Adran yr Amgylchedd, Cynaliadwyedd a Thai Department for Environment, Sustainability and Housing



Martina Dunne
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Pembrokeshire Coast National Park
Authority
Llanion Park
Pembroke Dock
Pembrokeshire
SA72 6DY

Eich cyf: Your ref 1569/LDP Ein cyf: Our ref APP30-01-017/4 Dyddiad: Date 10th February 2010

Dear Martina

Pembrokeshire Coast National Park Local Development Plan (end date 2021) Proposed Focussed Changes to the Deposit Plan

Thank you for your letter of 14th December.

We note that the proposed focussed changes document includes the sustainability appraisal screening assessment for each of the proposed changes.

Our clarification letter (CL-01-2009 – 10th June 2009) advised local planning authorities in relation to advertising focussed changes; that what is anticipated is "an extremely small number of focussed changes that reflect key pieces of evidence but do not go to the heart of the plan, affecting only limited parts of it". Similar guidance is also contained in the examination procedural guidance issued by the Planning Inspectorate Wales in November 2009. The National Park Authority is proposing 93 focussed changes, and it is questionable as to whether many, if any, are 'focussed changes' within the definition of our letter. Indeed, we note that the full list of changes comprises all the changes that the Authority is proposing and that there is no separate schedule of minor editing changes which do not need public consultation.

We have considered how these proposed focussed changes (FC) address our representations to the Deposit LDP. We indicate in the attached annex whether the changes meet the matters raised in our deposit representations; we have used the deposit reference numbers that you have provided.

Yours sincerely

Mark Newey
Joint Head of Plans, Management and Performance
Planning Division



ANNEX

Pembrokeshire Coast National Park Local Development Plan (end date 2021) Proposed Focussed Changes to the Deposit Plan

Deposit Reps 1569/312 - relationship to neighbouring areas

- no FCs.

Deposit Reps 1569/317 - housing / affordable housing

- no FCs.

Deposit Reps 1569/320 - policy 32 housing (strategy policy)

- no FCs.

Deposit Reps 1569/321 - affordable housing

- no FCs.

Deposit Reps 1569/322 – rural centres settlement boundaries

- no FCs.

Deposit Reps 1569/323 - green wedges

- met by FC60 (and note that the green wedge background paper has been amended).

Deposit Reps 1569/324 - gypsy sites

- partially met by FC45 (no reference to concern about evidence base).

Deposit Reps 1569/325 - minerals

- minerals safeguarding areas fully met by FC81;
- buffer zones almost met by FC22 (no reference to extent of relevant buffer zones);
- policy 14 inactive mineral sites partially met by FC26.

Deposit Reps 1569/326 & 1569/1148 – locational policy omissions

- met by FC 22, 38, 40, 48, 49, 22, 60, 61.

Deposit Reps 1569/328 – national park purposes and duties

- met by FC18, 59.

Deposit Reps 1569/329 - policy 6 countryside

- note FC17 but consider this a matter that could be considered further by the Inspector.

Deposit Reps 1569/330 – policy 47 local sites of nature conservation or geological interest

- note FC57 but consider this a matter that could be considered further by the Inspector.

Deposit Reps 1569/331 – implementation and monitoring

- partially met by FC79 in relation to annual housing targets.

Deposit Reps 1569/332 – flooding and coastal inundation

- unclear: FC35 doesn't provide the redrafted wording for the policy, although its intent would appear to meet our concern

Deposit Reps 1569/333 - waste

- no FCs.

Deposit Reps 1569/334 – policy 44 telecommunications

- partially met by FC51 (regarding paras 4.209 & 210 only; – more justification was sought for the latter section of policy 44)

Deposit Reps 1569/335 - appendix 2 allocations

- met by FC67

Deposit Reps 1569/336 – editing / inconsistencies / minor points
- almost fully met by FC13, 44, 49, 52, 80. The policy 37 comment related to the policy wording itself not the justification.