and environment of Wales will not just provide economic benefits – they should also be valued in their own right.

What does 'more liveable' mean in relation to Outcome 9?

## 2. Spatial Strategy (policies 1 - 4)

The NDF **spatial strategy** is a guiding framework for where large-scale change and nationally important developments will be focused over the next 20 years.

- To what extent do you agree or disagree with the spatial strategy and key principles for development in...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion
Urban areas (Policies 1, 2 & 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rural areas (Policy 4)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you have any comments on the spatial strategy or key principles for development in urban and rural areas, please tell us:

Policy 2 and Policy 3– Supporting Urban Centres and Public Investment, Public Buildings and Publicly Owned Land both suggest that new public service facilities of a significant scale should be located in town and city centres and that a sequential approach should be used to assess development plan allocations and to determine planning applications for development. As this policy refers to Towns, it appears to apply to rural parts of Wales as well as Urban. Town and City centres are very geographically small in area. This policy as currently phrased appears unrealistic given the large areas of land required to support certain public service facilities such as schools, where a per head requirement for open space would make finding a new site within a town or city centre very challenging. This policy also as currently drafted does not reflect the increasing tendency for services to be amalgamated and for larger single facilities to be located to serve wider geographical areas. In rural areas in particular, a facility may be required outside a large settlement in order to meet the needs of a wider geographical population. The proposal for a new hospital in West Wales is for example, unlikely to be located in a Town Centre as the Hywel Dda Trust has identified an area of search between Narberth and St Clears. We would suggest that this policy be reconsidered. Clarification should firstly to establish whether it refers only to the Urban areas identified on page 24 as Cardiff,

Newport and Valleys; Swansea Bay and Llanelli and Wrexham and Deeside. Further consideration should also be given as to whether the criterion should perhaps refer to location within a settlement or to locations which best meet the needs of the community served by the facility. Such a criterion would cover cases where a location outside a settlement is required to serve wider geographic communities.

Under Policy 4 – support recognition that there should be proportionate growth in rural towns and villages. As a wider comment however – there is a lack of clarity in this section about what constitutes Urban and Rural.

A specific policy on the importance of the role of the National Parks and Areas of Outstanding National Beauty in Wales would help to strengthen the rural element of the NDF as well as in providing guidance on how proposals outside these areas which might impact on them will be assessed.



### 3. Affordable Housing (policy 5)

The NDF sets out the approach for providing affordable housing, encouraging local authorities, social landlords, and small and medium-sized construction and building enterprises to build more homes.

- To what extent do you agree or disagree with the approach to increasing affordable housing?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree, in what other ways can the NDF approach the delivery of affordable housing?

The reasoned justification could be strengthened by a reference to Community Land Trusts as an additional mechanism for delivery of Affordable Housing.

### 4. Mobile Action Zones (policy 6)

- To what extent do you agree or disagree the identification of mobile action zones will be effective in encouraging better mobile coverage?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree, in what other ways can the NDF improve mobile phone coverage in the areas which currently have limited access?

We are supportive of the principle of Mobile Action Zones. It is disappointing that no information on the precise geographical location of these Zones is available to accompany the consultation. Without this information it is difficult for respondents to comment in a meaningful way on this policy. We would urge Welsh Government to consult on the Zones before finalising them.





## 5. Low Emission Vehicles (policy 7)

- To what extent do you agree or disagree that policy 7 will enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree, in what other ways can the NDF enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

Whilst we welcome the broad approach, this policy could be strengthened to explicitly encourage LPAs to include requirements in Development Plans for residential properties to include ULEV charging points where appropriate.

## 6. Green Infrastructure (policies 8 & 9)

- To what extent do you agree or disagree with the approach to maintaining and enhancing biodiversity and ecological networks?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## 7. Renewable Energy and District Heat Networks (policies 10-15)

- To what extent do you agree or disagree with the NDF's policies to lower carbon emissions in Wales using...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
Large scale wind and solar developments	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
District heat networks	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree with the NDF's approaches to green infrastructure, renewable energy or district heat networks, what alternative approaches should we consider to help Wales to enhance its biodiversity and transition to a low carbon economy?

In the sub-section on Strategic Green Infrastructure Mapping, WG says that development plans should set out appropriate policies to safeguard and connect these areas (priority areas for action) and to protect and enhance their identified key ecological functions and features. That is guidance and should be in PPW or a TAN, rather than in the NDF.

In terms of the identification of the Priority Areas – insufficient consideration has been given to the proximity of these areas to National Parks and AONBs. In the Pembrokeshire County Council Renewable Energy Assessment, a 1 km buffer from the National Park was assumed. Our understanding is that some other Authorities have used a greater distance. We consider that as a minimum a 1 km buffer away from National Park and AONB boundaries should be used when establishing Priority Areas. This would mitigate against impact on the National Park landscape, given the strong intervisibility that exists between locations in the National Park and outside it in a Pembrokeshire context.

We are concerned that the Priority area for Solar in North Pembrokeshire has not considered landscape capacity in this area. Simon White Associates Limited have recently undertaken a Caravan



and Chalet Capacity Assessment for Pembrokeshire County Council as part of the LDP evidence base. They have identified areas of North Pembrokeshire as being very sensitive to medium or large scale caravan proposals because of the intervisibility with areas of the National Park. We have appended a map extract from this study for information but would suggest that such landscape sensitivity also applies to Solar arrays and should be given careful consideration.

In terms of the identification of the Solar and Wind Priority Area in Carmarthenshire which extends into East Pembrokeshire, we are concerned regarding the HRA undertaken that this does not adequately consider the impact of this Priority Area on Barbastelle bats and the important connectivity routes that extend into the area identified in Pembrokeshire. We consider this Area to be too extensive in nature and suggest that it should be retracted further into Carmarthenshire.

The current wording of Policy 11 is too ambiguous. From the supporting text it appears that this policy will only apply to proposals that are of a scale that means they will be determined under DNS procedures, however this is not made clear within the policy text. This requires clarification for the avoidance of doubt. If this policy is not to apply to developments below that threshold, it should be made clear within the policy text that this is the case.

## 8. The Regions (policy 16)

- To what extent do you agree or disagree with the principle of developing Strategic Development Plans prepared at a regional scale?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The NDF identifies three overall regions of Wales, each with their own distinct opportunities and challenges. These are North Wales, Mid and South West Wales, and South East Wales.

## 9. North Wales (policies 17-22)

We have identified Wrexham and Deeside as the main focus of development in North Wales. A new green belt will be created to manage the form of growth. A number of coastal towns are identified as having key regional roles, while we support growth and development at Holyhead Port. We will support improved transport infrastructure in the region, including a North Wales Metro, and support better connectivity with England. North West Wales is recognised as having potential to supply low-carbon energy on a strategic scale.

- To what extent do you agree or disagree with the proposed policies and approach for the North Region?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## 10. Mid and South West Wales (policies 23-26)

Swansea Bay and Llanelli is the main urban area within the region and is our preferred location for growth. We also identify a number of rural and market towns, and the four Haven Towns in Pembrokeshire, as being regionally important. The haven Waterway is nationally important and its development is supported. We support proposals for a Swansea Bay Metro.

- To what extent do you agree or disagree with the proposed policies and approach for the Mid and South West Region?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



## 11. South East Wales (policies 27-33)

In South East Wales we are proposing to enhance Cardiff's role as the capital and secure more sustainable growth in Newport and the Valleys. A green belt around Newport and eastern parts of the region will support the spatial strategy and focus development on existing cities and towns. Transport Orientated Development, using locations benefitting from mainline railway and Metro stations, will shape the approach to development across the region. There is support for the growth and development of Cardiff Airport.

- To what extent do you agree or disagree with the proposed policies and approach for the South East Region?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

If you have any comments about the NDF's approach or policies to the three regions, please tell us. If you have any alternatives, please explain them and tell us why you think they would be better.

PCC support the identification of Haverfordwest, Milford Haven and Pembroke Dock as centres for regional growth, but suggest that Pembroke should be omitted from this category. This is on the basis that it has a lower level of services than the other settlements identified as demonstrated in the LDP Evidence base for the Authority. It is also in recognition of its important historic environment, noting that on this basis there will be less potential for significant housing and employment growth of the type envisaged for the other three towns. PCC also propose that Fishguard should be recognised as a nationally important strategic port with international connections, as is the case for both Milford Haven and Holyhead.

Within the section on the Mid and South West Wales region a specific reference to a need for 23,400 homes until 2038 is identified, with an indication that 44% of these should be affordable. PCC suggest that great care should be taken in identifying regional housing need figures, as projections change frequently and there is a need for WG to find a way to reflect in the NDF the most recent position.

PCC is supportive of the principle of identifying the Haven Waterway as being of regional and national importance. However, this policy as currently drafted is too vague and could lead to inappropriate development being supported on key sites within the Haven Waterway. Instead of referring to 'operations', 'development' or 'appropriate new development', specific reference to the deep water access and port of Milford Haven should be made. The policy should be expressed in a way that support proposals that would complement the port, its activities and make best use

of the unique deep-water access opportunities that exist in that area.

PCC is also disappointed that, when compared with the NDF policy position on Anglesey, the NDF seems to diminish the role of Pembrokeshire. There is no equivalent to policy 22 (NW Wales and Energy) for Pembrokeshire – even though the Haven Waterway is the UK's biggest energy port with a £60m + City Deal renewable energy project and the possibility of a major hydrogen project. The map for NW Wales indicates an 'Anglesey Energy Island' and also shows 'Anglesey Airport'. PCC would like to see something closer to policy 22 for Pembrokeshire, focusing on the Haven Waterway as an energy port and with the related map showing an 'Energy' icon for the Haven Waterway and also identifying the Airport at Haverfordwest (Withybush). A strengthened policy 25 might be a way to address this shortcoming.



## 12. Integrated Sustainability Appraisal

As part of the consultation process, an Integrated Sustainability Appraisal (ISA) was conducted to assess the social, economic and environmental impacts of a plan. The report identified a number of monitoring indicators, including health, equalities, Welsh language, the impact on rural communities, children's rights, climate change and economic development.

- Do you have any comments on the findings of the Integrated Sustainability Appraisal Report? Please outline any further alternative monitoring indicators you consider would strengthen the ISA.

No comments.

## 13. Habitats Regulations Assessment

As part of the development of the NDF, a Habitats Regulations Assessment (HRA) was undertaken. The purpose of the HRA process is to identify, assess and address any 'significant effects' of the plan on sites such as Special Areas of Conservation and Special Protection Areas for birds.

- Do you have any comments on the Habitats Regulations Assessment report?

We have significant concerns over the robustness of the Habitats Regulations Assessment report.

The 'Rule of Thumb' document lists all the SPAs and SACs along with their features, but it states that for the Pembrokeshire Bat Sites and Bosherton Lakes SAC the primary feature is 'lake' and that bats are a secondary feature. That is incorrect – the qualifying features are greater and lesser horseshoe bats, oligo-mesotrophic waters and otters.

The HRA Appendix B document leaves out the Pembrokeshire Bat Sites SAC.

## 14. Welsh Language

We would like to know your views on the effects that the NDF would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.

- What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

The document does not set out clearly how it is likely to impact on the Welsh Language and how such effects have been mitigated.

Please also explain how you believe the proposed NDF could be formulated or changed so as to have:

- I. positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and
- II. no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Clearer maps would be of assistance – the scale at which certain proposals are shown is not sufficient given this document will have Development Plan status.

## 15. Further comments

- Are there any further comments that you would like to make on the NDF, or any alternative proposals you feel we should consider?

The Draft NDF proposes three regions for Wales and states that a Strategic Development Plan should be prepared for each of these regions. Although the potential for Strategic Development Plans was set out in the Planning Wales Act – the consultation around that Act described a situation where these would cover three primarily urban areas in Wales. The Draft NDF now suggests that coverage should include all of Wales. PCC does not consider that there is a need in all parts of Wales for an SDP, given the existence of both LDPs and the NDF. If WG bring in later

legislation making this a legal requirement, this should be supported by providing appropriate additional resources to LPAs.

**16. Are you...?**

Providing your own personal response	<input type="checkbox"/>
Submitting a response on behalf of an organisation	<input checked="" type="checkbox"/>

<b>Responses to the consultation will be shared with the National Assembly for Wales and are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here</b>	<input type="checkbox"/>
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