

**Emma Evans**

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**From:** No Reply - Pembrokeshire County Council  
**Sent:** 25 October 2024 21:41  
**To:** LDP - For Enquiries  
**Subject:** LDP consultation

**Categories:** D Rep



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## Pembrokeshire County Council Local Development Plan 2 Deposit 2

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DATE  
TIME 9:40:57 PM

Question

Answer

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Name: Martin Bell

Job Title: Personal

Organisation: Personal

Address:

Telephone Number:

Name:

Job Title:

Organisation:

Address:

Telephone Number:

Main Contact Email Address:



Date:

Your name / organisation:

Martin Bell

Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements.:

I think the LDP is unsound and should be changed

Which part of the Plan (or supporting documents) are you commenting on? Please tick all that apply or use the text box to specify:

LDP 2 Deposit 2 plan text

Other (Please specify):

Policies:

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References:

Selected Features:

Would you like the LDP to include a new policy, site allocation or paragraph?:

Site reference (if known)::

Name::

Location::

Justification on inclusion of alternative site allocation, policy or paragraph:

Are you submitting additional material to support your representation?:

Yes

Supporting document 1 (5mb limit):

Supporting document 2 (5mb limit):

Supporting document 3 (5mb limit):

If you are objecting to the LDP, do you want to speak at a hearing session of the public examination?:

I do not want to speak at a public hearing and am happy for my written representations to be considered by the Inspector

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If you want to participate in a hearing, indicate below what you want to speak about (e.g. Housing site at Pen y Graig or The overall housing target ).:

If you wish to speak, it would be helpful if you could indicate in which language you would like to be heard.:

#### NOTES

This form was created on a computer and is valid without the signature and seal.

**Introduction.**

This challenge to the **Soundness** of LDP2 Deposit Draft relates to:-

**The failure of the Planning Authority to reflect better the delivery of a zero-carbon economy within Pembrokeshire by 2030 as required by its own declaration of a Climate Emergency in 2019.**

In March 2019 the Welsh Government published “*Prosperity for All: A Low Carbon Wales*”, which sets out 100 policies and proposals to set the foundations for Wales to transition to a low carbon nation. On the 29th of April 2019, the Welsh Government’s Environment Minister Lesley Griffiths declared a “Climate Emergency” in Wales, highlighting the threat it poses to our health, economy, infrastructure and our natural environment. The Welsh Government has committed to achieving a carbon neutral public sector by 2030. The Environment Act is Wales’ only formal carbon reduction target – Act Part II specifies an 80% reduction in all net Wales emissions by 2050 against a 1990 baseline. (Source – extract from Report No 40/19 by the Performance and Compliance Co-ordinator and Conservation Policy Officer dated 16<sup>th</sup> October 2019).

In May 2019 Pembrokeshire County Council declared a Climate Emergency and set up a **NET ZERO CARBON 2030 WORKING GROUP** to consider how the County Council’s own services could be delivered in a more carbon free manner. Whilst this move is to be applauded and considerable progress has been made, the remit would appear not to cover all policies of the Council, for example as reflected in a number of policies within LDP2, particularly those in respect of the proposed distribution of residential land allocations and the associated opportunities for more small scale developments in the numerous Service Villages (44) and Local Villages (69).

In October 2019 in “*The Planner*” which is published by the RTPI published an article entitled “*Councils must climate-proof plans*” which included the following extracts:-

*In July 2019 the Committee on Climate Change published its annual report to Parliament on the UKs progress in reducing emissions and adapting to risks of climate change.*

*Its conclusions were damning. The Committee found there was “a substantial gap” between planned policies and what is required and “an even greater shortfall in action”.*

*...few (local authorities) can show that their planning policies are designed to secure their area’s contribution to full decarbonisation of the UK as required ...under section 19(1A) of the Planning and Compulsory Purchase Act 2004 – which reads Development Plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the LPA’s area contribute to the mitigation of, an adaption to climate change”*

Recent research by RTPI published in The Guardian 6<sup>th</sup> November 2024 still found “*Planning rules have failed to link new homes to public transport*”.

The Welsh Government in its response to the Draft LDP Policies which were circulated before the Declarations of Climate Emergency, stated that:-

*“The Welsh Government questions why the Preferred Strategy (60% of development to main towns and 40% to the rural settlements) has been chosen as your evidence demonstrates it is not the most sustainable strategy. The Council’s evidence states Option 1 a 70:30 split is a more sustainable strategy. We disagree with the simplistic assumption that there will be increased congestion and pollution issues arising from Option 1 as opposed to Option 2, particularly as the majority of employment and trip destinations will be in the main urban areas where the co-location of homes and jobs would be possible. Option 1 would align better with the objectives of Active Travel Act by promoting sustainable travel options”.*

(Source - page 16 of the schedule of responses by Mr Newey on behalf of W.G)

There is insufficient recognition by the Planning Authority in the drafting of policies in LDP2 to reflect / implement the previous Declaration of a Climate Emergency. This Declaration occurred between the adoption of LDP1 in February 2013 and this Deposit Draft of LDP2 as presented to Cabinet in July 2024 and to Council on 13<sup>th</sup> September 2024. As a result, the policies incorporated in LDP2 should have reflected the implications of that earlier Declaration which implied the need to reduce CO<sub>2</sub> emissions across all areas of the Authority’s responsibilities.

It is noted that the objectives of LDP2 include the need to reduce vehicle mileage across the County. This objective would be particularly relevant to petrol and diesel cars which will remain as the majority of individual journeys within the Plan period. The mileage driven by electric vehicles will also need to be limited because of the global scarcity of minerals required for manufacturing electrical components and for the need to recharge from the grid as and when required. As a result, there are already UK wide ideas of charging per mile in order to limit personal use of individual vehicles and as an incentive for goods vehicles to similarly reduce their own mileage.

In this context it is noted, (Source Executive Summary), that *“A weighting system has been applied which gives greatest weight to those facilities identified as being likely to reduce the need to travel and therefore most likely to contribute to a sustainable location. The greatest levels of growth (housing sites of 5 or more) will be located in settlements which are at a Service Village level or higher within the Settlement Hierarchy”.*

*“A 60% / 40% Urban / Rural split of housing allocations (sites over 5 units) is proposed. This is broadly in line with the current population split in Pembrokeshire. This approach offers growth opportunities to both urban and rural communities.*

It is suggested that the opportunity should have been taken to work towards a 70 urban : 30 rural split when drafting the replacement LDP2 - an approach which would have:-

- Helped to reduce future mileage
- Reflected the trend towards fewer facilities and services in Villages, for example rural schools, shops and post offices
- Reflected Welsh Government advice

Such a shift away from a rural and dispersed pattern of residential development would have also assisted with the costs of the Local Authority providing its own services, including the provision of:-

- Health and social care, particularly where home visits are required. Journey times between patients are costly for the employer as they limit the times that can be spent actually delivering that care. In the context of health care costs, the Daily Mail of 16<sup>th</sup> July 2024 reported that The Royal College of Physicians *"also calls on them to reduce their carbon footprint ... as a way of cutting down on environmentally damaging travel .... The document bills climate change as one of the biggest threats to human health..."*
- Recycling services where almost every home has to be visited on a weekly basis
- Regular and school bus services. In this context, with an aging population, it is particularly important that additional housing (other than justified 'rural enterprise sites') is focussed on those settlements which can expect a regular public bus service – and with regular meaning more than one in each direction per day. In the Western Telegraph of 9<sup>th</sup> October 2019 was an article about *"Bus to school out of catchment area to costs pupils £2.00 per day* and justified on the basis that *"it has the potential to off-set some of the £6m a year school transport costs*. School transport is available at no cost where pupils live over 3 miles from school. 44 Service Villages and 69 Local Villages (Policy SP6) would appear to be a generous strategy which allows new development to take place in locations which are not on a regular bus route.
- A more concentrated form of development involving fewer category 2c Villages in particular would also assist statutory undertakers when considering investment required to upgrade and expand existing facilities. For example, the introduction of phosphate scrubbers to waste water treatment works and / or to expand capacity of existing works all at the time of constrained financial resources.

Delivering a more concentrated form of development would not only help reduce demands on very limited budgets but also the associated carbon footprints.

A 70:30 split would mark an important shift to a more sustainable life style. What is proposed is an attempt to please all shades of opinion by describing intentions as backgrounds to policies but failing to deliver through policy positions.

Thus, any fundamental shift in approach has been not only been avoided but this replacement LDP incorporates greater flexibility in terms of location, which is particularly apparent in housing and in tourism policies.

This failure to change direction and respond to the Declaration of a Climate Emergency in 2019 is exemplified by the original intention of the Planning Authority in an early draft of LDP2 to include a Policy GN 12 *Infill Development in Hamlets Development*

This draft policy was intended to read:-

Proposals for residential development in locations where there is a physical cohesion of dwellings (hamlet) not identified within the Settlement Hierarchy as a settlement, will be supported where

1. The proposal is for a maximum of 1 or 2 properties on a site
2. It represents sensitive infill development of a small gap within an otherwise continuous built up frontage
3. The scale, layout and density is in keeping with (and not detrimental to) the character (including landscape and townscape) of the area;
4. In locations of 20 or more dwellings (including those with the benefit of planning permission), the development is for market or local needs affordable housing
5. In locations of less than 20 dwellings, the development is for local needs affordable housing.

It is interesting to note that - *“Policy GN 12 of LDP 2, Deposit Plan 1 from 2020, on Infill Development in Hamlets, has been deleted, following an objection from Welsh Government. Welsh Government advised that this policy is not in accordance with national policy should be deleted. There is no prospect that, if retained, it would survive the independent Examination of the Plan.”* (Source –Report to Cabinet Summer 2024)

Such advice would indicate that the LPA was proposing to allow even more residential development to take place in very rural locations across the County rather than restrict such proposals. This abandoned proposal would indicate that the Council was not serious about taking on board its own declaration of “a Climate Emergency” nor that declared by the Welsh Government.

Examples of increased flexibility in LDP2 which detract from a sustainable approach include:-

**1. The failure to adopt a 70:30 urban : rural split** – ie retaining the traditional 60-40 split as argued above, gives more chance for development in less sustainable / accessible communities.

**2. Placing ‘sustainability’ at the end of SP1, namely:-**

SP1 *Creating Sustainable Places.*

*All proposals must ensure that development supports the delivery of economic, social, environmental and cultural well-being and sustainable development.*

It is suggested that the policy is re-worded to read *All proposals must contribute towards the delivery of sustainable, economic, social, environmental goals and of cultural well-being* thus bringing ‘sustainable’ to the forefront of the policy as per its title.



**3. The introduction of Cluster Villages as a sub-set of Local Villages** introduces another area of not being serious about delivering a low carbon economy as this approach introduces both an area of flexibility as well as a degree of confusion regarding the siting of potential developments.

The reasoning behind this new category of 24 *Local Villages* which are apparently more than *Local Villages* is stated as:- *“They have a functional link with a higher order centre via a bus route into the settlement or have an active travel route option either a dedicated walking or cycle route to a higher order settlement which would amount to a maximum of 25 minutes travel time”* (LDP para 4.53). It is assumed that the 25 minutes relates to walking time, or circa 2km on the flat, and that the same frequency of bus routes will apply throughout the Plan period?

Interestingly *“functional link”* is not explained in the Glossary whilst *“Satellite Settlement”* is and with the explanation being *“A small hamlet or group of dwellings which is physically separate from a main settlement, but has a strong functional link to that settlement.”*

Additionally the term *“Well-related”* also appears in the Glossary with the explanation of *“Well-related means well-related to the built form of a settlement in terms of proximity, physical and sustainable connectivity and visual relationship.”*

It would appear that the term *“satellite settlement”* is of no longer of relevance as Welsh Government has indicated that *“Policy GN 12 of LDP 2, Deposit Plan 1 from 2020, on Infill Development in Hamlets”* is not appropriate and has therefore been withdrawn from the current Deposit Draft. It is also suggested that the opaque term *“functional link”* could also be withdrawn if the concept of *“Cluster Villages”* is abandoned as proposed below.

Cluster Villages, if they are to remain a separate category of settlements, should be seen as the subject of a separate policy with a revised Policy SP6 Settlement Hierarchy reading:–

*“2a Service Centres; 2b Service Villages; 2c Cluster Villages and 2d Local Villages.*

However, the justification for identifying 24 Cluster Villages as significantly different from Local Villages seems tenuous. For example, Maiden Wells it is suggested is on the edge of a 25 minute walk for home to shops in Pembroke (and with the need to return); and similarly from home to Hundleton. It is suggested, therefore, that Maidenwells does not have sufficiently strong links with either Pembroke or Hundleton to warrant any elevated level above Local Village.

In addition, it is also suggested that ‘cluster’ is hardly the right definition for these 24 villages with the dictionary definition of *Cluster* reading *“a group of similar things that are close together, sometimes surrounding something”*.

Conclusion re *“Policy SP10 Local Villages / Cluster Villages”* – this is a manufactured and misnamed category of Local Villages which fails to contribute to the required reduction in carbon emissions

Recommendation – Omit Policy SP10 and remove the asterisks of Policy SP6 element 2c Local Villages.

#### **4. Policy GN 56 Caravan, Camping and Chalet Development particularly**

##### **B New small scale caravan, camping and chalet proposals will be permitted where they are in locations deemed acceptable in landscape capacity terms.**

It is considered that relaxing control of chalet development (occupation for tourism purposes only) with the only constraint being subject to landscape capacity, will lead to development that is not in sustainable locations.

Relaxation of caravan, camping and chalet development control occurred initially to make Pembrokeshire more attractive as a holiday destination as Covid restricted holidays / breaks abroad. LDP2 is policy context until 2033. Chalets in particular are of a *permanent* nature and present situations where occupation can drift into permanent residence.

Such an open policy regarding structures offering all year and all-weather occupation is inconsistent with the principle of sustainability and the objective of reducing vehicle mileage to destinations in countryside locations.

It is suggested that there is an inconsistency therefore in being so liberal with such the 'chalet form' when the residential dwelling opportunities are more controlled.

#### **5 Policy GN58 Self-Catering Accommodation.**

The policy reads - *Self-catering accommodation will be permitted where it is located within a Town, Service Centre, Service Village or Local Village .....* In para 5.324 the second sentence reads "*It allows new non-caravan self-catering accommodation within a Service Village, Service Centre or Town*". It would appear that there is an inconsistency regarding Local Villages which are permitted to have self-catering accommodation in the title but not in para 5.324. Not permitting new self-catering in Local Villages would be consistent with minimising car trips to and from the more rural destinations – again a more sustainable policy.