



**For office use only**

Representor no.

Representation no.

**PREFERRED STRATEGY  
RESPONSE FORM**

Once you have read the draft Preferred Strategy for the Local Development Plan please let us know what you think by completing the form below.

**Please do not use this form to comment on candidate sites.**

For information regarding the examination of Local Development Plans please visit 'Guide to the Examination of Local Development Plans' (available on the Planning Inspectorate's website: [www.planning-inspectorate.gov.uk](http://www.planning-inspectorate.gov.uk))

**REPRESENTATIONS SHOULD BE RETURNED BY  
WEDNESDAY 6<sup>th</sup> MAY 2009**

**REPRESENTATIONS RECEIVED AFTER THIS DATE WILL NOT BE  
CONSIDERED**

**PART 1: YOUR DETAILS**

NAME: *Paul Wimbush*

JOB TITLE (if applicable): *Project Coordinator*

ORGANISATION (if applicable): *Lammas Low Impact Initiatives Ltd*

TEL. No(s):

E-MAIL: *paul.wimbush@lammas.org.uk*

ADDRESS AND POSTCODE: *Tegfan, Tan y rhiw, St Dogmaels, Cardigan,  
SA43 3HB*

## PART 2: VISION

Following discussions with stakeholders a vision statement for the LDP was agreed.

- Is the Vision distinct and relevant to Pembrokeshire?
- Does the Vision set out what sort of place we want Pembrokeshire to be?
- Is the Vision balanced between economic, social and environmental aims?

Please provide comments below:

*The vision as currently drafted is based on the continued supply of cheap fossil fuels and completely ignores peak oil.*

*The vision as currently drafted is completely irresponsible in that it disregards the need to address carbon pollution and the causes of climate change.*

*The only viable future for society is a low-carbon one and Pembrokeshire would be better off preparing for this now.*

*Pembrokeshire would be wise to move away from 'agricultural industry', which is heavily fossil fuel dependent and move towards smaller scale agricultural holdings, crop diversity and permaculture. WE would propose replacing the phrase 'agricultural industry' with 'agricultural diversity'.*

*For Pembrokeshire to continue to develop its fossil fuel capabilities would be short-sighted. 'Internationally important energy opportunities' should be replaced by 'renewable energy opportunities'.*

*The vision should be rewritten as:*

*'In 2021 Pembrokeshire will be a desirable place in which to live, work and visit. There will be strong sustainable communities supported by a robust, diverse, prosperous local economy **working towards a low-carbon future**. These will be based on the area's unique environment, cultural identity, maritime access, **agricultural diversity, renewable energy and green tourism opportunities.**'*

**(If necessary please continue on a separate sheet)**

**PART 3: OBJECTIVES**

The Preferred Strategy proposes 21 Objectives for the Local Development Plan. Please provide comments on the objectives.

- Are the Objectives clear?
- Will they deliver the aims of the LDP Vision and Objectives?
- Are there any Objectives that could be left out?
- Is there anything missing?

Please provide comments below (all comments must make reference to the corresponding paragraph and objective letter):

*The objectives as currently written would deliver **BUSINESS AS USUAL**. This would leave Pembrokeshire in a very vulnerable, ill-prepared position when it comes to the inevitable transition to a low-carbon society.*

*New objectives should include:*

- Tackling the causes of climate change as well as the effects.*
- Specific co2 reduction targets and monitoring procedures detailing how Pembrokeshire is to reduce co2 emissions by 80% by 2050. .*
- Supporting the development of localised land based economies.*
- Preparing the County for a future without a cheap plentiful supply of fossil fuels.*

*Objective F should read 'To maintain the existing road network within the County'*  
*Objective G should read 'To facilitate people's accessibility to goods and services by developing and supporting sustainable travel options.'*

*Objective J should read 'To support the sustainable development of the Pembrokeshire ports'*

*Objective U should read 'To encourage the development of the renewable energy sector'*

**(If necessary please continue on a separate sheet)**

## **PART 4: STRATEGIC POLICIES**

The Preferred Strategy proposes 16 Strategic Policies for the Local Development Plan.

- Are the Strategic Policies clear?
- Will they deliver the aims of the LDP Vision and Objectives?
- Are there any Strategic Policies that could be left out?
- Is there anything missing?

Please provide comments below (all comments must make reference to the corresponding paragraph and policy number):

*In the context of the current environmental assessments of climate scientists the policies as currently proposed need to properly address the move towards a low carbon economy by 2050 (90% reduction).*

*The strategic policies as proposed woefully fail in this respect, it is everyone's responsibility to take a lead on this issue, and not get caught up in making statements that appear to be green but in fact fail to outline specific targets and how they will be met in line with current science.*

*The policies should be rewritten in light of the comments above.*

- *Policy 52 (low-impact development) should be retained and promoted.*
- *There should be a policy that supports and promotes transition initiatives within the County, with the flexibility to respond to the democratic solutions put forward by local communities.*
- *There should be a policy that supports the renovation of existing housing stock away from dependence on fossil fuels towards low-carbon options.*

*To define 'sustainable development' simply as a 'development that provides positive social, environmental and economic benefit, whilst minimising adverse impacts' is to dilute the concept of sustainable development beyond its intended meaning. The definition of sustainable development should be rewritten to include the concept of using only a fair share of the earth's resources (as suggested in the recent WAG One Wales: One Planet document).*

(If necessary please continue on a separate sheet)

## PART 5: SCALE AND DISTRIBUTION OF FUTURE GROWTH

A medium/high level hybrid growth option was developed resulting in 4700-6000 additional dwellings being proposed for the plan area between 2011 and 2021. The spatial development option adopts a 50% hub towns, 50% rural split of development.

- Do you agree with the scale of growth proposed? (Please tick)

Agree

Disagree

Neither agree nor disagree

Please provide comments below:

*Agree.*

*We would expect to see increased numbers of people coming to live in the County as a result of the forthcoming transition.*

- Do you agree with the broad spatial distribution of growth proposed? (Please tick)

Agree

Disagree

Neither agree nor disagree

Please provide comments below:

*Disagree.*

*We believe that there should be more rural new housing in order to position people closer to their supporting resources (land, water, renewable energy, food etc) and also to more efficiently manage the land resource in a future without cheap and plentiful energy supplies.*

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**PART 6: COMMENTS ON SUSTAINABILITY APPRAISAL SUMMARY**

If you have any comments on the non-technical summary of the Initial SA Report in Chapter 10 please list below (all comments must make reference to the corresponding paragraph). Should you wish to comment on the detailed Initial SA Report, please do so using the form in the Initial SA Report.

*The Sustainability Appraisal should be primarily based on Ecological Footprinting*

**(If necessary please continue on a separate sheet)**

**PART 7: FURTHER COMMENTS**

If you have any further comments on the Preferred Strategy, or the supporting documents please list below (all comments must make reference to the corresponding paragraph and policy number).

*The preferred strategy as proposed seems to completely ignore current scientific consensus on the need for society to undergo swift and radical change.*

(If necessary please continue on a separate sheet)

## PART 8: FUTURE STAGES

Please tick here if you wish to be notified of future stages of the LDP, including the date on which the LDP is submitted to the Welsh Assembly Government for examination and the date on which the plan is adopted.



Please specify the address for these notifications:

Yes

By e-mail; *paul.wimbush@lammas.org.uk*

We would also appreciate your views on the consultation process for the LDP Preferred Strategy.

- How satisfied are you with the consultation process? (Please tick)

Very satisfied

Satisfied

Dissatisfied

If you are dissatisfied, how would you like to see the consultation process changed?

*Dissatisfied*

*The consultation process is completely user- unfriendly. The language is difficult to understand, the format complicated and the processes for feedback very constrained.*

THANK YOU FOR YOUR COMMENTS ON THE PREFERRED STRATEGY

Completed forms should be returned to:  
Development Plans team  
Pembrokeshire County Council  
County Hall  
Haverfordwest  
Pembrokeshire  
SA61 1TP