



Stakeholder Seminar

10th February 2010

Withybush Pavilion, Haverfordwest

Introduction

As part of the ongoing preparation of the new Pembrokeshire Local Development Plan (LDP), stakeholders were invited to attend a consultation event at Withybush Pavilion, Haverfordwest.

The event took place on 10th February 2010 and in total 14 stakeholders took part from a range of backgrounds.

Aims of the Workshop

The preparation of the 'Deposit Plan' is a key part of the LDP process. With this in mind, stakeholders representing a range of interests and viewpoints were invited to the workshop and asked to consider proposed policy approaches for the new plan.

This will help the Council to understand the views and issues that key stakeholders would want the LDP to address and provide an indication of which policies might be favoured. The workshop involved a series of questions, discussions and presentations.

Stakeholders were divided into three groups for the day. Each group was led by a representative from the Planning service (whose role was to clarify issues during the discussion).

The outline of the day was as follows:-

- 1 – Preferred Strategy Feedback
- 2 – Moving the LDP Forward
- 3 – Group Sessions

Group Session A – Residential Development and Settlement Hierarchy

Group Session B – Development in Rural Pembrokeshire

Group Session C – Development Scenarios and the Economy

All stakeholders were provided with an information programme (included at the end of this report) for the event and feedback forms were provided for additional comments.

Key Outcomes from the Workshop

In general terms the stakeholder group was supportive of the broad policy approach, which placed a stronger emphasis on:

- supporting rural communities;
- encouraging small business and live work units, with attention focussing on the need to ensure deliverability of sites allocated in the plan, including the availability of infrastructure to bring sites forward;

- on the desirability of explanations within the reasoned justification;
- the role of supplementary planning guidance, particularly on precision of definitions and
- In setting out clearly the frequency of review and trigger points for early review.

The stakeholder group was supportive of the general development policy & design policy approach.

Some members of the group expressed concerns that policies would not come into effect until the LDP is adopted. However, this is not something that the Council can change.

Many minor concerns in relation to the effectiveness and deliverability of policies were addressed by the mechanism for monitoring, for 4 year review and for early review of policies where annual monitoring demonstrates that a key element of the plan is not being achieved.

Affordable Housing

The aspiration to deliver greater numbers of affordable dwellings than has to date been achieved by the JUDP was supported by all. Representatives from the development industry indicated that a period of stability with consistency in thresholds and requirements would be widely welcomed to allow better forward-planning by developers. There will be instances where no affordable dwellings are secured from a development, but clear and consistent thresholds are beneficial.

It is clear from discussions that there is ambiguity surrounding many of the key terms, such as “Local”, “Need”, “Affordable”, “Infill” etc, which the LDP or related SPG should clarify.

In terms of sustainability some people suggested that affordable homes should be concentrated in towns, service centres and larger villages, allowing their inhabitants greater access to work, facilities and social activity. However there was agreement in most groups that providing for people to live affordably in their rural communities should also be supported.

Exception Sites

All groups were largely of the opinion that exception sites should be a mechanism to deliver affordable housing to all areas of the county, with particular reference to rural settlements.

There was a difference of opinion over whether they are appropriate to Local Needs Villages. Such villages have the lowest service provision, and may be unsuitable areas to be locating the type of people that use affordable homes, with respect to their demand for public transport and other facilities. It was also queried whether in the absence of settlement boundaries they are actually practical and applicable. Conversely, it may be the case that

exception sites could be a way of developing Local Needs Villages in a way other than 'infill development' – effectively to allow rounding off or minor extensions to villages. Their use in service villages and centres was fully supported by stakeholders.

Exception sites should be of a scale and nature that is sensitive to the location in which they are built – and also recognise access to employment, transport and day-to-day services in / from that settlement.

Conversions

In relation to the conversion of barns, traditional and historic buildings there was a consensus that the Plan should support proposals which allow buildings to be looked after and used – the use should be appropriate to the area and local characteristics, rather than applying a one-size-fits all approach to use classes in converted buildings. Stakeholders suggested that the only exception to converting such buildings should be where environmental considerations outweigh the benefits of conversion. Traditional barns were cited as a particularly suitable opportunity to promote live-work units. A form of sequential test where conversion of buildings such as redundant schools to community use is favoured over residential was mooted as an idea to consider. The concept of converting a modern agricultural building to residential use was questioned and not considered appropriate by stakeholders.

Subdivision of buildings

The subdivision of buildings was not entirely popular as a concept. There was some concern that it can lead to a loss of character in buildings or over-intensify their use. Stakeholders suggested that an adequate supply of parking spaces should be one consideration in determining proposals, but more generally proposals should be appropriate to their context.

Gypsy Sites

Only short discussions were held regarding gypsy sites, with most stakeholders saying that extensions to existing sites would be the most manageable approach. It was explained that a Gypsy Needs survey is well underway, with conclusions expected soon. These will determine the policy approach of the Plan, and whether sites should be extended or new sites allocated.

Community Facilities

The provision of greater quantity and quality of community facilities was supported by most stakeholders and at every level of the hierarchy. There were concerns that provision in large settlements should reflect the existence of more local communities within them, and facilities in local needs villages should be viable and complement provision of other nearby small villages.

Town Centre Boundaries and Frontages

The suggestion was made by stakeholders to have town centre boundaries that are not too broad in order to protect high streets. Issues were also raised about how to protect small shops in settlements which are not Local Retail

Centres or Town Centres, whether this would be covered within a community facilities policy and if leisure facilities would also be protected? The primary frontage approach was supported by stakeholders, but with the proviso that it needs to be used in core areas.

Employment

Clarification was requested on the definition of 'countryside location' and 'immediately adjacent' and also whether being immediately adjacent to a settlement would apply to lower tier settlements without boundaries. Interest was shown in locating employment sites near an existing settlement to reduce the need to local residents to commute to work. It was also suggested that the reasoned justification should look not just at the impact on site but also impact on surrounding areas, lanes, access roads and infrastructure (these are issues that the General Development Policy will address, at least in part). In terms of demonstrating lack of viability, the consensus amongst stakeholders was that no single time period for marketing would be appropriate. However, the plan must demonstrate certainty and clarity on this issue. There needs to be flexibility for assessment which also depends on strength of evidence of marketing.

Visitor Economy

There was concern raised over the term 'quality' as a planning concept; was it an appropriate use of the word and did it imply low-end attractions would be refused? More detail was requested about the direction of development in tourism and the balance with environmental conservation. There was also stakeholder agreement to limiting further development of static caravan sites due to environmental impacts and pressure on the surrounding infrastructure.

Other and General issues

The various stakeholder groups appeared supportive of the idea that the General Development policy would ensure that every proposal would be assessed in terms of their use, location, relationship to other nearby development and so on.

Particularly at the lowest tier of the settlement hierarchy (Local Needs Villages) there were strong opinions from some stakeholders that uniform approaches (e.g. number of new dwellings) would not be suitable.

The proposal to not draw settlement boundaries for Local Needs Villages was challenged by some stakeholders on the basis that it might cause a lack of certainty and invite challenge from applicants. Some stakeholders acknowledged that there were many practical difficulties to drawing boundaries for every single village. The clarity of definitions will be important as a way of helping developers to know where there are development opportunities in Local Needs Villages. The use of Section 106 agreements to secure affordability in perpetuity was flagged up.

One stakeholder asked how the LDP was taking account of the period beyond 2021, for example in relation to predictions of flooding impacts and sea level rises.

The delivery of infrastructure – especially sewerage – to support development is a key consideration for the Council and stakeholders, with the aborted Merthyr Tydfil inquiry indicative of the Inspectorate’s view.

There were also stakeholder comments that Narberth should be protected from over development and that it would need a specific and strong LDP policy approach to achieve this.

Policy Area	Stakeholder Meeting	Suggested response
<p>Since the stakeholder meeting Local Needs Villages are now referred to as Local Villages. The stakeholder comments remain as they were made at the meeting however the responses have been updated to reflect this change.</p>		
<p>Scale of Growth / removal of contingency allocation</p>	<p>Concerns relating to what factors had been taken into account in identifying the scale of growth</p>	<p>Clear explanation of derivation of the growth requirement to be summarised in the Plan & incorporated in the background paper</p>
<p>Provision for affordable housing</p>	<p>Clear support for more effective delivery of affordable housing – increased numbers</p>	<p>Maintaining Affordable Housing Delivery Statement Approach on negotiations over 5 and over 10 units</p>
	<p>The need for policy stability / consistency for affordable housing and planning gain contributions to create certainty for developer financial planning and to obviate speculative landbanking.</p>	
	<p>Queried whether 100% affordable housing on any site was achievable – although some stakeholders thought it was.</p>	
	<p>Affordable homes should be concentrated in towns, but provision should be made for people to live in affordable homes in their own rural communities</p>	
	<p>Some concerns that Exception sites would be a mechanism to provide for affordable housing in all settlements (with some stakeholders suggesting that they should be focused on higher tiers in the settlement hierarchy).</p>	<p>Proposed use of Exceptions mechanism for all settlements physically, functionally and visually linked and appropriate and proportionate in scale and nature to the settlement in which it is located.</p>

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	Concerns about the proposed shift in emphasis with regard to the distribution of new development (particularly in terms of affordable housing provision).	
Local settlements needs	<p>Queried the policy approach for local needs settlements.</p> <p>Wanted provision for local people seeking access to housing in their home community.</p> <p>Identified the need for clear definitions.</p> <p>Wanted to allow for those seeking to return home who had worked away.</p>	<p>The policy approach proposed seeks to provide for affordable housing to meet local need , with reliance on the existing housing stock, proposed conversions for new open market housing aspiration and proposed ‘TAN 6 revision’ to meet rural enterprise needs new housing.</p> <p>It does not provide for ‘locals only’ housing without evidence of housing need. This is being offset by increased allocations in other settlements in rural areas which have good provision of services.</p> <p>Profiles information to be provided to enable members to understand how the policy will apply in different circumstance</p>
	Concern that the local needs settlement policy approach could lead to property price increases for open market housing.	
	Queried whether exception sites should apply to local needs villages and whether they would work in absence of settlement boundaries.	
	Concerned that target numbers for individual	Policy / justification should relate to

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	settlements should not be defined. Should be about need and suitability of the proposed location.	deliverability and compatibility of scale with the Community
Distribution of growth– Settlement Hierarchy	Some queries from stakeholders over whether the shift from a 70%Urban – 30% Rural distribution to 50-50 would be too dramatic? Could infrastructure providers respond sufficiently quickly to allow plan implementation?	50:50 split has been reflected in recent building rates
	Will the policies allow for rounding off as well as infill	Not intended to allow for rounding off in lowest tiers of settlement hierarchy, although in higher tier settlements the new settlement boundaries might allow for this. Also, rounding off could happen in any settlements through the application of an exceptions policy.
Conversions	Supported the need to bring redundant buildings back into productive use – and identified their potential for live – work units	Include live-work units as an option in this policy – they must meet the same criteria as conversion to residential development.
	Need to ensure a policy distinction between traditional and portal frame buildings	To be covered in the reasoned justification to the conversions policy.
Gypsy Traveller sites	Should the current survey demonstrate unmet need, then extensions to existing sites would be preferable to new sites.	Propose to bring back separately any suggested modifications to the gypsy policy that might result from the current survey
Employment	Concerns from stakeholders regarding change of use from employment and the proposed	The Council wishes to protect employment land from loss to other uses unless there is a

Policy Area	Stakeholder Meeting	Suggested response
	requirement to demonstrate viability and marketing of such sites.	sound reason for it, but will give further consideration to the best mechanism to achieve this.
	Stakeholders queried whether new employment sites be allowed in 'local needs' settlements.	Reasoned justification modified to allow for this
	Requested clear criteria for intensification of use	Reasoned justification modified to allow for this
Community Facilities	Concerns with mechanisms for managing the loss of community facilities	Allocations identified for schools, cemeteries and a hospital extension.
		Propose to modify reasoned justification to the Community Facilities policy to allow for this.
Town Centres	Requested clear monitoring	Propose to incorporate into Monitoring framework.
Visitor Economy	Concerns that the 'quality' and 'year round' approach would cause difficulties	Propose to refine policy approach to relate tourism attractions to Pembrokeshire's assets: landscape / activity / coast / marine / food / cultural and environmental heritage Refer to quality and extending season in the supporting text
Caravans and Chalets	Queried whether Policy approach proposed would be too restrictive on static caravans, lodges and log cabins	Maintain proposed approach and incorporate monitoring. Concerns not shared universally –proposed policies allow for new touring and tent sites,

Policy Area	Stakeholder Meeting	Suggested response
		but not new static caravan and chalet sites
Marinas		Proposed to provide allocations for new marinas at Fishguard and Pembroke Dock, as part of a broader policy on marinas which will also set out criteria that must be satisfied by new marina proposals at locations not specifically identified for that purpose by the plan.
Design		The policy approach will be amplified in SPG.
Renewable	Stakeholders suggested there might be a need to bring forward land to meet the needs of the Renewables industry – possibly including a waterside access site.	This issue will be given further consideration in drafting the Deposit plan.
Low Impact Development	Stakeholder concerns at potential loss of the JUDP low impact development policy.	Propose to rely on national policy – in proposed revision of TAN 6
Rural Social Care	Stakeholders thought that linkages between employment and social care provision should be given further consideration, particularly in rural areas.	Reasoned justification could explain the linkages between different policy areas.
Schools	The need to set out the County Council's approach to schools provision – Area Schools and to seeking shared service delivery	Reasoned justification could explain the linkages between different policy areas.
Broadband	Poor Broadband connectivity was identified as a barrier to business development / and growth	Reasoned justification could explain the

Policy Area	Stakeholder Meeting	Suggested response
	and to potential for home working	linkages between different policy areas.

List of stakeholders that attended:

Guy Thomas – Guy Thomas & Co
Matthew Owens – Rural Housing Enabler
Chris Lawrence – CCW
Martin Bell – PAVS
Ray Greenwood – PCC Transport and Environment
Alan Hunt – PCC Access
Louise Edwards – EAW
Martina Dunne – PCNPA
Sarah Middleton – PCNPA
Dean Chapman – WAG
Richard Crawshaw – South West Wales Economic Forum
Anne Evans – PCC Education
Kefin Wakefield – PCC Economy
Jan Britton – Job Centre Plus

Group 1:

Chris Lawrence – CCW
Martin Bell – PAVS
Ray Greenwood – PCC
Alan Hunt – PCC

LDP Officer – Bob Smith

Group 2:

Louise Edwards – EAW
Matt Owens – Rural Housing Enabler
Guy Thomas – Guy Thomas & Co
Martina Dunne – PCNPA
Sarah Middleton – PCNPA

LDP Officer – Sara Hill, Charlotte Harding

Group 3:

Dean Chapman – WAG
Richard Crawshaw – South West Wales Economic Forum
Anne Evans – Education

LDP Officer – Emma Evans, Jonni Tomos

List of invited stakeholders:

Welsh Assembly Government
Mid & West Wales Fire & Rescue Service
Dean Associates
Home Builders Federation
Dwr Cymru
Arts Council for Wales
West Wales Eco Centre and To Gwyrdd
Gareth Scourfield Associates
Ceredigion County Council
PALC
Cymdeithas Tai Cantref
Acanthus Holden Architects
Age Concern Pembrokeshire
Bluestone Leisure Limited
British Telecom plc
C/O Pembrokeshire NFU, Agriculture House
Celvac Environmental Solutions
Dyfed-Powys Police Force
Environment Agency Wales
Federation of Master Builders for Wales
Fishguard Harbour
Friends of the Earth Cymru
Havens Head Business Park
Haverfordwest
Hyder Consulting
Irish Ferries Terminal
Landsker Business Centre
Menter Iaith Sir Benfro
Milford Haven Port Authority
Network Rail Infrastructure Limited
Pembrokeshire College
Pembrokeshire Local Health Board
Pembrokeshire Tourism
Persimmon Homes
Richards Brothers
Shelter Cymru
Western Power Distribution
Evans & Co
PTP Quality Training Limited
Federation of Small Businesses
Jobcentre Plus
Dwr Cymru Welsh Water
Guy Thomas & Co
Hywel Dda NHS Trust
PLANED
Welsh Assembly Government
Uzmaston Projects Ltd
Dyfed Archaeological Trust

Department for Economy and Transport
One Voice Wales
South West Wales Economic Forum
Edward H Perkins
Pembrokeshire Coast National Park Authority
Pembrokeshire Housing
Pembrokeshire Business Network
Countryside Council for Wales
The Wildlife Trust of South & West Wales
RWE NPOWER
South West Wales Trunk Road Agency
Pembrokeshire Coast National Park Authority
Pembrokeshire Association of Voluntary Services
SWWITCH
Environment Agency Wales
Chevron Limited
Pembrokeshire Housing

Photos of the February Stakeholder Seminar





Stakeholder Seminar

**10 February 2010
Withybush Pavilion, Haverfordwest**

**Local Development Plan (LDP)
Update**

Welcome

Thank you for attending today's event. Stakeholder contribution is vitally important in shaping the strategy and policies of the emerging Plan and your continued commitment is appreciated.

Since the previous Stakeholder event, in December 2008, considerable progress has been made with the Local Development Plan. Most notably the Preferred Strategy was published in March 2009, setting out the Council's broad strategy for the spatial distribution and extent of development from 2011 to 2021.

Today's event will provide you with an update on progress and an opportunity to discuss the emerging Plan.

Agenda

10.30 am	Tea and coffee
11.00 am	Introduction and feedback on the Preferred Strategy
11.40 am	The emerging Plan
12.30 pm	Lunch
1.30 pm	Group Sessions - 3 sessions of 40 minutes each: <ul style="list-style-type: none">• Development in Rural Pembrokeshire• Residential development and the Settlement Hierarchy• Development scenarios and the Economy•
3.30 pm	Q & A session and closing remarks

The Preferred Strategy

A six-week public consultation was held on the Preferred Strategy from 25 March until 6 May 2009. Comments were received from the public, Town & Community Councils, developers, neighbouring authorities, planning consultancies, utility providers and public sector organisations, to name a few. The responses received covered a wide range of issues and topics, and each response has been considered as part of the process of developing the Preferred Strategy into a Deposit Local Development Plan. Some of the proposed changes prompted by responses to the consultation are listed:

- The identification of 'Climate Change' as a key objective;

- The removal of the 'Reserved Housing Land' strategic policy;
- Revision of the Settlement Hierarchy;
- Greater recognition of interrelationships with the National Park.

Towards a Deposit Plan

The next major stage of the Local Development Plan process is the preparation for publication of a Deposit Plan. You will be aware that Pembrokeshire County Council and the Welsh Assembly Government have agreed the revision of the Delivery Agreement timetable. Subject to approval by Pembrokeshire County Council the Deposit Plan will be published for a full public consultation in **late summer 2010**.

The Deposit Plan will include a vision, objectives, strategic policies, general policies and detailed maps indicating areas for development, safeguarding and key designations. It will be accompanied by a Report of Consultation outlining how comments at previous stages have influenced the Plan, a Sustainability Appraisal Report (incorporating SEA) and a Habitats Regulations Appraisal – these are legal requirements and ensure that the Plan contributes to sustainable development and has a minimal effect on European designated nature sites.

Scale and distribution of development

The Local Development Plan will adopt a more rural-focused approach to the distribution of development than the current adopted land-use plan – the Joint Unitary Development Plan. Half the overall dwelling requirement of 4950 will be directed to the urban settlements, and the other 50% to rural Pembrokeshire.

- **Hub Towns** – Haverfordwest, Milford Haven, Pembroke Dock, Pembroke, Neyland, Fishguard and Goodwick. There will be employment allocations, opportunities to regenerate town centres, develop community facilities and quality tourism attractions.
- **Rural Pembrokeshire** – the remaining 50% of residential development will be directed to rural Pembrokeshire according to the settlement hierarchy, with more development to the larger settlements such as Narberth, Johnston, Kilgetty, Crymych and Letterston. The Plan will be supportive of proposals to expand businesses, new community facilities, quality tourism attractions and the delivery of affordable homes.

Two key general policies

General Development – elements that are universal issues in most planning applications, e.g. links to local character, natural environment and biodiversity, highway safety, access, amenity etc.

Design & Climate Change – promotion of high quality design, resource efficiency, flexibility and adaptability.

Future Stages following the Deposit Plan

Advertising 'Alternative Sites'	January 2011
Submission to Welsh Assembly Government	June 2011
Examination	October 2011
Adoption	September 2012