Representations Reports | Part 2

Please note responses to representations can be found in:

- **‘Representations Report’ – Part 2**
- **‘Internal Representations Report’ – Part 3**
- **‘Issues Report’ – Part 4.**

Part 1 provides an alphabetical index of representors and provides an index of where each representation is dealt with.

Pembrokeshire County Council

Pembrokeshire Local Development Plan 2 Deposit 2

17 July 2025

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Local Development Plan General

Representor Number	Representor	Agent	Representation	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
2180	Neyland Town Council		1	DP General	Comment	No comment	**Housing and Affordable Housing:** Areas of concern outlined in relation to the level of housing provision required to reflect local need. Comments are provided on the allocation included in the Local Development Plan at Poppy Drive and also raises the question of further expansion to the West. Comments provided on the need for more affordable housing provision and the need to prioritise local housing needs. The importance of securing S106 agreements for delivering community benefit is important. See detailed response.	Neyland			The amendment suggested is not supported by the Plan's evidence base.		Local Housing Market Assessment (LHMA) 2021 - Appendix 5. Neyland had a need for 120 residential units, between a mix of open market and affordable dwellings. Annual monitoring reports (AMRs) show that 34 units have since been built. The Deposit LDP2 has allocated for 101 affordable units in Neyland and expects the delivery of windfall units to contribute 23 units. The evidence suggests that the plan has made sufficient provision for Neyland. A future development plan would consider growth areas for the future.	No			
4339	National Gas Transmission	Avison Young (4267)	1	DP General	Comment	No comment	If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us. To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Gas Transmission wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult National Gas Transmission on any Development Plan Document (DPD) or site-specific proposals that could affect National Gas Transmission's assets.			Comment noted. No change required.				No			
1507	Welsh Government		1	DP General	Comment	No comment	**We expect the core elements of the Manual, in particular Chapter 5 and the 'De-risking Checklist(s)' to be followed.** Failure to comply with these key requirements may result in unnecessary delays later in the plan making process.			Agree			Officers have completed the de-risking checklist.	No			
1556	Carew Community Council		1	DP General	Comment	No comment	Carew Community Councillors reviewed the LDP 2 plans and supplementary guidance at their recent meeting. There were no adverse comments and all maps appear			Comment noted. No change required.				No			

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							representative of the developments within the villages and amenity open spaces in the Carew Parish area.										
4379	T Cormack		1	DP General	Comment	No comment	I'm writing by email because your online form doesn't allow enough characters for my comments. I would also point out that the Deposit Plan link went to the wrong document when I first tried to comment some weeks ago, so I've only today had access to the actual plan, which is disappointing.			Comment noted. No change required.			Officers were unaware of the difficulties encountered but would have been available to assist. It is good that the representor was able to submit comment during the consultation period.	No			
4403	National Grid South West	Agent Lucy White Planning Ltd(4232)	1	DP General	Comment	No comment	Generic advice on ensuring grid connection is available for the local planning authority area. See representation for detail.			Agree no change required.				No			
2180	Neyland Town Council		2	DP General	Comment	No comment	**Infrastructure and Transport:** Areas of concern highlighted are a strain on the current transport network in Neyland, improving the road network and sustainable transport. Further housing development will exacerbate these matters. The longer-term needs of Neyland Community School will need to be addressed with some classes at capacity. Comments are also made in terms the role of Milford Haven secondary school. See detailed response.	Neyland			The amendment suggested is/can be addressed through supplementary planning guidance.		The Development Sites and Infrastructure Supplementary Planning Guidance is due to prepared to support the Plan on adoption. This document will detail any financial contributions required for sustainable travel and education capacity by allocated sites. Draft Supplementary Planning Guidance will be consulted upon with Community and Town Councils.	No			

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4005	National Grid Electricity Transmission	Avison Young (4267)	2	DP General	Comment	No comment	NGET is happy to provide advice and guidance to the Council concerning their networks. Please see attached information outlining further guidance on development close to National Grid assets. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us. To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, NGET wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult NGET on any Development Plan Document (DPD) or site-specific proposals that could affect our assets. NGET is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets. Developers of sites crossed or in close proximity to NGET assets should be aware that it is NGET policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance. NGET's 'Guidelines for Development near pylons and high voltage overhead power lines' promote the successful development of sites crossed by existing overhead lines and the creation of welldesigned places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: https://www.nationalgridet.com/document/1			Comment noted. No change required.				No			

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							30626/download. The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site. NGET's statutory safety clearances are detailed in their 'Guidelines when working near National Grid Electricity Transmission assets', which can be downloaded here: www.nationalgridet.com/network-and-assets/working-near-our-assets									
1507	Welsh Government		2	DP General	Comment	No comment	After considering the key issues and policies in Future Wales, the Welsh Government is of the opinion that t**he Second Deposit Plan is in general conformity with Future Wales: The National Development Framework.** *The Welsh Government is of the opinion that the Pembrokeshire County Council Replacement Local Development Plan (2022-2033) Second Deposit Plan is in general conformity with the National Development Framework: Future Wales, as set out in paragraphs 2.16 – 2.18 of the Development Plans Manual (Edition 3). This conformity statement is based upon the evidence currently available. The Welsh Government supports the Swansea Bay City Deal but it is currently unclear how the wider region and adjoining Local Authorities have been involved in shaping the scale of choices made in the plan.* ***The plan would benefit from further evidence to demonstrate how regional collaboration has influenced the scale of growth in Pembrokeshire.*** **Annex 1 - Statement of General Conformity** **Reasons**			Comment noted. No change required.			The Local Development Plan sets out the 'Regional Context' covering the Council's partnership working on Swansea Bay City Deal and Celtic Freeport, liaising on Strategic Development Plan preparation and also how the Council has sought to engage neighbouring authorities in Plan preparation through stakeholder engagement and through liaising on various evidence based documentation including: Retail Assessments, Housing Market Assessments, Gypsy Traveller Accommodation Assessments, Viability work, Strategic Flood Consequences Assessment, Green Infrastructure Assessment, waste and minerals planning and dealing with phosphate issues. PCC worked with Carmarthenshire County Council on a Two County Economic Study, the outcomes of which underpin employment policies in both the	No			

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							Future Wales places emphasis on the development of Regional Growth Areas in a sustainable manner. Growth areas must be sustainably planned, reduce the need to travel by car, encourage walking and cycling (active travel), maximise public transport usage and incorporate green infrastructure. Growth areas must embed these principles within a wider regional consensus, focussing on the opportunities they bring to promote social and economic benefits across a broader geographical area. **The Welsh Government supports sustainable growth in Regional Growth Areas to respond to the climate change and biodiversity emergencies, making the best use of resources.** Policy 1 and Policy 29 of Future Wales states that the regional growth areas centred around the Haven Towns will be the main focus for growth and investment in the region, strategic diagram (p145). **The plans spatial strategy aligns with this approach.** Future Wales brings a new perspective that all LDPs have to embrace on how each plan sits within the region as a whole and the relationship to other LDPs, in essence, a strategic approach to cross boundary relationships in advance of the formal commencement of an SDP. The Welsh Government supports the Swansea Bay City Deal providing opportunities to focus on increasing economic prosperity through joint working. **However, it could be clearer how the wider region, particularly Pembrokeshire National Park Authority, Carmarthenshire and Ceredigion have been involved in shaping and agreeing the scale and spatial choices made and the consequences of any decisions taken by Pembrokeshire for other plans in the region and future SDP, including not prejudicing future options. The WG notes a background has been prepared on wider working, but**						emerging replacement LDPs. PCC also engaged with and contributed to a sub-regional commission relating the the Swansea Bay and Llanelli National Growth Area Definition Project in 2022. PCC chairs the Cleddau Nutrient Management Board, the management of which takes place on a sub-regional basis, alongside the Teifi and Tywi NMBs. It was intended that a regional Statement of Common Ground would be prepared by planning authorities but this has not progressed beyond a draft stage. Nevertheless, neighbouring authorities continue to work together on cross boundary issues and the content of their plans reflect this. For this Council's Local Development Plan 2 Deposit Plan 2 only representations from the Pembrokeshire Coast National Park Authority require dealing with through this process.				

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							this primarily relates to the neighbouring National Park Authority and not the wider region. Further articulation would assist in justifying the role that Pembrokeshire has in the region and assist the examination process. This is not a general conformity issue. On balance, (and subject to the comments in Annex 2), **the Welsh Government considers that the Second Deposit Plan, including the scale and distribution of growth, is in general conformity with key policies in Future Wales namely** (not exhaustive): Policy 1: Where will Wales grow Policy 2: Shaping Urban Growth and Regeneration – Strategic Placemaking Policy 6: Town Centre First Policy 10: International Connectivity Policy 12: Regional Connectivity Policies 17 & 18: Renewable and Low Carbon Energy Developments of National Significance Policy 29: Regional Growth Areas – Carmarthen and the Haven Towns Policy 32: Haven Waterway and Energy									
2180	Neyland Town Council		3	DP General	Comment	No comment	**Environmental Considerations:** It is essential that the L.D.P. takes steps to preserve the natural environment. Neyland is home to a number of important natural areas, including the Cleddau River and Waterway, which must be protected from over-development. We ask that the Plan recognises local environmental preservation, including the protection of green spaces and bio-diversity. Neyland has recently become part of a nationwide Nature's Neighbourhood Scheme, in which the local community are encouraged to protect the Town's natural environment, with particular reference to future generations. Detailed comments are provided regarding the need to protect local green spaces in Neyland including woodland behind Poppy Drive. Comment is also provided on sewerage capacity.	Neyland		Agree no change required.			Policy GN 52 designates woodland as amenity open space to protect these areas, which includes the woodland along Westfield Pill. Additionally, GN 43 protects trees and GN 45 specifically protects green infrastructure.	No			

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1507	Welsh Government		3	DP General	Comment	No comment	**I would urge you to seek your own legal advice to ensure you have met all the procedural requirements, including the Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA), as responsibility for these matters' rests with your authority.** A requirement to undertake a Health Impact Assessment (HIA) arising from the Public Health (Wales) Act 2017, if appropriate, should be carried out to assess the likely effect of the proposed development plan on health, mental well-being, and inequality.			Comment noted. No change required.			A Sustainability Appraisal including a Strategic Environmental Appraisal and a Habitats Regulations Assessment was completed in accordance with the regulations and requirements. A separate Health Impact Assessment was not considered to be required as the LDP 2 has been tested against the Sustainability Appraisal objective: 2. '*Promote and improve human health and well-being through a healthy lifestyle, access to healthcare and recreation opportunities and a clean and healthy environment.*'	No			
2180	Neyland Town Council		4	DP General	Comment	No comment	**Economic Development:** Whilst Neyland has a vibrant marina, more can be done to encourage growing the number of small businesses and encourage new enterprises. A detailed submission is provided on the need for policies to support local business, the creation of more commercial space and regeneration of the town centre. Growth needs to be of a compatible scale. The L.D.P. makes reference to the land north of Honeyborough Industrial Estate; this land, although beneficial to the Town, provides no benefits to the Town Council as this is situated in Llanstadwell Community Council's ward area.	Neyland		Agree focussed change needed.			No Candidate Sites were submitted for consideration as there is sufficient land with employment use within the locality. Whilst administratively Honeyborough Industrial estate lies within the neighbouring Community Council, it is considered to be well-related to the settlement of Neyland as identified by LDP2. Allocation ref. EMP/093/00001 provides the potential for economic development that would benefit Neyland. A change to GN 8 is nonetheless required to ensure that vacant plots within the industrial estate would be supported by the policy. In terms of the Town Centre, Neyland is identified as a Local Centre by policy SP 16 Retail Hierarchy. Policy GN 31 (Town Centre and Local Retail Centre Development) is supportive of new commercial uses within the Local Retail Centre that would support regeneration initiatives.	Yes			FC5.GN08.01

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4421	Defence Infrastructure Organisation (DIO)		4	DP General	Comment	No comment	Penally Camp also falls within the plan area and is identified on the DIO Disposals Database in the House of Commons library for disposal by 2024. It should be noted that Avison Young have been appointed by MoD to make separate representations in respect of this site.	Penally		Comment noted. No change required.				No			
34758	Eglwyswrw C Council		4	DP General	Comment	No comment	**Map 3 Site 272** – We would support the development of this site for tourism and hospitality in the interest of sustaining a current tourist attraction site and to provide new sustainable economic opportunities within the period of LDP2.	Postgwyn	Candidate Site Reference 272	Comment noted. No change required.			Candidate Site 272 has been submitted with a proposed use of holiday accommodation. These types of tourism-based proposals were not assessed in the candidate site assessment process. This site can be submitted as a planning application and assessed either under current LDP 1 policies or LDP 2 once it has been adopted.	No			
2180	Neyland Town Council		5	DP General	Comment	No comment	**Community Amenities:** There is a clear need for investment in public amenities, particularly recreational facilities for young people and additional healthcare services. Detailed comments are provided on community space provision, the adequacy of healthcare facilities for the growing population, the adequacy of recreational facilities and educational facilities.	Neyland		Agree no change required.			Healthcare provision is a matter for the local heath board to consider, which sits outside of the scope of the consultation. The Council is drafting a Development Sites and Infrastructure SPG, which will detail any on-site play area requirements and any financial contributions required for existing play areas in the locality.	No			
34751	Amroth Community Council		7	DP General	Comment	No comment	6. PCC and National Park Planning Policy The Amroth Community Council area also incorporates the Pembrokeshire Coast National Park on the coast. Councillors request that planning decisions by PCC and PCNPA are based on consistent Policy, especially in dealing with the provision of holiday accommodation.			In terms of defining concentrations of fast-food take-aways, this will need to be assessed on the particular character and location of the locality.			Pembrokeshire County Council and Pembrokeshire Coast National Park Authority are separate local planning authorities. Planning decisions within the jurisdiction of each Authority will need to be based on their own Local Development Plan and on the individual merits of each planning application. The current National Park LDP and the Deposit Plan use a landscape character assessment as the basis for policies relating to camping and caravanning which may help to provide consistency across the two areas.	No			

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1745	Cilgerran Community Council		8	DP General	Object	No comment	**Croft Sites 209 & 480** - Members would support the development of both sites for residential development on the strict criteria the development is associated to aid on-site employment only. Members would not support open market housing on both sites as it would constitute residential development in open countryside and would be an abuse of national planning policy. Members recognise the valuable contribution that both current businesses associated with the sites provide in sustaining the economic community of the area. **See original representation for map included.**	Proposal Map & Inset Map Key	Candidate Site 209 & 480	Comment noted. No change required.			Candidate Sites 209 and 480 were proposed for residential use and considered in the Candidate Site Assessment. The sites were screened out as they were not within 250m of a Service Village, Service Centre or Main Town or adjacent to a Cluster Local Village. Proposals for residential development in such locations are not supported by the Deposit Plan.	No			
2603	Dwr Cymru		19	DP General	Comment	No comment	**Appendix – representation on allocations General caveats: •** Where there are no public sewerage facilities available near sites then the use of non-mains sewerage may be required. In such cases the provisions of WG Circular 008/2018 "Planning requirements in respect of the use of private sewerage in new development, incorporating septic tanks and small sewage treatment plants" apply and consultation with Natural Resources Wales would be required. • Dwr Cymru Welsh Water always has rights of access to its assets. Where there are sewers and/or water mains crossing sites then protection measures in respect of these assets will be required, usually in the form of an easement width or in some instances a diversion. This has the potential to impact the achievable development density onsite. • In those locations where insufficient hydraulic capacity exists within the public sewerage network or water supply to accommodate/serve the development site, hydraulic modelling assessments (HMA) may be required at the developer's expense to establish suitable connection points and/or necessary reinforcement works to enable the sites to connect. Surface water removal could be an alternative option for allocations where			Agree no change required.			These detailed provisions can be usefully included in the draft Development Sites and Infrastructure Supplementary Planning Guidance.	No			

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							foul sewer HMAs are being requested, we would welcome early engagement with the site developer. • In some instances, off-site water mains or public sewers may be required to connect to a suitable point on the existing networks at the developers' cost. Where assets need to be laid over private land, developers will need to comply with the requisition provisions of the Water Industry Act 1991. • Where there is limited capacity at a Wastewater Treatment Works (WwTW), dependant on the scale and timing of development, developers may need to fund the undertaking of a Development Impact Assessment (DIA) to identify required reinforcement works. In these instances, a s106 commercial agreement would be required between the developer and Welsh Water to deliver the necessary improvements. • The Local Planning Authority will need to consult Dwr Cymru Welsh Water when an application is submitted to gain formal confirmation that there is capacity in place at the receiving Wastewater Treatment Works (WwTW) to accommodate the additional wastewater in compliance with revised permit limits, and to satisfy planning guidance published by Natural Resources Wales that the WwTW is currently operating in compliance with its flow permit conditions where applicable. A Grampian planning condition may be required to ensure that timing of development corresponds with delivery of improvements at the WwTW. • If a site is near to a Sewage Pumping Station (SPS) we would recommend that the LPA discuss the potential allocation with their Environmental Health Department to establish whether there is the potential for odour nuisance for future occupiers. • Regarding any usage other that residential, we would need to know the end use before we could provide definitive comments, as									

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							matters such as staff numbers and whether additional water supply is required for an industrial process may impact on the capabilities of the network. • Should any proposal require to discharge trade effluent into the public sewer then the Consent of the statutory sewerage undertaker is required (Section 118 Water Industry Act 1991). Additionally, dependant on the processes involved, an element of pre-treatment may also be required. • Where capacity is currently available in the water supply system to accommodate development, we reserve the right to reassess our position at the time of the formal application for the provision of new water mains under Section 41 and Section 51 of the Water Industry Act (1991) to ensure there is sufficient capacity available to serve the development without causing detriment to existing customers' supply as demands upon our water systems change continually. • Please note the below comments are subject to change as the LDP progresses and/or as planning applications are submitted.									
34450	Natural Resources Wales		31	DP General	Support	No comment	**Nutrients -** We welcome the overall approach set out in the Deposit Plan and HRA where the importance of protecting the river environment is recognised (as a statutory obligation anyway) and considered in the strategic planning process and we have no concerns with what has been set out, as it is consistent with legislation and our planning advice. The HRA very much focuses on site screening particularly in relation to those sites connecting to the public sewer where the associated Waste water Treatment Works has a revised environmental permit and identifies sites not falling within this category where a project level HRA will be required. In summary we are satisfied with the			Support welcomed. No change required.				No			

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							approach taken by Pembrokeshire County Council regarding nutrients.										

1.0 to 3.0 Inclusive Context, Vision Objectives and Strategy

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4387	PRL Partnership	Lichfield (4409)	1	DP LDP Vision	Object	No	Despite emerging Objective C of the draft LDP, the Vision appears to limit the opportunities from tourism simply to employment opportunities: "Employment opportunities linked to start-up businesses, tourism, rural diversification, the green and blue energy industry and new sectors linked to the strategic opportunities provided by the Milford Haven Waterway and links to Ireland are promoted." Tourism must be viewed beyond just employment opportunities. Tourism contributes to the wider economy and development provides opportunities to support the local environmental and built heritage. The demands of visitors are constantly changing, and so policy must be sufficiently flexible to provide for an evolving sector. The changes require the development and redevelopment of premises and facilities to keep attracting new and repeat visitors to the area. The infrastructure to support the visitor economy requires regular review. The safeguarding and potential for increased visitor spending across the county, particularly from high quality developments, supports the socioeconomic foundations of the resident community. At the moment the vision fails to recognise the role of the sector beyond the employment opportunities. PPW states that "the planning system encourages tourism where it			Agree focussed change needed.				Yes			FC2.Vision.01

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							contributes to economic development, conservation, rural diversification, urban regeneration and social inclusion, while recognising the needs of visitors and those of the local communities." (paragraph 5.5.2). This vision includes aspects of PPW but further emphasis on visitor and community needs to be drawn upon to provide a clear foundation for all other aspects of the emerging plan. As such, the following amendment is suggested: "~~Employment~~ Opportunities linked to start-up businesses, tourism, rural diversification, the green and blue energy industry and new sectors linked to the strategic opportunities provided by the Milford Haven Waterway and links to Ireland are promoted."												
4388	Haven Leisure Ltd	Lichfields (4409)	1	DP LDP Vision	Object	No	Despite emerging Objective C of the draft LDP, the Vision appears to limit the opportunities from tourism simply to employment opportunities: "Employment opportunities linked to start-up businesses, tourism, rural diversification, the green and blue energy industry and new sectors linked to the strategic opportunities provided by the Milford Haven Waterway and links to Ireland are promoted." Tourism must be viewed beyond just employment opportunities. Tourism contributes to the wider economy and development provides opportunities to support the local environmental and built heritage. The demands of visitors are constantly changing, and so policy must be sufficiently flexible to provide for an evolving sector. The changes require the development and redevelopment of premises and			Agree focussed change needed.				Yes			FC2.Vision.01

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							facilities to keep attracting new and repeat visitors to the area. The infrastructure to support the visitor economy requires regular review. The safeguarding and potential for increased visitor spending across the county, particularly from high quality developments, supports the socioeconomic foundations of the resident community. At the moment the vision fails to recognise the role of the sector beyond the employment opportunities. PPW states that "the planning system encourages tourism where it contributes to economic development, conservation, rural diversification, urban regeneration and social inclusion, while recognising the needs of visitors and those of the local communities." (paragraph 5.5.2). This vision includes aspects of PPW but further emphasis on visitor and community needs to be drawn upon to provide a clear foundation for all other aspects of the emerging plan. As such, the following amendment is suggested: "~~Employment~~ Opportunities linked to start-up businesses, tourism, rural diversification, the green and blue energy industry and new sectors linked to the strategic opportunities provided by the Milford Haven Waterway and links to Ireland are promoted."									

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4326	Mr M Bell		1	DP 3. PLAN STRATEGY	Object	No	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. **A detailed rationale is provided by the representor justifying the need to make this change - please see original representation for the full detail.** In summary, reference is made to Welsh Government's "Prosperity for All: A Low Carbon Wales", Pembrokeshire County Council's declaration of a Climate Emergency in 2018, the RTPI's publication of "The Planner" in October 2019, recent research by RTPI published in The Guardian 6th November 2024 and the Welsh Government's original representation to the Preferred Strategy of LDP 2. A 70:30 split 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 would have assisted with the costs of providing services (health and social care, recycling, bus services as well as infrastructure provision, for example waste water treatement). Policy GN 12 of the first Deposit Plan would indicate a lack of intent regarding responding to the Council's own climate emergency.				The amendment suggested is not supported by the Plan's evidence base.		The urban / rural apportionment for residential development was set at an early stage in the Plan process. Various potential approaches were examined at that time, including the one proposed by this representor. There is no perfect choice on this matter, but the choice and sometimes the reasons why PCC has chosen the 60% / 40% split for residential allocations is set out in LDP 2 Preferred Strategy, in the Spatial Strategy Background Paper (2019), in the Housing Requirement Background Paper (2023) and the Housing Supply and Trajectory (2024). LDP 2, Deposit Plan 2 also refers to this matter, for instance on pages 13 and 35/36, the latter providing an explanation for the choice made. The provision of growth opportunities for both urban and rural communities is highlighted, as is deliverability and an approach of directing future growth to settlements with good levels of services - see paragraph 3.14. Whilst WG has commented on this choice and the other alternatives available earlier in the process, it has not objected to LDP 2, Deposit Plan 2 in this regard.	No			

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34485	Pembrokeshire Coast National Park Authority		1	DP 3. PLAN STRATEGY	Support	No comment	Urban/Rural Split of Allocations: Paragraph 3.13 Both the adopted LDP 2 for the PCNPA and the Re-Deposit Plan for PCC plan direct a higher level of development to the larger centres. The PCNPA supports the proposed 60/40% split between Urban Settlements which includes the Regional Growth Areas and the Rural Settlements in the Re-Deposit LDP 2. Support the conformity of approach.			Support welcomed. No change required.				No			
4393	Welsh Government Place Division, Housing and Regeneration Directorate	Lichfields (4394)	1	DP 2. VISION AND OBJECTIVES	Support	Yes	Detailed submission of support provided.			Support welcomed. No change required.				No			
34450	Natural Resources Wales		1	DP 1. CONTEXT AND KEY ISSUES	Object	No comment	**Page 20 Key characteristics –** Rivers such as the Western Cleddau (for instance in Haverfordwest), the Ritec and the lower Teifi are prone to flooding, as are many coastal areas of Pembrokeshire. The Riverine SACs of the Eastern and Western Cleddau and the Teifi are known to have high levels of phosphates and in 2021 NRW published new guidance in connection with this to protect the special features for which these river catchments have been designated. Concentrations of Nitrates in the Haven Waterway in Pembrokeshire is also a concern and there are proposals to widen Nitrate Vulnerable Zones in Wales…….Nitrate vulnerable zones are no longer applicable or designated in Wales. In April 2021 the designated NVZs in Wales were revoked by the introduction of the Water Resources (Control of Agricultural Pollution)(Wales) Regulations with some measures transitioning into law over a period of time. The transition periods do not apply to those farms located in			Agree focussed change needed.			The bullet point referred to on page 20 of LDP 2, Deposit Plan 2 requires amendment, as the current wording is inaccurate and out-of-date. This can be achieved by removing the reference to widening NVZs in Wales and replacing it with the text provided by NRW.	Yes			FC1.Context.03

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							previously designated NVZ where all the measures within CoAPR apply immediately. This text requires correction.										
4387	PRL Partnership	Lichfield (4409)	2	DP Objective C	Support	Yes	PRL Partnership endorses the LDP objectives in particular Objective C which expresses PCC's aim to encourage employment. PRL welcomes the acknowledgement of the contribution that the visitor economy makes to the local economy and the emphasis on sustaining and enhancing the rural and urban economy through (inter alia) the visitor economy is welcomed. The adopted LDP (paragraph 3.16) acknowledges that tourism is the largest industry and employer in Pembrokeshire but notes that many of these jobs are seasonal in nature. Continued support regarding the visitor economy is accepted to enable the sector to continue to thrive. Planning Policy Wales (PPW) notes at paragraph 5.1.1 that tourism is "vital to economic prosperity and job creation in many parts of Wales". It also states at paragraph 5.5.3 that, in rural areas, tourism-related development is "an essential element in providing for a healthy, diverse, local and national economy". This is certainly the case in Pembrokeshire, as recognised at paragraph 3.16 in the adopted LDP, which states that the tourist industry is the largest industry and employer in the county. PRL Partnership therefore considers that it is important for the Draft Objectives for the Replacement LDP to provide support for employment opportunities linked directly and indirectly to tourism. Accordingly, Objective C aligns with			Support welcomed. No change required.				No			

Representor Number	Representor	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit ..	Other Edit No.	See Focussed Change (FC) No.
							national policy and thus meets the first test of soundness.										
4388	Haven Leisure Ltd	Lichfields (4409)	2	DP Objective C	Support	Yes	Haven Leisure Ltd endorses the LDP objectives an particular Objective C which expresses PCC's aim to encourage employment. PRL welcomes the acknowledgement of the contribution that the visitor economy makes to the local economy and the emphasis on sustaining and enhancing the rural and urban economy through (inter alia) the visitor economy is welcomed. The adopted LDP (paragraph 3.16) acknowledges that tourism is the largest industry and employer in Pembrokeshire but notes that many of these jobs are seasonal in nature. Continued support regarding the visitor economy is accepted to enable the sector to continue to thrive. Planning Policy Wales (PPW) notes at paragraph 5.1.1 that tourism is "vital to economic prosperity and job creation in many parts of Wales". It also states at paragraph 5.5.3 that, in rural areas, tourism-related development is "an essential element in providing for a healthy, diverse, local and national economy". This is certainly the case in Pembrokeshire, as recognised at paragraph 3.16 in the adopted LDP, which states that the tourist industry is the largest industry and employer in the county. PRL Partnership therefore considers that it is			Support welcomed. No change required.				No			

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							important for the Draft Objectives for the Replacement LDP to provide support for employment opportunities linked directly and indirectly to tourism. Accordingly, Objective C aligns with national policy and thus meets the first test of soundness.										
4390	Lidl GB Ltd	Carney Sweeney (4391)	2	DP 2. VISION AND OBJECTIVES	Object	No	Detailed submission commenting on objectives 'C', 'D' and 'I'.				The amendment suggested is already addressed by the Plan,. No change is needed.		This representation says that the Vision and Objectives of the Plan, specifically items C, D and I, should be modified to make specific reference to the relationship with the Pembrokeshire Coast National Park Authority. Page 17 of LDP 2, Deposit Plan 2, says that 'The Plan should be seen and read as a whole'. In that context, there is a specific section of the Plan titled 'Neighbouring Planning Authorities' which specifically addresses the relationship between PCC as a Local Planning Authority and its neighbour LPAs, including Pembrokeshire Coast National Park Authority - see paragraph 1.19. Amongst other things, this notes that 'PCC is committed to working collaboratively with its neighbouring authorities and a number of joint pieces of evidence have been produced. All neighbouring authorities attend Pembrokeshire's Key Stakeholder Panel and are involved in advising on the emerging LDP. Statements	No			

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													of Common Ground have been produced with neighbouring Authorities and are published as part of the Plan's evidence base'. In that context, it is PCC's view that the matter raised is dealt with elsewhere in the Plan and that the Vision and Objectives do not need to be modified to reiterate what has already been set out.				
34450	Natural Resources Wales		2	DP 1. CONTEXT AND KEY ISSUES	Object	No comment	**Page 25 - Local Context – Pembrokeshire** – The agricultural sector is facing structural change with the increasing growth of larger farm units. Major challenges include Nitrate Vulnerable Zones (NVZs) designation, bovine TB, loss of farm subsidies (EU), concerns over run-off of other nutrients and changes in global markets. This text requires changing, as above.			Agree focussed change needed.			The bullet point referred to on page 25 of LDP 2, Deposit Plan 2 requires amendment, as the current wording is inaccurate and out-of-date. This can be achieved by removing the reference to NVZs and replacing it with the text provided by NRW.	Yes			FC1.Context.05
34450	Natural Resources Wales		3	DP PROTECTING OUR ENVIRONMENT	Object	No comment	**Page 28 – Protecting our Environment** -Intensification of agricultural practices may have impacts on the environment, including nutrient run-off into water courses. The introduction of Nitrate Vulnerable Zones is one response to this. This text requires changing, as above.			Agree focussed change needed.			The bullet point referred to on page 28 of LDP 2, Deposit Plan 2 requires amendment, as the current wording is inaccurate and out-of-date. This can be achieved by removing the reference to NVZs and replacing it with the text provided by NRW.	Yes			FC1.Context.04
1507	Welsh Government		4	DP 3. PLAN STRATEGY	Comment	No comment	**Housing Growth Level** The plan seeks to deliver a requirement 5,840 homes and 1,970 new jobs (plus an additional initial 1,000 through the Freeport) over the 16 year plan period, with a housing provision for 6,425 dwellings. The authority commissioned Edge Analytics to consider a range of demographic forecasts (with an update paper 'Housing Requirement			Comment noted. No change required.				No			

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							Background Paper' published 2023) based on the Welsh Government's 2018 based population/household projections as well as dwelling-led scenarios and an employment-led forecast, to address Welsh Government's previous concerns. This also took into account the 2021 Census results, the 2022 Local Housing Market Assessment and the results from the authority's annual housing surveys. The plan requirement of 5,840 dwellings in Policy SP2 (365/annum) is closely aligned with the past five years (413/annum – 2014/2019) and 10 years (378/annum – 2009/2019) average build rates. In Pembrokeshire, natural growth is negative with deaths exceeding births. The latest 2018 based household projections indicate an average build rate of approximately 271 dwellings/annum, resulting in a total of approximately 4,336 dwellings over the plan period. The plan requirement is set 1,504 dwellings higher than the 2018 based projections. The Haven Towns (Haverfordwest, Milford Haven, Pembroke and Pembroke Dock) are identified in Future Wales (Policy 29) as part of a Regional Growth Area which supports sustainable growth and regeneration in Carmarthen and the Pembrokeshire Haven Towns. These areas will be a focus for managed growth, reflecting their important sub-regional functions and strong links to the national growth areas of Swansea Bay and Llanelli. Local Development Plans should recognise the roles of these places as a focus for housing, employment, tourism,									

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							public transport and key services within their wider areas and support their continued function as focal points for sub-regional growth. • Policy 10 (FW) identifies the Haven Waterway (including the Ports of Pembroke Dock and Milford Haven) and Fishguard Port as 'strategic gateways to facilitate international connectivity'. • Policy 32 (FW) specifically relates to the Haven Waterway and states "the Welsh Government supports operations at Haven Waterway and recognises its location for potential new renewable and low carbon energy related development, innovation and investment'. The combination of these policies, as well as the need to deliver on affordable housing issues and address demographic imbalances, the Welsh Government would expect the housing requirement level to be above the 2018 projections. **The Welsh Government supports a housing requirement above the 2018 WG projections, the exact level is for the LPA to justify.**										
34450	Natural Resources Wales		4	DP 2. VISION AND OBJECTIVES	Support	No comment	**LDP vision –**Within the Vision of the Plan we are supportive of the inclusion of "…….*Across the County green infrastructure and biodiversity are enhanced with accessible and healthy environments delivered for both people and wildlife.*"			Support welcomed. No change required.				No			
1507	Welsh Government		8	DP 3. PLAN STRATEGY	Comment	Yes	**Spatial Distribution and Settlement Hierarchy** The spatial strategy aims to deliver 60% of homes in the urban areas (identified in Tier 1 of the settlement hierarchy), and 40% to the rural settlements. This is split down by			Agree focussed change needed.				Yes			FC5.GN13.01

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							settlement tier(Appendix 2, Table F). The Draft Development Plans Manual (Edition 3) states authorities include Table 16, 'Summary of spatial distribution of housing' to demonstrate how all the components of supply (allocations, commitments and windfalls) make up the total plan provision and how they will be spatially distributed. **The LDP has a remaining reference to 'hamlets' (paragraph 5.83) which should be deleted as these are no longer referenced in the settlement hierarchy.The Welsh Government is content that previous representations have been addressed and the plan is compliant with the DPM and national planning policy.**										
1507	Welsh Government		10	DP 3. PLAN STRATEGY	Comment	Yes	**Employment Provision** Policy SP5 allocates 164.91ha of employment land (elements of which have been completed) comprised of 122.16ha on strategic employment sites (Policy SP14) and 42.75ha on local employment sites (Policy GN9). The two-county economic study identifies that most of the strategic employment sites are key existing sites related to port operations. These existing sites are not new allocations and have been identified in a safeguarding policy (Policy SP15) totalling 868.57ha. This complies with Table 22 of the Draft Development Plans Manual (Edition 3). Employment Provision Policy SP5 identifies the delivery of 1,970 jobs over the plan period, plus an additional 1,000 jobs from the Celtic Freeport, with growth projected in health, accommodation and food			Comment noted. No change required.				No			

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							services and retail. **The Welsh Government is content that previous representations have been addressed and the plan is compliant with the DPM and national planning policy.**										

4.0 Policy SP 01 Creating Sustainable Places

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4326	Mr M Bell		2	DP SP 1 Creating Sustainable Places	Object	No	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.				The amendment suggested is already addressed by the Plan,. No change is needed.		It is suggested that the 'forefront' of the policy is its title, which is 'Creating Sustainable Places'. The suggested revision to wording is essentially a re-ordering of the key words and whilst possibly slightly better phrased would not add or detract from what has already been drafted.	No			
4393	Welsh Government Place Division, Housing and Regeneration Directorate	Lichfields (4394)	2	DP SP 1 Creating Sustainable Places	Support	Yes	Detailed submission of support provided.			Support welcomed. No change required.							
34485	Pembrokeshire Coast National Park Authority		2	DP SP 1 Creating Sustainable Places	Support	No comment	Support approach in principle.			Support welcomed. No change required.							
34450	Natural Resources Wales		5	DP SP 1 Creating Sustainable Places	Object	No comment	**SP 1 - Creating Sustainable Places** Should the strategic policy cover adaptation as well as mitigation? In creating sustainable places it may also be appropriate to include or make reference to adaptation to (response to) climate change as well as mitigation (pt 7 refers to reduced contribution to climate change only). Thereby creating sustainable places that are adapted to cope with the impacts of a changing climate as well as cutting emissions to aid efforts to reach decarbonisation and net zero targets. The			Agree focussed change needed.			Point 7 of the policy should be amended to refer to a reduced contribution to climate change through mitigation and incorporation of measures to support climate change adaptation.	Yes			FC4.SP01.01

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							importance of healthy resilient ecosystems (wider than just biodiversity) - soil, habitats, Green Infrastructure, to benefit people and nature e.g. against flooding, impacts of coastal erosion and coastal squeeze and heat extremes. All this contributes to creating sustainable places or environments for people to thrive.										
34450	Natural Resources Wales		6	DP SP 1 Creating Sustainable Places	Support	No comment	**SP 1 - Creating Sustainable Places** It is encouraging to note this strategic policy recognises the importance of biodiversity and resilient ecosystems.			Support welcomed. No change required.							
1533	Home Builders Federation (Mark Harris)		7	DP SP 1 Creating Sustainable Places	Object	No	Linked Key Issues - HBF would suggest that this wording not required in the policy, as it does not require anything to be complied with and does not help explain the policy. HBF notes that the same format is used in all policies within the plan.				The amendment suggested is contrary to National Planning Policy and/or Guidance.		LDP Soundness Test 2 - Is The Plan Appropriate - requires consideration of whether the Plan addresses the key issues. In that context, setting out to which of the key issues each strategic policy is linked seems a sensible inclusion - and acts as a valuable check-list.				

4.0 Policy SP 02 Housing Requirement

Representor Number	Representor	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
4421	Defence Infrastructure Organisation (DIO)	Avison Young (4369)	1	DP SP 2 Housing Requirement	Object	No	Policy SP 2 (Housing Requirement) Policy GN 16 (Residential Allocations) Policy SP 7 (Settlement Boundaries)Not previously submitted as a Candidate Site but would like to add a new site allocation: **Land at Penally Training Camp, Barrack Road, Penally, SA70 7QW**. The detailed submission includes: a constraints plan; a copy of the DVM for alternative sites; Illustrative Master Plans Options 1,2,3.; site location plan; sustainability appraisal; viability assessment and a written representation.	Penally	LDP2/Deposit2/ New Site 13		The housing provision is set out in detail in the Plan to respond to the Plan's housing requirement and it is considered to be sufficient without the need to consider further housing sites.		The level of growth required during the Plan Period and the delivery of housing is set out in detail in the Housing Requirement Background Paper. This is a large site measuring approximately 3.95ha. Development of the site at various densities has been proposed by the representor to accommodate from 118 dwellings to 188 dwellings which is a substantial number of new houses. Penally is classed as a Service Village in the Settlement Hierarchy of the Plan. No residential allocations have been made in the village but this is the same for several other Service Villages throughout the Plan area. PCC has already identified sufficient land at Service Village level across its Plan area and the introduction of this further site would risk over-providing against the plan's strategy in that respect. PCC is also concerned that introducing a completely new site to a rural settlement at this late stage in the process would not be ideal, as there has been no prior community consultation. As such, PCC would suggest that the best way forward is not to allocate this site through LDP 2 or place it in the Penally Settlement Boundary, but rather to await the next Plan review, at which point it could be put forward for consideration through the Candidate Site process and be properly tested throughout the Plan process.	No			
4377	Ateb	Stantec(4376)	3	DP SP 2 Housing Requirement	Support	No comment	A varied housing supply results in a resilient housing supply, and we support that growth has been distributed across the Plan area in accordance with a spatial	Letterston	HSG/053/LDP2/1.	Support welcomed. No change required.				No			

Representor Number	Representor	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
							strategy which promotes sustainable development. More detail is provided in the detailed submission.										
4188	Wales & West Housing	Asbri Planning (4389)	10	DP SP 2 Housing Requirement	Object	No	Whilst the residential allocation HSG/088/LDP2/1 West of Bloomfield Gardens and North of Adams Drive & Highfield Park is supported in principle, we present an objection to Policy SP 2 'Housing Requirement' and the housing requirement of 6,425 dwellings, enabling delivery for 5,840 units (365 per year). As highlighted above, our Client is seeking to improve the deliverability of units during the remaining plan period. As referenced above, this will enable the allocation to be delivered during the plan period and removes the total units to be delivered outside of the plan period. In summary, we believe the housing requirement should reflect our anticipated enhanced delivery of residential units at allocation HSG/088/LDP2/1. A commentary on the tests of soundness is also provided.	Narberth	HSG/088/LDP2/1				The allocation figures set out in Policy GN 16 (Residential Allocations) provide an indication of the number of units anticipated to be delivered during the Plan period, including the percentage of affordable houses. The site allocated in the Plan (HSG/088/LDP2/1) at Bloomfield Gardens includes the area to accommodate the 64 additional houses beyond the Plan period. Due to the delays in preparing the Deposit Plan, all of the short-term and most of the medium term anticipated delivery dates set out in Policy GN 16 have passed. A planning application for 91 dwellings, including 28 affordable houses and 12 low-cost home ownership houses (Ref 23/0654) was granted permission the end of March 2025. A further application for development of the remaining land within the overall allocation could come forward immediately following adoption of LDP2 (Programmed for May 2026 in the Delivery Agreement). Delivery of any houses built within the additional area could be considered as windfall developments. A Focussed Change is being proposed through a separate representation to amend the table heading of Policy GN 16 (Residential Allocations) to 'Expected Units in Plan Period'.	No			
1507	Welsh Government		5	DP SP 2 Housing Requirement	Comment	Yes	**Delivery of Key Sites** The plan needs to demonstrate the key sites can be delivered within the plan period. There are a number of sites which have been 'rolled forward' from LDP1. To add support to the				The amendment suggested is already addressed by the Plan.		The key sites are defined by the Financial Viability Report (July 2024) as being 50 units or more. The site promotors for these allocations have paid for and prepared viability appraisals (where applicable), showing commitment to delivering these sites. Many promotors have also responded to the Deposit Plan consultation in support, with some suggesting that they could bring	No			

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							inclusion of the strategic housing site at Slade Lane South (330 within the plan period and a further 680 beyond the plan period) **the LPA would benefit from providing a Statement of Common Ground demonstrating how Pobl (housing association) and Welsh Government (who have a strong interest/ownership of parts of the site) plus others are on board and the timing of when units can be delivered on the ground.** The Housing Trajectory (Appendix 2, Table B) shows an amended delivery rate over the previous deposit version which appears realistic and achievable. **The Welsh Government is content that previous representations have been addressed and the plan is compliant with the DPM and national planning policy**						the sites forward ahead of the delivery timeframe set out in Appendix 2 Table B. In terms of 'rolling forward' adopted LDP1 sites, this is due to a change in circumstance that have improved the sites' deliverability. In most cases this is due to developer interest in the form of a legal option to purchase the land or they are actively promoting the site on behalf of the landowner. On Slade Lane (S/HSG/40/LDP2/6), it is considered that the delivery of the site has progressed beyond the stage of a Statement of Common Ground for the following reasons. The first phase of 115 units is being constructed by Lovell Homes Ltd on behalf of Pobl, who are actively marketing the shared ownership and open market units at the time of writing, with some being sold subject to contract. Pobl have also recently submitted a planning application for phase 2 (reference 24/0497/PA), demonstrating a delivery pipeline for the site in the medium term. Finally, Welsh Government have appointed Lichfields consultancy to lead on masterplanning the subsequent phases of the site. There have been regular meetings and emails between WG/Lichfields and representatives at Pembrokeshire County Council in the planning, property, education and conservation departments. This shows a commitment to delivering phase 3 in the medium to long term phases of the Plan.				
1533	Home Builders Federation (Mark Harris)		5	DP SP 2 Housing Requirement	Object	No	The HBF considers that the plan lacks aspiration with an annual delivery rate below that of both the 5 year and 10 year average past completion rates. The resultant annual				The amendment suggested is not supported by the Plan's evidence base.		LDP1 adopted 28th February 2013 has undelivered on its housing target. That target was based on Welsh Government household projections, which have since been found to be significantly over-inflated. As the Housing Delivery Assessments and	No.			

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							requirement figure will both limit the delivery of affordable homes but also constrain economic development.						its predecessor the Joint Housing Land Supply (JHLAS) studies have shown, this overprovision including a larger flexibility allowance did not result in higher levels of housing completions. The Council's Background Paper on Housing Requirement 2023 sets out the journey the Plan's Housing Requirement has made from the original Preferred Strategy, Deposit Plan 1 and the associated objection from Welsh Government in 2020, which flagged dangers of overprovision. The trend data for the 5 year and 10 year average covers the period up until 2018/19. In some of the subsequent years that count towards LDP2's housing provision, there has been a reduction in the number of completions. This has resulted in an under-delivery of 173 units since the plan's base date of 2017. This means that the average annual completions for the remaining plan years will need to be 382 units per year, which is above the historical 5 year and 10 year averages.				

4.0 Policy SP 03 Affordable Housing Target

Representor Number	Representor	Agent	Representation :	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
4188	Wales & West Housing	Asbri Planning (4389)	4	DP SP 3 Affordable Housing Target	Object	No	Whilst the residential allocation under Policy GN 19A Maesgwynne, Fishguard S/HSG/034F/LDP2/1 is supported in principle, we present an objection to Policy SP 3 'Affordable Housing Target'. As highlighted above, it is anticipated housing delivery at Maesgwynne will be significantly improved upon, providing 40 residential units per year, in comparison to the original delivery of circa 22 residential units per year. Consequently, the quantum of affordable housing could rise as the allocation is brought forward for development at a quicker rate. On this basis, we believe the target for affordable housing could rise in accordance with the anticipated yearly build out rates envisaged at Maesgwynne. A commentary on the tests of soundness is also provided.	Fishguard	S/HSG/034F/LDP2/1		The amendment suggested is not supported by the Plan's evidence base.		Policy SP 3 (Affordable Housing Target) is a strategic policy that sets out the overall Plan area target for provision of new affordable dwellings over the Plan period. It is expressed as a minimum in which context, if implementation results in a higher figure being achieved than the 2000 quoted, that would still accord with the policy. Matters relating to the affordable housing target specifically for the Fishguard, Maesgwynne site are addressed under separate representations.	No			
34485	Pembrokeshire Coast National Park Authority		4	DP SP 3 Affordable Housing Target	Support	No comment	SP 3 Affordable Housing Target: Both Plans place a strong emphasis on delivering affordable housing to meet local needs. There is a shared approach to identifying the scale of need using the Local Housing Market Assessment. The replacement Local Housing Market Assessment for Pembrokeshire (2023) remains in draft and is awaiting approval from Welsh Government. Both plans aim to address newly arising need and seek to contribute to meet the existing need. The authorities liaise directly regarding			Support welcomed. No change required.				No			

Representor Number	Representor	Agent	Representation :	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
							affordable housing delivery. Support Policy SP 3 Affordable Housing Target in term of the conformity of approach and continuing to liaise on affordable housing policy and guidance development.										
1507	Welsh Government		7	DP SP 3 Affordable Housing Target	Comment	No comment	**Affordable Housing** The DPM identifies the LHMA as a core piece of evidence that sets out the level and type of housing need in an area. The LHMA was published July 2021 and identifies a need for 2,832 affordable homes (177 units per annum) over the plan period. The plan is seeking to deliver 2,000 affordable homes over the plan period (policy SP3, at 125/yr). It is unclear if the 80% social rent and 20% intermediate housing tested in the viability assessment (presumably reflecting the previous Area Summary Paper) is the correct tenure split and should be clarified. This could impact on findings in the viability assessment including the plan-wide and sitespecific affordable housing targets in Policies GN16 & 20. **Further clarity on this aspect would be beneficial. The Welsh Government is content that previous representations have been addressed and the plan is compliant with the DPM and national planning policy, albeit with clarity on the tenure split and avoiding issues regarding viability assessments.**			Agree focussed change needed.			The Financial Viability Report 2024 advises at paragraph 5.13: Based on the most recent LHMA, it has been assumed that 75% of affordable homes provided on market-led developments, via s.106 obligations, will be for social rented tenure; and that the remaining 25% will be intermediate tenure. This was therefore based on what was the latest version of the draft LHMA 2023 advised at that time. Paragraph 5.108 of the Local Development Plans Manual includes a checklist that asks for a table setting out the components of supply that underpin the affordable housing provision figure for the Plan. It also asks that the reasoned justification should set out the tenure split. The level of need in the current LHMA also needs to be included in the reasoned justification. A focussed change is proposed to address these matters. The tenure split is likely to change from LHMA to LHMA.	Yes			FC4.SP03.01

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1533	Home Builders Federation (Mark Harris)		9	DP SP 3 Affordable Housing Target	Object	No	The HBF suggests that the policy requires rewording as the figure can't be described as a target and a minimum as well.			Agree minor change needed.				Yes	ME8		

4.0 Policy SP 06 – Settlement Hierarchy

Representor Number	Representor	Agent	Representation	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
4322	Mrs A Phillips		1	DP SP 6 – Settlement Hierarchy – A Sustainable Settlement Strategy	Object	No	We support **Policy SP6** that identifies the sustainable village of Square and Compass as a Service Village. We support **Policy SP9** and its intentions to support and encourage sustainable communities, sustaining a thriving rural economy, and supporting place-making and well-being, however we feel the interpretation of this policy on the ground does not go far enough. Pembrokeshire is a rural county, full of strong Welsh communities, however they must be allowed to grow and flourish. Policy SP9 clearly states development should be of a scale and nature identified as being appropriate for the settlement. In the case of Square and Compass this is identified as Service Village under SP6 however despite its sustainable location, with designated pavement and footpath links to the satellites of the main village centre that includes a shop, garage, regular bus service and public house, its settlement boundary does not include any proposed allocations. Unfortunately we were not aware of the LDP prior to this consultation otherwise we would have raised our concerns earlier and suggested the inclusion of our land. We own land adjoining the Penparc area of Square and Compass and **we respectfully request that you include additional land within the settlement boundary** to allow this sustainable Welsh community to grow – please see annotated maps attached. Para 4.44 rightly acknowledges "Settlements in the rural area are classified according to a settlement hierarchy, based on evidence of facilities and services available within those settlements and their potential to	Square & Compass	LDP2/Deposit2/New Site 5		The amendment suggested is not supported by the Plan's evidence base.		Square and Compass is classified as a Service Village by LDP 2, Deposit Plan 2's Settlement Hierarchy. Many Service Villages are given a LDP 2, Deposit Plan 2 residential allocation. However, in this case, there were no Candidate Sites submitted for the settlement and hence it did not get a residential allocation under policy GN 16. During the Deposit Plan 2 consultation, a representation was received proposing an Alternative Site for residential use, adjoining the Square and Compass Settlement Boundary. This is a section of an agricultural field adjoining the Settlement Boundary, with one further side defined by a road, but the remaining two being undefined within the field. This submission has come late in the LDP 2 plan preparation process, the site has therefore not been constraints checked through the Candidate Site assessment process and it has not been accompanied by a Sustainability Appraisal. Part of the broader context for	No			

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							accommodate further development. Those with a good range of services are considered more sustainable locations for development and are classified accordingly within the current Settlement Hierarchy" however Square and Compass has not been afforded any growth despite clear evidence of strong facilities and services. Future Wales clearly identifies the importance of supporting rural areas, securing economic and housing growth which in turn supports and retains those of working age, and we strongly urge you to support housing growth in Square and Compass. Para 4.46 of the LDP recognises that providing growth in sustainable rural communities may assist in providing sufficient demand to support the retention of facilities within rural settlements. Directing housing towards settlements with strong service provision. As acknowledged in Para 4.51 villages such as Square and Compass offer a good provision of services and facilities to meet the day to day needs of their population. It is not sustainable for this community to stand still, and without any additional land within the boundary this village will stagnate. There has been poor spatial distribution of housing completions in the north of the county in recent years and I feel that our site would help alleviate this disproportionate growth and help to sustain the north of the county. It is vitally important that Welsh communities such as ours can grow, for the sake of our language, our children, our working population and the future of the services and facilities that already operate in our community. **New Site allocation proposed - 2 Maps provided with original representation.**						considering future planning in this particular settlement is also that it is a split settlement, with part located within and part outside the Pembrokeshire Coast National Park. The National Park element of the settlement has two rounding off opportunities within a settlement boundary that are expected to provide 7 and 10 dwellings respectively, although noting that there has been no progress towards delivery to date on either. Looking at broader issues, PCC has already identified sufficient land at Service Village level across its Plan area and the introduction of this further site would risk over-providing against the plan's strategy in that respect. PCC is also concerned that introducing a completely new site to a rural settlement at this late stage in the process would not be ideal, as there has been no prior community consultation. As such, PCC would suggest that the best way forward is not to allocate this site through LDP 2 or place it in the Square and Compass Settlement Boundary, but rather to await the next Plan review, at which point it could be put forward for consideration through the				

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													Candidate Site process and be properly tested throughout the Plan process.				
4380	Cllr A Cormack		2	DP SP 6 – Settlement Hierarchy – A Sustainable Settlement Strategy	Comment	No comment	2. Summerhill It should be noted that the points awarded for a public house/club in Summerhill relate to Meadow House Caravan park which is located outside the village boundary. This also should be a local village rather than a service village.	Summerhill			The amendment suggested is not supported by the Plan's evidence base.		The public bar/club at Meadow House is open to non-residents. Its location outside the settlement boundary for Summerhill does not affect its status as a facility for the local community. The Rural Facilities Report (2020) shows that Summerhill has a weighted score of 12 for facilities and services which is just over the threshold of 11 for Service Villages, set out in the same Report.	No			
4380	Cllr A Cormack		3	DP SP 6 – Settlement Hierarchy – A Sustainable Settlement Strategy	Comment	No comment	3. New Inn I question why New Inn has been included as a settlement separate to Amroth. The postal addresses of the properties in the New Inn area are all Amroth and residents see it as part of Amroth village. The Amroth village sign on approaching the village from the East is located before the New Inn. I maintain that New Inn is not separate but very much part of Amroth. Also the Amroth settlement boundary line appears to dissect a property located near the New Inn, Amroth. The house is within the boundary but the adjacent garage is outside. From a planning perspective this could complicate future planning applications. I request that the whole property is included within the settlement boundary.	New Inn		Comment noted. No change required.			The settlement of Amroth is mostly within Pembrokeshire Coast National Park and under the planning jurisdiction of the National Park Authority. Where settlements are split by the National Park boundary it is sometimes possible to join the settlement boundaries within each planning area. In this instance the Centre Boundary for Amroth is defined in the National Park LDP2 and does not extend to the National Park boundary. Settlement boundaries are a planning tool used to define settlement areas, within which the principle of new development is generally	No			

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													acceptable, whereas outside the boundaries there are likely to be more constraints to development. They frequently do not encapsulate all of the areas commonly regarded by local residents to be part of a town or village. The garage outside of the settlement boundary shown for New Inn is detached and separated from the properties it serves by the minor road running between Amroth and Marros. The exclusion of the garage also reflects its location at the head of Amroth Beach and its location in a Zone 3 Flood Risk tidal flood risk area.				
4393	Welsh Government Place Division, Housing and Regeneration Directorate	Lichfields (4394)	3	DP SP 6 – Settlement Hierarchy – A Sustainable Settlement Strategy	Support	Yes	Detailed submission of support provided.			Support welcomed. No change required.				No			
4377	Ateb	Stantec(4376)	4	DP SP 6 – Settlement Hierarchy – A Sustainable Settlement Strategy	Support	No comment	Policy SP6 Settlement Hierarchy continues to designate Letterston as a service centre. We support Letterston's identification as a Service Centre within the settlement hierarchy. Land 'Between Longstone Court & 62 Station Road' occupies a sustainable location being within walking distance of a wide range of facilities. More detail is provided in the detailed submission.	Letterston	HSG/053/LDP2/1.	Support welcomed. No change required.				No			

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34751	Amroth Community Council		4	DP SP 6 – Settlement Hierarchy – A Sustainable Settlement Strategy	Comment	No comment	3. New Inn Amroth Community Council question why New Inn has been included as a settlement separate to Amroth. The postal addresses of the properties in the New Inn area are all Amroth and residents see is as part of Amroth village. The Amroth village sign on approaching the village from the East is located before the New Inn. Amroth Community Council maintain that New Inn is not separate but very much part of Amroth. Also the Amroth settlement boundary line appears to dissect a property located in New Inn, Amroth. The house is within the boundary but the adjacent garage is outside. From a planning perspective this could complicate future planning applications. Amroth Community Council request that the whole property is included within the settlement boundary.	New Inn			The amendment suggested is not supported by the Plan's evidence base.		The settlement of Amroth is mostly within Pembrokeshire Coast National Park and under the planning jurisdiction of the National Park Authority. Where settlements are split by the National Park boundary it is sometimes possible to join the settlement boundaries within each planning area. In this instance the Centre Boundary for Amroth is defined in the National Park LDP2 and does not extend to the National Park boundary. Settlement boundaries are a planning tool used to define settlement areas, within which the principle of new development is generally acceptable, whereas outside the boundaries there are likely to be more constraints to development. They frequently do not encapsulate all of the areas commonly regarded as being part of a community or village. The garage outside of the settlement boundary shown for New Inn is detached and separated from the properties it serves by the minor road running between Amroth and Marros. The exclusion of the garage reflects its location at the head of Amroth Beach which is within a Zone 3 Flood Risk tidal flood risk area.	No			

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4409	Pembrokeshire Living Ltd	Lichfields (4409)	4	DP SP 6 – Settlement Hierarchy – A Sustainable Settlement Strategy	Support	Yes	Draft policy SP 6 identifies Begelly as a Service Village of the Rural Settlements within the hierarchy. Kilgetty by comparison is identified as a Service Centre. The classifications for these two settlements appear appropriate, reflecting their functional characteristics and the respective availability of services and facilities. The identification of Begelly as a Service Village recognises the relative locational sustainability of the settlement, and in this regard, emerging Policy SP 6 is endorsed. The proximity of Begelly to Kilgetty should be noted. The two settlements are connected by footpaths and appropriate dropped kerb road crossings. This means that residents of Begelly can access a wider range of facilities and services in Kilgetty by foot, enhancing the locational sustainability of both settlements.			Comment noted. No change required.				No			
34485	Pembrokeshire Coast National Park Authority		5	DP SP 6 – Settlement Hierarchy – A Sustainable Settlement Strategy	Support	No comment	SP 6 – Settlement Hierarchy: Both PCC's Re-Deposit Plan and PCNPA's adopted LDP have devised a settlement hierarchy and direct development to the highest tiers of the hierarchy in line with sustainability objectives. PCC 's hierarchy identifies the four Regional Growth Areas as identified in Future Wales in Tier 1 along with other urban areas. The PCNPA's LDP was prepared prior to the publication of Future Wales and took account of the vision and objectives of the Wales Spatial Plan 2008 Update. It is noted that the Re-Deposit Plan has promoted Narberth from a Rural Town in the Preferred Strategy to an Urban Settlement. This change places Narberth in the same tier of the hierarchy as the Regional Growth Areas as identified in Future Wales. The majority of residential development in PCC's area will be directed to the Urban Settlements, Service Centres and Service Villages. Land is allocated for development			Support welcomed. No change required.				No			

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							for employment and other land uses in most Urban Settlements to support their continued role as centres of economic, social and cultural activity. The table included with the submission (not reproduced here) shows the compatibility of approach at higher and lower tiers in both Plans. In terms of additional comment: Service Centre/Local Centre: Crymych is identified as a service centre (Tier 2a) in PCC's Re-Deposit Plan and as a local centre (Tier 2) in PCNPA's LDP 2. Service Centres/Rural Centres: Some Rural Centres (Tier 3) in the Pembrokeshire Coast National Park are listed as Service Centres (Tier 2a) in the Council's Plan: Lamphey and Llangwm. These Centres lie almost wholly outside the National Park and the role of the Pembrokeshire Coast National Park Local Development Plan has been to 'compliment' the Council's defined approach at these Centres. Service Villages/Rural Centres: Some Rural Centres (Tier 3) in the Pembrokeshire Coast National Park are listed as Service Villages (Tier 2b) in the Council's Plan: Carew, Cosheston, Hook, Houghton, New Hedges, Roch, Square & Compass. Local Villages/Rural Centres: Pleasant Valley and Wiseman's Bridge are identified as cluster local villages in PCC's plan (Tier 2c) and are listed as Rural Centres (Tier 3) in the Pembrokeshire Coast National Park Local Development Plan. The cluster local villages do not have allocations. Support SP 6 – Settlement Hierarchy: - there is conformity of approach in relation to the two Plan's spatial strategies and the approach to cross-boundary settlements.									

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34485	Pembrokeshire Coast National Park Authority		7	DP SP 6 – Settlement Hierarchy – A Sustainable Settlement Strategy	Support	No comment	Employment The Spatial Strategy commentary above sets out where there is consistency of approach on where employment undertakings can take place in the County. The County Council and the National Park Authority are stakeholders in a Regional Strategic Economic study along with Carmarthenshire County Council and Brecon Beacons National Park Authority. The final report was published in October 2019. The study broadly concludes that there is sufficient strategic land available to meet demand across the area. Overall, the approach taken by Pembrokeshire County Council is considered to be compatible with the Pembrokeshire Coast National Park spatial strategy. Support the conformity of approach in SP 6 – Settlement Hierarchy.			Support welcomed. No change required.				No			
1533	Home Builders Federation (Mark Harris)		10	DP SP 6 – Settlement Hierarchy – A Sustainable Settlement Strategy	Object	No	The HBF notes that the work to support this, 'Urban Facilities Study and Rural Facilities Study' was carried out in 2019 so is already 5 years out of date and does not take account of the impact of Covid.				The most up to date information available at the time of the base date of the Deposit Plan preparation has been used in Plan preparation.		Both Papers are anchored at the base date of the Local Development Plan 2 but have been updated in 2024 which is post- Covid. The Urban Settlements Report details the services and facilities available at the larger settlements in Pembrokeshire. The content shows in detail how settlements are chosen and the attributes recognised remain mostly intact. The areas that have struggled most are bus travel and retail in some locations but this is not considered a trigger to move urban settlements in the hierarchy. Specific issues such as retail decline has been addressed by specific policy changes in the Plan.	No			

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													In terms of the Rural Facilities Report settlements selected at the lower end of the hierarchy would have the most impactful change in terms of their status if facilities are lost. This would need to be addressed at next review stage otherwise the Plan will be continually in review. Where representations on the Deposit Plan have been received in relation to lack of facilities available at individual settlements these are being dealt with.				

4.0 Policy SP 07 Settlement Boundaries

Representor Number	Representor	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
1470	Mathry Community Council		1	DP SP 7 Settlement Boundaries	Comment	No comment	Mathry Community Council met to discuss the consultation on the review of the Local Development Plan 2 on the 18 November 2024. There were two comments we wish to record: 1. The Community Council has no adverse comments with regard to the change in the village boundary to include the 2 new areas.	Mathry		Comment noted. No change required.				No			
1533	Home Builders Federation (Mark Harris)		11	DP SP 7 Settlement Boundaries	Object	No	HBF questions how does this approach affect windfalls moving forward, will it limit the future level of windfall compared to previous levels due to the new tighter boundaries?				The amendment suggested is contrary to National Planning Policy and/or Guidance.		The approach taken to estimating likely windfall contributions is set out in the Housing Supply and Trajectory July Background Paper 2024. Windfalls can only be estimated. Requirements of national planning policy will mean that more speculative infill and rounding off for market housing in countryside locations through criteria-based policies has moved to a more planned approach, where growth is defined by settlement boundaries. A more planned approach sees the majority of development focussed in the larger settlements and more	No			

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													likely to be based on housing allocations. Bearing in mind that the planned level of growth from LDP1 and LDP2 Deposit 1 is reduced the estimated annual windfall is also reduced. In addition, the calculation of windfall is a much more refined process under Development Plans Manual 3 which seeks to remove outliers from calculations. As a result and by way of comparison, LDP 2 Deposit 1 shows a figure of 102 per annum and 98 per annum for large and small windfalls respectively. LDP 2 Deposit 2 shows figures of 40 and 66 per annum for large and small windfalls respectively. It is useful to note that many settlement boundaries have included opportunities to extend development during the Plan period.				
1561	St Dogmaels Community Council		2	DP SP 7 Settlement Boundaries	Support	No comment	**Site 480** Talar Aur Croft Housing St Dogmaels Community Council supports the 'red' recommendation for this site. **St Dogmaels (Croft)**	St Dogmaels	Candidate Site 480	Support welcomed. No change required.				No			

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1561	St Dogmaels Community Council		3	DP SP 7 Settlement Boundaries	Support	No comment	**Site 521 Opposite Dwylan, Boat Park** St Dogmaels Community Council recognises this as a sensitive site, outside the current boundary. Any development there could impact the adjacent SSSI and River Teifi SAC. It would also visually impact the approach to the village as a key site beside the B4546. The Community Council notes that no use has currently been suggested and requests that any future development which might be proposed on this site be sympathetic to the locations and to the fact that it is outside the boundary	St Dogmaels	Candidate Site 521	Support welcomed. No change required.				No			
1561	St Dogmaels Community Council		4	DP SP 7 Settlement Boundaries	Object	No comment	The Community Council strongly objects to candidate site proposals: **129 Adjacent to Dovepoint Fach 173 North of Bryncoed 205 Land at Cefn Farm, Longdown Bank 264 East of Y Glandy, Mwtshwr Lane 265 East of Y Glandy, Mwtshwr Lane** The above sites all have very poor access across largely single track road / track. The highways in the adjacent built up areas of the village could not support the additional traffic which would be generated if the sites were to be developed. There is little or no opportunity for developers to address the problems given the topography and current housing on the approaches. In addition footpath 87/25c runs along the current access to sites 264 and 265 and the Council would	St Dogmaels	Candidate Site 129		The amendment suggested is not supported by the Plan's evidence base.		All of the Candidate Sites were assessed. Candidate Sites 173 North of Bryncoed 205 Land at Cefn Farm, Longdown Bank 264 East of Y Glandy, Mwtshwr Lane 265 East of Y Glandy, Mwtshwr Lane were not considered suitable for allocation for residential use in the Plan. Candidate Site 129 Adjacent to Dovecote Fach was found appropriate for residential use. The Highway Authority were consulted and raised no objections to the site being included within the Settlement Boundary for St Dogmaels.	No			

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							require that the footpath be kept open and safe for use at all times should any development take place. FURTHER: The Council has submitted a number of files (including photographic showing flooding, water runoff and the impact of such events that St Dogmaels Community Councils asks are examined as evidence that sites 129 Adjacent to Dovepoint Fach 173 North of Bryncoed 205 Land at Cefn Farm, Longdown Bank 264 East of Y Glandy, Mwtshwr Lane 265 East of Y Glandy, Mwtshwr Lane Are and will remain unsuitable for development. St Dogmaels Community Council also refers to Annex A and Annex B in support of its objections. Should there be any opportunity for verbal evidence to be given as to any of the above, at any time in the LDP2 process the Community Council would be happy to arrange for this to be provided. The Council is also happy to provide accompanied site visits should the opportunity arise. **Additional information and photos provided with the original representation detailing surfance and groundwater issues and geological and hydrological concerns for Candidate Sites.** Given the weight of local knowledge and evidence St Dogmaels Community Council does not support the inclusion of candidate									

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							sites 205, 264 and 265 in the LDPII										
1561	St Dogmaels Community Council		5	DP SP 7 Settlement Boundaries	Support	No comment	The Community Council strongly objects to candidate site proposals: **129 Adjacent to Dovepoint Fach 173 North of Bryncoed 205 Land at Cefn Farm, Longdown Bank 264 East of Y Glandy, Mwtshwr Lane 265 East of Y Glandy, Mwtshwr Lane** The above sites all have very poor access across largely single track road / track. The highways in the adjacent built up areas of the village could not support the additional traffic which would be generated if the sites were to be developed. There is little or no opportunity for developers to address the problems given the topography and current housing on the approaches. In addition footpath 87/25c runs along the current access to sites 264 and 265 and the Council would require that the footpath be kept open and safe for use at all times should any development take place. FURTHER: The Council has submitted a number of files (including photographic showing flooding, water runoff and the impact of such events that St Dogmaels Community Councils asks are examined as evidence that sites 129 Adjacent to Dovepoint Fach 173 North of	St Dogmaels	Candidate Site 173	Support welcomed. No change required.			All of the Candidate Sites were assessed. Candidate Sites 173 North of Bryncoed 205 Land at Cefn Farm, Longdown Bank 264 East of Y Glandy, Mwtshwr Lane 265 East of Y Glandy, Mwtshwr Lane were not considered suitable for allocation for residential use in the Plan. Candidate Site 129 Adjacent to Dovecote Fach was found appropriate for residential use. The Highway Authority were consulted and raised no objections to the site being included within the Settlement Boundary for St Dogmaels.	No			

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							Bryncoed 205 Land at Cefn Farm, Longdown Bank 264 East of Y Glandy, Mwtshwr Lane 265 East of Y Glandy, Mwtshwr Lane Are and will remain unsuitable for development. St Dogmaels Community Council also refers to Annex A and Annex B in support of its objections. Should there be any opportunity for verbal evidence to be given as to any of the above, at any time in the LDP2 process the Community Council would be happy to arrange for this to be provided. The Council is also happy to provide accompanied site visits should the opportunity arise. **Additional information and photos provided with the original representation detailing surfance and groundwater issues and geological and hydrological concerns for Candidate Sites.** Given the weight of local knowledge and evidence St Dogmaels Community Council does not support the inclusion of candidate sites 205, 264 and 265 in the LDPII									

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1561	St Dogmaels Community Council		6	DP SP 7 Settlement Boundaries	Support	No comment	The Community Council strongly objects to candidate site proposals: **129 Adjacent to Dovepoint Fach 173 North of Bryncoed 205 Land at Cefn Farm, Longdown Bank 264 East of Y Glandy, Mwtshwr Lane 265 East of Y Glandy, Mwtshwr Lane** The above sites all have very poor access across largely single track road / track. The highways in the adjacent built up areas of the village could not support the additional traffic which would be generated if the sites were to be developed. There is little or no opportunity for developers to address the problems given the topography and current housing on the approaches. In addition footpath 87/25c runs along the current access to sites 264 and 265 and the Council would require that the footpath be kept open and safe for use at all times should any development take place. FURTHER: The Council has submitted a number of files (including photographic showing flooding, water runoff and the impact of such events that St Dogmaels Community Councils asks are examined as evidence that sites 129 Adjacent to Dovepoint Fach 173 North of Bryncoed 205 Land at Cefn Farm, Longdown Bank 264 East of Y Glandy, Mwtshwr Lane 265 East of Y Glandy, Mwtshwr Lane Are and will remain unsuitable for	St Dogmaels	Candidate Site 205	Support welcomed. No change required.			All of the Candidate Sites were assessed. Candidate Sites 173 North of Bryncoed 205 Land at Cefn Farm, Longdown Bank 264 East of Y Glandy, Mwtshwr Lane 265 East of Y Glandy, Mwtshwr Lane were not considered suitable for allocation for residential use in the Plan. Candidate Site 129 Adjacent to Dovecote Fach was found appropriate for residential use. The Highway Authority were consulted and raised no objections to the site being included within the Settlement Boundary for St Dogmaels.	No			

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							development. St Dogmaels Community Council also refers to Annex A and Annex B in support of its objections. Should there be any opportunity for verbal evidence to be given as to any of the above, at any time in the LDP2 process the Community Council would be happy to arrange for this to be provided. The Council is also happy to provide accompanied site visits should the opportunity arise. **Additional information and photos provided with the original representation detailing surfance and groundwater issues and geological and hydrological concerns for Candidate Sites.** Given the weight of local knowledge and evidence St Dogmaels Community Council does not support the inclusion of candidate sites 205, 264 and 265 in the LDPII									
1561	St Dogmaels Community Council		7	DP SP 7 Settlement Boundaries	Support	No comment	The Community Council strongly objects to candidate site proposals: **129 Adjacent to Dovepoint Fach 173 North of Bryncoed 205 Land at Cefn Farm, Longdown Bank 264 East of Y Glandy, Mwtshwr Lane 265 East of Y Glandy, Mwtshwr Lane** The above sites all have very poor access across largely single track road / track. The highways in the adjacent built up areas of the village could not support the additional traffic which would be generated if the sites were to be	St Dogmaels	Candidate Site 264	Support welcomed. No change required.			All of the Candidate Sites were assessed. Candidate Sites 173 North of Bryncoed 205 Land at Cefn Farm, Longdown Bank 264 East of Y Glandy, Mwtshwr Lane 265 East of Y Glandy, Mwtshwr Lane were not considered suitable for allocation for residential use in the Plan. Candidate Site 129 Adjacent to Dovecote Fach was found appropriate for residential use. The Highway Authority were consulted and raised no objections to the site being	No			

Representor Number	Representor	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
							developed. There is little or no opportunity for developers to address the problems given the topography and current housing on the approaches. In addition footpath 87/25c runs along the current access to sites 264 and 265 and the Council would require that the footpath be kept open and safe for use at all times should any development take place. FURTHER: The Council has submitted a number of files (including photographic showing flooding, water runoff and the impact of such events that St Dogmaels Community Councils asks are examined as evidence that sites 129 Adjacent to Dovepoint Fach 173 North of Bryncoed 205 Land at Cefn Farm, Longdown Bank 264 East of Y Glandy, Mwtshwr Lane 265 East of Y Glandy, Mwtshwr Lane Are and will remain unsuitable for development. St Dogmaels Community Council also refers to Annex A and Annex B in support of its objections. Should there be any opportunity for verbal evidence to be given as to any of the above, at any time in the LDP2 process the Community Council would be happy to arrange for this to be provided. The Council is also happy to provide accompanied site visits should the opportunity arise. **Additional information and photos provided with the original representation detailing**						included within the Settlement Boundary for St Dogmaels.				

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							surface and groundwater issues and geological and hydrological concerns for Candidate Sites. Given the weight of local knowledge and evidence St Dogmaels Community Council does not support the inclusion of candidate sites 205, 264 and 265 in the LDPII										
1561	St Dogmaels Community Council		8	DP SP 7 Settlement Boundaries	Support	No comment	The Community Council strongly objects to candidate site proposals: **129 Adjacent to Dovepoint Fach 173 North of Bryncoed 205 Land at Cefn Farm, Longdown Bank 264 East of Y Glandy, Mwtshwr Lane 265 East of Y Glandy, Mwtshwr Lane** The above sites all have very poor access across largely single track road / track. The highways in the adjacent built up areas of the village could not support the additional traffic which would be generated if the sites were to be developed. There is little or no opportunity for developers to address the problems given the topography and current housing on the approaches. In addition footpath 87/25c runs along the current access to sites 264 and 265 and the Council would require that the footpath be kept open and safe for use at all times should any development take place. FURTHER: The Council has submitted a number of files (including photographic showing	St Dogmaels	Candidate Site 265	Support welcomed. No change required.			All of the Candidate Sites were assessed. Candidate Sites 173 North of Bryncoed 205 Land at Cefn Farm, Longdown Bank 264 East of Y Glandy, Mwtshwr Lane 265 East of Y Glandy, Mwtshwr Lane were not considered suitable for allocation for residential use in the Plan. Candidate Site 129 Adjacent to Dovecote Fach was found appropriate for residential use. The Highway Authority were consulted and raised no objections to the site being included within the Settlement Boundary for St Dogmaels.	No			

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							flooding, water runoff and the impact of such events that St Dogmaels Community Councils asks are examined as evidence that sites 129 Adjacent to Dovepoint Fach 173 North of Bryncoed 205 Land at Cefn Farm, Longdown Bank 264 East of Y Glandy, Mwtshwr Lane 265 East of Y Glandy, Mwtshwr Lane Are and will remain unsuitable for development. St Dogmaels Community Council also refers to Annex A and Annex B in support of its objections. Should there be any opportunity for verbal evidence to be given as to any of the above, at any time in the LDP2 process the Community Council would be happy to arrange for this to be provided. The Council is also happy to provide accompanied site visits should the opportunity arise. **Additional information and photos provided with the original representation detailing surfance and groundwater issues and geological and hydrological concerns for Candidate Sites.** Given the weight of local knowledge and evidence St Dogmaels Community Council does not support the inclusion of candidate sites 205, 264 and 265 in the LDPII									

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1745	Cilgerran Community Council		6	DP SP 7 Settlement Boundaries	Support	No comment	**Pen Y Bryn:** Cilgerran Community Council concur with the above plan as presented, with both sites 259 and 260 appropriate for the future development needs of the village. We would expect the infill site to the west of site 260 to be considered acceptable for development as part of the infill and rounding off policy. **See original representation for map included.**	Pen-y-Bryn	Candiate Sites 259 and 260	Support welcomed. No change required.				No			
1745	Cilgerran Community Council		7	DP SP 7 Settlement Boundaries	Support	No comment	**Rhoshill - Site 503** - Cilgerran Community Council does not believe that this site possesses any merit for development and would be a gross breach of development in open countryside. Members further note that the development line should be maintained as it currently sits, which allows for limited opportunities of development by virtue of the infill and rounding off policy. **See original representation for map included.**	Rhoshill	Candidate Site 503	Support welcomed. No change required.				No			
2036	Llandewi Velfrey Community Council		1	DP SP 7 Settlement Boundaries	Support	No comment	Candidate sites 092, 378, 380, 496 Llanddewi Velfrey Candidate site 348 Llanddewi Velfrey These sites were discussed in the most recent meeting of this Council. Candidate sites 092, 378 and 496 are stated as not well related to the existing settlement. They are all therefore designated red category 4 sites by the process undertaken so far.	Llanddewi Velfrey	Candidate sites 092, 378, 380, 496	Support welcomed. No change required.				No			

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							Candidate site 380 has had trees planted on it now and so is no longer suitable. Candidate site 348 relates to the bypass which is under construction currently, with a winter/spring 2024-2025 completion date. Therefore **the Council objects to all of these of these being included within the LD**P for potential development locations , but assumes that the decision has already been taken on them.										
2036	Llandewi Velfrey Community Council		2	DP SP 7 Settlement Boundaries	Support	No comment	**Candidate site 379 Llanddewi Velfrey** This site was discussed in the most recent meeting of this Council. **They have asked me to pass on the following objections to it:** 1. The land is a greenfield site on sloping high ground and part of the countryside visible from up to 15km away, especially from the north and west. Building on any part of this site would have a negative impact upon the visual environment for a large area and also damage the rich and well developed wildlife system that it contains and that it supports within the wider village area. 2. The LDP should consider whether any new sites would impact upon the existing area and the inhabitants. Development on this site would significantly reduce the visual amenity and environment for local residents	Llanddewi Velfrey	Candidate Site 379	Support welcomed. No change required.				No			

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							and have a negative effect on their well-being. It would also very likely have a financial impact upon the value of properties elsewhere in the village, particularly adjacent to any new development here. 3. The size of the area would be enough for potentially more than 100 new houses. This would almost double the number of houses in the immediate village area, which would be not a proportionate development for the area. 4. There are concerns that the infrastructure for a development on this site is not adequate – are the water and sewerage services adequate for a significant increase and demand? Has the consequence of building on land which currently absorbs rainfall and replacing it with nonabsorbent tarmac etc. been considered? There is the potential for flooding, or knock on water including foul water incidents in the village should this area be developed. 5. Access to this land would be on narrow unclassified roads which are wholly unsuitable for any increase in traffic. There are complaints now about the traffic levels – development would only exacerbate the issues. 6. The LDP should consider issues of sustainability and the environment when considering									

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							locations for development. Apart from a small village shop in the village, which might close when the bypass opens, there are no amenities currently in the village. Therefore any new residents would need to travel out for work, healthcare , school or shopping, and poor public transport means this would in the vast majority of cases be by car. Development on this site would mean increased vehicle emissions. 7. This site was put forward for LDP1 and turned down then. Nothing has changed in the intervening years to support its inclusion in LDP2.										
2082	Mrs J James	W D Thomas (34589)	1	DP SP 7 Settlement Boundaries	Object	No	**Candidate site 084 -** 1.31 hectares portion of the site. Housing Site at Bracknell Lodge Freystrop. Statement in respect of Candidate Site 084 South of Bracknell Lodge Freystrop. **Background:** Under LDP2 Deposit 1 the larger part of candidate site 084 was "screened out" for the following reasons "unsuccessful-part retained within settlement boundary with remainder excluded as the site is on the periphery of the village and other better located sites achieve the level of development suitable for the settlement" However all of site 084had previously been within the settlement boundary	Freystrop	Candidate Site Reference 084		The amendment suggested is not supported by the Plan's evidence base.		As stated by the Candidate Site Register entry for CS.84, other sites within the village achieve the level of development suitable for the settlement. It is therefore not appropriate to further extend the settlement boundary to include all of CS.84	No			

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							pre1994 and had been granted outline planning permission for housing in 1989. Unfortunately as no development commenced in the subsequent 3 years -due to the owner living abroad that planning permission lapsed. Despite assurances by planners in Preseli Pembrokeshire District Council that a new planning application would be favourably considered the Dyfed Structure Plan required PPDC to prepare a new revised local plan for Freystrop and this larger part of 084 was left outside the development boundary of the settlement. **Current state of affairs:** LDP2 Deposit 2 has reiterated the reasons given under Deposit 1 for the exclusion of the 1.31Ha portion of 084. The other "better located "sites mentioned in the reasons for screening out in Freystrop although not identified are presumably Poplar Meadow 035/00021 and Wil Meadow 035/00030. Of these Poplar Meadow only has one plot available for development while Wil Meadow (although appearing to provide adequate capacity for the level of development appropriate for the settlement)has been developed with executive style houses with the majority in the price range £5OOK to £625 K.									

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							as described by the Site Estate Agents in their marketing. Site 084 (larger part) would provide a development site in a setting more appropriate to Freystrop than Wil Meadow. It would not contribute to any form of ribbon development and the reconfigured boundary would also match that on the opposite side of Targate Road. Conclusion It is submitted that that larger part of Candidate Site 084 requires reconsideration for inclusion in LDP2 Deposit 2 on the basis of historical evidence that the site was previously within the development boundary/had been granted planning permission in the past/provides a viable and attractive alternative to the other sites in Freystrop.										
2603	Dwr Cymru		20	DP SP 7 Settlement Boundaries	Comment	No comment	**HSG/086/LDP2/3 Former Community Education Centre, Dew Street, Haverfordwest** 22 residential units A water supply can be provided for this site. The public sewerage network can accept the potential foul flows from the proposed development site. Site is crossed by 150mm and 300mm diameter sewers, and a 450mm surface water sewer. Merlin's Bridge Wastewater Treatment Works (WwTW) has limited capacity and the growth being proposed for the catchment	Haverfordwest & Merlins Bridge	HSG/040/LDP2/1	Comment noted. No change required.			It is noted that two foul sewers and a surface water sewer cross the site, which will need to be taken into consideration in designing the layout for the site. This can be included in the Development Sites and Infrastructure SPG.	No			

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							area will require improvements which would need to be funded through our Asset Management Plan (AMP) or potentially earlier through developer contributions.										
3135	H Merriman		1	DP SP 7 Settlement Boundaries	Comment	No	Regarding the land in question which is opposite Templeton school - We feel this site is an ideal site for a new devleopment as it is within the 20 mph speed limit with plenty of road frontage for parking etc. It has excellent visibility & there is already housing immediately next to the school., so we feel there should be no reason that our site should not be included in the forward planning. Planners seem to be expanding the Narberth area (over 90 proposed houses planned) & the sewage, school & doctors surgery cannot cope now.They should now be looking at villages outside the Narberth area for future development. We have been trying for planning on this site for over 40 years and we have never had a complete explanation as to why our site should not be included in forward planning.	Templeton	Candidate Site 034 Amber		The housing provision is set out in detail in the Plan to respond to the Plan's housing requirement and it is considered to be sufficient without the need to consider further housing sites.		This land formed part of a larger site that was considered through the Candidate Site process (Candidate Site ref 034) for residential development. That consideration concluded that additional land for housing in Templeton is not required, but a portion of the site was included in the Settlement Boundary as white land and can provide opportunity for windfall development. The remaining area of Candidate Site 034 was not included in the Settlement Boundary, nor allocated as sufficient land has been allocated for residential development in Templeton under Policy GN 16 (Residential Allocations)(ref. HSG/132/LDP2/1 West of Kings Park Farm) for 14 dwellings.	No			
3490	G & P Yeo		1	DP SP 7 Settlement Boundaries	Object	No	A detailed submission is provided supporting the inclusion of candidate site 436 at Hook commenting on the adjacent	Hook	Candidate Site 436		The amendment suggested is not		Candidate site reference 436 was previously considered unsuitable for development due to highway constraints. The	Yes		OE21, OE22	

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							planning permission site, the environment, utilities and infrastructure. A site plan is also provided.				supported by the Plan's evidence base.		submission provided correspondence with the Council's Highway Authority dated 13/03/2020, which stated two of the three reasons had been addressed leaving multi-modal access opportunities as a minor issue. The Local Planning Authority in part considers this point as part of the Rural Facilities Report (2020 with 2024 updates), as this determines which settlements are considered to be sustainable villages that can support housing development, which includes access to public transport. The Council's Highway Authority has been reconsulted and no longer object to the development of this site. The Local Planning Authority has undertaken further constraint checking, which has revealed potential mine entry shafts on and in close proximity to the site. It is therefore recommended that settlement boundary should remain as per the Deposit Plan. The Candidate Site Assessment should be updated to remove 'Highway' as the Deposit V2 Reason For Outcome and replace it with 'Mine shaft entries'. Whilst no representation was made on associated candidate site reference 437, which is a larger site area overlaying number 436, the candidate site register				

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													should be updated for consistency.				
3924	R Naden		1	DP SP 7 Settlement Boundaries	Comment	No comment	**Additional Candidate Site Register Comments: Candidate Site no 030 Location: Penally 4/6/2019** Dear Sirs, **Please find below the Additional Site Register Comments objecting to any development at this location. Serious Objections: PART ONE: Sewers and Drainage** Sewerage Capacity – is inadequate. The main sewer runs through gardens immediately to the North and West of the proposed development creating foul smells and other issues.. Given that the sewer is over-burdened already, residents have serious concerns about how their lives and health will be affected. **PART TWO: Previous planning applications** Applications to develop this site, stretching back to the 1970s, have been universally rejected by: Penally Community Council South Pembrokeshire District Council Pembrokeshire County Council The Welsh Office **Photos of formal refusals and letters of objection by the Community Council are included in the representations.** For the following reasons: Current sewerage system can't take it The cesspit system is unsatisfactory	Penally	Candidate Site 30	Agree no change required.			Candidate site 030 has not been allocated in the Deposit Plan, nor has it been included in the Settlement Boundary for Penally.	No			

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							and will cause future problem (affecting health and wellbeing) Detrimental to the skyline Difficulties with access to the site and its close location to the school, Difficulties with transportation links Traffic congestion and the impact on villagers – the village cannot take any further traffic Increased traffic and lack of pavements would prove hazardous The village road is narrow and tortuous having a sharp bend and no footpaths over its whole length. Increased traffic would result in an undesirable hazard for children and other pedestrians. Spoiling the countryside - Wasting good agricultural land Detriment to the area Failing to protect the rural landscape in a conservation area Because of the prominence and location in the landscape it was decided that the land should remain undisturbed - Visual intrusion and Linear Sprawl The site is within 300 PCNP and would seriously detract from the overall landscape character of the area Unsuitable in scale and character – adequate lands have already been granted for residential development, and that if further additional lands were needed in the future then more suitable lands lie within the village without recourse to this prominent site. There are serious environmental objections, effect on listed									

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							building and conservation area: Nature conservation: including disturbance of bat flying routes (protected species), hedgehogs (seriously threatened and in extreme decline), insect and beetle deletion, presence of owls Overlooking/loss of privacy and loss of light: for the residents adjoining the planned development, which is to the rear of many properties Parking may already become a problem as the free car park at the railway station becomes a paid for car park in Spring 2020, putting pressure on the village as people park on the roadside, before this development is even considered **PART FOUR: Designated Conservation Area** The following extract is taken from Pembrokeshire County Council's website: Conservation Areas What is a conservation area? A Conservation Area is defined as "an area of special architectural and historic interest, the character or appearance of which it is desirable to preserve or enhance" (Planning (Listed buildings and Conservation Areas) Act 1990). Therefore a Conservation Area is an area designated by the Council as an area of special architectural or historic interest. The designation of a Conservation Area enables the Council to monitor and guide change and to ensure that the									

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							character of the area is protected. Conservation Areas vary greatly in their nature and character and they contain the most historically and architecturally important and interesting parts of towns and villages. The designation of a Conservation Area is a prime means of recognising, protecting and enhancing the identity of places with special character. There are currently 24 conservation areas designated by Pembrokeshire County Council which cover 0.53% of the County. Carew Carew Cheriton CoshestonEglwyswrw Haverfordwest HoneyboroughLamphey Llangwm Llawhaden Mathry Milford Haven Narberth New Moat Neyland PembrokePembroke Dock **Penally** Scotsborough HouseSt. Dogmaels St. Florence Wiston We should like to be given access to The Conservation Area Appraisal for Penally. Previous refusals have demonstrated the special character and local distinctiveness of Penally. We call on the Council to honour its commitment: Public consultation will play a big part in the appraisal process. Local contribution is valued to ensure that:•The document is a good reflection of local knowledge and experience • It is as accurate and comprehensive as possible • It increases and shares an									

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							understanding of an area's special character •It ensures that everyone has a say in the management of the area We the undersigned residents of Penally, object in the strongest terms to this proposed development. Name Address										
3925	S & R Shefford		1	DP SP 7 Settlement Boundaries	Support	No comment	The representors provide a copy of an historic submission which objects to the inclusion of Candidate Site No 30 at Penally. The submission includes a petition from 2019, appeal decisions, commentary on previous planning decisions, commentary on sewage disposal, impacts on the skyline and impacts on the countryside.	Penally	Candidate Site No. 030	Agree no change required.			Candidate site 030 has not been allocated in the Deposit Plan, nor has it been included in the Settlement Boundary for Penally.	No			
3996	A Price		1	DP SP 7 Settlement Boundaries	Support	Yes	I agree with and support the sound decision by Pembrokeshire County Council that candidate site 484 in Haverfordwest is not suitable for development for mixed employment or housing. My reasons for opposing development at this site are as follows:- 1. The above Candidate site is currently Greenfield land outside the development boundary of the town. It is agricultural land with a Grade 3b rating according to the Agricultural Land Classification Predictive Map. Grade 3b land	Haverfordwest & Merlins Bridge	Candidate site 484	Support welcomed. No change required.				No			

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							can be used for a mix of agricultural activities, including arable farming and livestock grazing. Change of use of this land should be avoided especially as there is sufficient alternative unutilised land within the town boundary for the anticipated housing needs of this Local Development Plan Review spanning 2021 to 2033. 2. Candidate site 484 was previously submitted for development at an earlier Local Development Plan. It was rejected as the proposal then involved removing 20,000 tons of mudstone/shale from the field. I believe the owner currently operates from a garage at the rear of the Withybush Industrial Estate, the business comprises a Parts and Service Centre and a showroom for new and used vehicles. 3. The current proposal for the site by the owner is for mixed use developments comprising employment and residential use. The additional traffic from this proposed development will join the A40 at a bottleneck and bend on this hazardous stretch of road. It is obvious that the South Wales Trunk Road Agency (SWTRA) consider this section of the trunk road to be hazardous, the up and down lane are separated by double dotted lines with a wide central hatch in between. It is also considered necessary to monitor									

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							this hazardous stretch as two overhead cameras also keep watch on this bottleneck. Additional traffic to and from the proposed development is likely to impede traffic flow through this stretch of road and increase the current danger. 4. This candidate site is outside the town boundary, if planning approval is granted it will set a precedent and open the door to ribbon development and/or access to other Greenfield plots of land in the vicinity making a town boundary pointless. 5. Additional commercial and residential developments either side of the A40 between Scotchwell Roundabout and Haverfordwest Golf Club should be avoided. This section of the A40 is a pinch point on this important trunk road that not only serves Haverfordwest and a large part of Pembrokeshire but also forms part of the E30 Trans-European road network. The free flow of traffic along this section of road should not be further compromised, it is frequently used by ferry traffic and particularly the emergency services now that ambulances have to regularly travel this route to Carmarthen. If this section of road is blocked for a prolonged duration the only realistic alternative route around this section is South via the Cleddau Bridge and Pembroke. 6. There										

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							are unused greenfield and brownfield candidate sites within the town boundaries that will comfortably accommodate a substantial number of new dwellings to satisfy the needs of local people. These sites, which comprise in excess of 13 hectares of land, should be developed before any greenfield sites outside the town boundaries. Sites such as Shoals Hook Lane, the Mart Ground Bridge Meadow Lane, Tir Yn off Freemans Way and the Library/Dew Street plot. 7. A number of residential development sites within the town boundaries such as Albert Town, Slade Lane and Scarrowscant Lane are finally being developed and should satisfy housing requirements for a number of years. The need to allocate more land for development outside the existing town boundary is therefore considered unjustifiable. Meanwhile, if developers who have already been granted planning approval within the town boundary sit on their proposal and do not commence work in a reasonable time the planning approval for these should be withdrawn or offered to others.									

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3996	A Price		2	DP SP 7 Settlement Boundaries	Support	Yes	I agree with and support the sound decision by Pembrokeshire County Council that candidate sites 062, 063, 064 and 065 in Haverfordwest are not suitable for housing development. My reasons for opposing development at these sites are as follows:- 1. The above Candidate sites are currently Greenfield land outside the development boundary of the town. It is agricultural land with a Grade 3b rating according to the Agricultural Land Classification Predictive Map. Grade 3b land can be used for a mix of agricultural activities, including arable farming and livestock grazing. Change of use of this land should be avoided especially as there is sufficient alternative unutilised land within the town boundary for the anticipated housing needs of this Local Development Plan Review spanning 2021 to 2033. 2. If planning approval is granted for these candidate sites outside the current town boundary it will set a precedent and open the door to development and/or access to other greenfield plots of land in the vicinity which are outside the town boundary. 3. Development of these candidate sites will substantially add to current traffic flows on New Road, and Uzmaston Road. New Road/Uzmaston road is the only	Haverfordwest & Merlins Bridge	Candidate sites 062, 063, 064 & 065	Support welcomed. No change required.				No			

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							two lane road that motorists could use to and from the candidate sites, there are already three pinch points which frequently reduce this highway to a single lane due to parked vehicles. Meanwhile, the junction of New Road with Salutation Square roundabout is far from satisfactory it frequently causes traffic to tail back up New Road during rush hours. Additional traffic from new housing off Creamston Lane (or Clover Park) would further exacerbate an existing problem on both New Road and Uzmaston Road. 4. The foul sewers in New Road adjacent to and in Clover Park have been subject to problems over the years and are unlikely to have the capacity to accept new flows from additional housing at these candidate sites. 5. There are unused greenfield and brownfield candidate sites within the town boundaries that will comfortably accommodate a substantial number of new dwellings to satisfy the needs of local people. These sites, which comprise in excess of 13 hectares of land, should be developed before any greenfield sites outside the town boundaries. Sites such as Shoals Hook Lane, the Mart Ground Bridge Meadow Lane, Tir Yn off Freemans Way and the Library/Dew Street plot. 6. A number of residential									

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							development sites within the town boundaries such as Albert Town, Slade Lane and Scarrowscant Lane are finally being developed and should satisfy housing requirements for a number of years. The need to allocate more land for development outside the existing town boundary is therefore considered unjustifiable. Meanwhile, if developers who have already been granted planning approval within the town boundary sit on their proposal and do not commence work in a reasonable time the planning approval for these should be withdrawn or offered to others.										
3996	A Price		3	DP SP 7 Settlement Boundaries	Support	Yes	I agree with and support the sound decision by Pembrokeshire County Council that candidate site 141 in Haverfordwest is not suitable for housing development. My reasons for opposing development at this site are as follows:- 1. The above Candidate site is currently Greenfield land outside the development boundary of the town. It is agricultural land with a Grade 3b rating according to the Agricultural Land Classification Predictive Map. Grade 3b land can be used for a mix of agricultural activities, including arable farming and livestock grazing. Change of use of this land should be avoided especially as there is	Haverfordwest & Merlins Bridge	Candidate site 141	Support welcomed. No change required.				No			

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							sufficient alternative unutilised land within the town boundary for the anticipated housing needs of this Local Development Plan Review spanning 2021 to 2033. 2. If planning approval is granted for this candidate site outside the current town boundary it will set a precedent and open the door to development and/or access to other greenfield plots of land in the vicinity which are outside the town boundary. 3. Development of this candidate site will substantially add to current traffic flows on New Road, and Uzmaston Road. New Road/Uzmaston road is the only two lane road that motorists could use to and from this candidate site, there are already three pinch points which frequently reduce this highway to a single lane due to parked vehicles. Meanwhile, the junction of New Road with Salutation Square roundabout is far from satisfactory it frequently causes traffic to tail back up New Road during rush hours. Additional traffic from new housing off Creamston Lane (or Clover Park) would further exacerbate an existing problem on both New Road and Uzmaston Road. 4. The foul sewers in New Road adjacent to and in Clover Park have been subject to problems over the years and are unlikely to have the capacity to accept new flows from									

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							additional housing at this candidate site. 5. There are unused greenfield and brownfield candidate sites within the town boundaries that will comfortably accommodate a substantial number of new dwellings to satisfy the needs of local people. These sites, which comprise in excess of 13 hectares of land, should be developed before any greenfield sites outside the town boundaries. Sites such as Shoals Hook Lane, the Mart Ground Bridge Meadow Lane, Tir Yn off Freemans Way and the Library/Dew Street plot. 6. A number of residential development sites within the town boundaries such as Albert Town, Slade Lane and Scarrowscant Lane are finally being developed and should satisfy housing requirements for a number of years. The need to allocate more land for development outside the existing town boundary is therefore considered unjustifiable. Meanwhile, if developers who have already been granted planning approval within the town boundary sit on their proposal and do not commence work in a reasonable time the planning approval for these should be withdrawn or offered to others.									

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3996	A Price		4	DP SP 7 Settlement Boundaries	Support	Yes	I agree with and support the sound decision by Pembrokeshire County Council that candidate site 383 in Haverfordwest is not suitable for housing development. My reasons for opposing development at this site are as follows:- 1. The above Candidate site is currently Greenfield land outside the development boundary of the town. It is agricultural land with a Grade 3b rating according to the Agricultural Land Classification Predictive Map. Grade 3b land can be used for a mix of agricultural activities, including arable farming and livestock grazing. Change of use of this land should be avoided especially as there is sufficient alternative unutilised land within the town boundary for the anticipated housing needs of this Local Development Plan Review spanning 2021 to 2033. 2. If planning approval is granted for this candidate site outside the current town boundary it will set a precedent and open the door to development and/or access to other greenfield plots of land in the vicinity which are outside the town boundary. 3. Development of this candidate site will substantially add to current traffic flows on New Road, and Uzmaston Road. New Road/Uzmaston road is the only two lane road that motorists	Haverfordwest & Merlins Bridge	Candidate site 383	Support welcomed. No change required.				No			

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							could use to and from this candidate site, there are already three pinch points which frequently reduce this highway to a single lane due to parked vehicles. Meanwhile, the junction of New Road with Salutation Square roundabout is far from satisfactory it frequently causes traffic to tail back up New Road during rush hours. Additional traffic from new housing off Creamston Lane (or Clover Park) would further exacerbate an existing problem on both New Road and Uzmaston Road. 4. The foul sewers in New Road adjacent to and in Clover Park have been subject to problems over the years and are unlikely to have the capacity to accept new flows from additional housing at this candidate site. 5. There are unused greenfield and brownfield candidate sites within the town boundaries that will comfortably accommodate a substantial number of new dwellings to satisfy the needs of local people. These sites, which comprise in excess of 13 hectares of land, should be developed before any greenfield sites outside the town boundaries. Sites such as Shoals Hook Lane, the Mart Ground Bridge Meadow Lane, Tir Yn off Freemans Way and the Library/Dew Street plot. 6. A number of residential development sites within the town									

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							boundaries such as Albert Town, Slade Lane and Scarrowscant Lane are finally being developed and should satisfy housing requirements for a number of years. The need to allocate more land for development outside the existing town boundary is therefore considered unjustifiable. Meanwhile, if developers who have already been granted planning approval within the town boundary sit on their proposal and do not commence work in a reasonable time the planning approval for these should be withdrawn or offered to others.										
3996	A Price		5	DP SP 7 Settlement Boundaries	Support	Yes	I agree with and support the sound decision by Pembrokeshire County Council that candidate site 384 in Haverfordwest is not suitable for housing development. My reasons for opposing development at this site are as follows:- 1. The above Candidate site is currently Greenfield land outside the development boundary of the town. It is agricultural land with a Grade 3b rating according to the Agricultural Land Classification Predictive Map. Grade 3b land can be used for a mix of agricultural activities, including arable farming and livestock grazing. Change of use of this land should be avoided especially as there is sufficient alternative unutilised	Haverfordwest & Merlins Bridge	Candidate site 384	Support welcomed. No change required.				No			

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							land within the town boundary for the anticipated housing needs of this Local Development Plan Review spanning 2021 to 2033. 2. If planning approval is granted for this candidate site outside the current town boundary it will set a precedent and open the door to development and/or access to other greenfield plots of land in the vicinity which are outside the town boundary. 3. Development of this candidate site will substantially add to current traffic flows on New Road, and Uzmaston Road. New Road/Uzmaston road is the only two lane road that motorists could use to and from this candidate site, there are already three pinch points which frequently reduce this highway to a single lane due to parked vehicles. Meanwhile, the junction of New Road with Salutation Square roundabout is far from satisfactory it frequently causes traffic to tail back up New Road during rush hours. Additional traffic from new housing off Creamston Lane (or Clover Park) would further exacerbate an existing problem on both New Road and Uzmaston Road. 4. The foul sewers in New Road adjacent to and in Clover Park have been subject to problems over the years and are unlikely to have the capacity to accept new flows from additional housing at this									

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							candidate site. 5. There are unused greenfield and brownfield candidate sites within the town boundaries that will comfortably accommodate a substantial number of new dwellings to satisfy the needs of local people. These sites, which comprise in excess of 13 hectares of land, should be developed before any greenfield sites outside the town boundaries. Sites such as Shoals Hook Lane, the Mart Ground Bridge Meadow Lane, Tir Yn off Freemans Way and the Library/Dew Street plot. 6. A number of residential development sites within the town boundaries such as Albert Town, Slade Lane and Scarrowscant Lane are finally being developed and should satisfy housing requirements for a number of years. The need to allocate more land for development outside the existing town boundary is therefore considered unjustifiable. Meanwhile, if developers who have already been granted planning approval within the town boundary sit on their proposal and do not commence work in a reasonable time the planning approval for these should be withdrawn or offered to others.									
4001	D Webb		1	DP SP 7 Settlement Boundaries	Object	No	CYM213119 The field 977 south west side of Ash lane Tavernspite.nr the southern end junction with lime road. Opposite	Tavernspite	LDP2/Deposit2/New Site 21		The housing provision is set out in detail in the		The level of growth required during the Plan Period and the delivery of housing is set out in detail in the Housing	No			

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							the bungalows Four winds ty paranor Ahsbourne and Cairncroft. FIELD NUMBER 977.. i would like this area tobe included GN16 POLICY for development residential planning.please. to include SP7. Site Notes:- Settlement name : Tavernspite (PM25) Proposal map ref. PM25 Field 374 at Tavernspite (PM25), has a burial chamber located in the field. Therefore, not allocated due to archaeological concerns. I would like to include field number 977 into the SP7 AND GN16 Tavernspite settlement area for residential development (PM25), as the area has easy access and no archaeological concerns. It would be perfect for a small development, including low cost environmentally-friendly housing, using water-conservation, renewable energy, smart technology, energy star appliances, reclaimed wood, natural lighting and ventilation. This would be a perfect development area for Tavernspite as it is small and perfectly located.it is opposite four other bungalows.and could be set back from the road slightly to keep all existing hedges and boundaries. A Map showing the extent of the site proposed is included in the representation.				Plan to respond to the Plan's housing requirement and it is considered to be sufficient without the need to consider further housing sites.		Requirement Background Paper. Tavernspite is classed as a Service Village in Policy SP 6 (Settlement Hierarchy) of the Plan. This site was not submitted for consideration as a Candidate Site. Three other Candidate Sites were assessed at Tavernspite (refs, 134, 282 and 374). Site 282 was retained within the Settlement Boundary for but not allocated. Due to the size and shape of the site it is unlikely to accommodate more than 3 or 4 dwellings which falls below the threshold of 5 for allocation. Site 374 was also included within the Settlement Boundary but not allocated due to there being archaeological interest within the site requiring further evaluation should a planning application come forward. A tumulus is present at the southern end of the site, although it is a large site and there remains potential for some residential development. Both these sites are well-related to the built form of the village. A third Candidate Site (134) was considered appropriate for residential development but excluded from the Settlement Boundary as the other Candidate Sites were considered to be more appropriate. No further land is required for residential				

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													development at Tavernspite during the Plan period.				
4211	Mr & Mrs Platten		1	DP SP 7 Settlement Boundaries	Object	No	Include Candidate site 052 in the Settlement Boundary. A detailed submission is provided setting out the background, current state of affairs and argument along with a conclusion.	Freystrop	Candidate Site 052		The amendment suggested is not supported by the Plan's evidence base.		The site was submitted for consideration as a Candidate Site. The assessment found the site suitable for residential development, but less well-related to the settlement of Freystrop than other sites which were allocated to meet the level of growth required for the village. It is not considered necessary to include additional land for development.	No			
4341	PETITION Mr Eynon		1	DP SP 7 Settlement Boundaries	Support	Yes	**Representative (Chief Petitioner) chosen unanimously after discussion with every signatory – see attached sheet – representing 24 people Candidate Site ref 379 Llanddewi Velfrey_,** The undersigned wish to make these comments: This site was put forward during the Candidate Site applications period but has not been included in the Deposit Plan 2 because it was seen to be too big in its entirety compared to the size of the village and sufficient land is available in the wider local area. (so advised at the Drop In Session in Crymych on 21/10/24). We were also informed that the landowner could submit an amended plan at any time up to the closure of the consultation period on 16/12/24 and were advised to make representations	Llanddewi Velfrey	Candiate Site 379	Comment noted. No change required.				No			

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							on this basis as we do not support allocation of any part of this site. Our comments are: 1/As sufficient land is available elsewhere (see above) it would be unnecessary to spoil good agricultural land needlessly. 2/ This is a greenfield site on steeply sloping high ground and part of unspoilt countryside visible from as much as 15 km away especially from the north and west and is rich in wild life. 3/ As the site is in such a prominent position it would adversely affect the amenities of existing properties and their right to privacy and light. 4/ Access would probably be along narrow unclassified roads. There are complaints now about the amount of traffic which would be worse if the site was allowed. 5/The LDP takes into account issues of sustainability and the environment. Apart from a small village shop which the owner says will probably close when the bypass opens in 2025 there are no amenities or work in the village. Work, schooling and shopping would involve travelling and poor public transport means cars are the only practical method of travel. 6/ This site was put forward in the original LDP 1 and was turned down. Nothing has changed in the intervening years to support its inclusion in the Deposit Plan 2.									

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4349	Freystrop CC, Middle Hill Chapel, Messrs K & K Locke	W D Thomas (34589)	1	DP SP 7 Settlement Boundaries	Object	No	**Statement in respect of adjacent candidate sites 051 and 053 Freystrop:** A detailed submission is provided setting out the background, current state of affairs, argument for inclusion, ownership, anomaly in the village development boundary and conclusion.	Freystrop	Candidate Site 051 and 053		The amendment suggested is not supported by the Plan's evidence base.		The Candidate Site Assessment identifies these sites as passing all phases but they are not required for the Plan's housing land supply. An alternative site with planning permission (listed under Policy GN 17 Housing Commitments) 035/00030 provides a level of growth appropriate for settlement . Since the time of writing 6 Coal Mine Entry Points have been identified across candidate sites 51 and 53, . An edit is required to the Candidate Site Register so that CS.51 and 53 should read: Deposit V2 Candidate Site Assessment Phase 'Phase 3'. Deposit V2 Reason For Outcome 'Coal Mine Entry Points. Six entry points have been identified across Candidate Sites 51 and 53, with a further 3 close to the site boundary'. Deposit V2 Outcome Category 'Red 4'. These sites are therefore considered to be constrained and unsuitable for inclusion within the settlement boundary	Yes		OE01	
4351	S & K Annadale		1	DP SP 7 Settlement Boundaries	Comment	No comment	**Building Plot 1 Panteg Manorowen Fishguard SA65 9QD, In between Maes yr Rhos and Hafan Deg.** Ordnance Survey coordinates 192399.25 – 234768.75 Plot 1 is part of O.S No 2682 **Panteg** LDP – adopted 2013 Chapter 6 General policies Paragraph 6.110 Building Notice deposited	Panteg	LDP2/Deposit2/New Site 4	Comment noted. No change required.			For LDP 2, Deposit Plan 2, Panteg is classified as a Local Village and has its own Inset Map with a 'blue line' Settlement Boundary. The reasoned justification to policy SP 6 (Settlement Hierarchy - A Sustainable Settlement Strategy), paragraph 4.31 table, indicates that in Local Villages, windfall market housing, local	No			

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							20/2/2002 Completion Inspection made 26/11/2004 Purchased with outline consent in September 2002. Granted for residential development two building plots land at Panteg Manorowen on 08/08/2001 Application No 01/306/PA and subsequently Reserved Matters. Mains water has been connected to the front boundary. Mains electric is available in the front boundary. Mains drainage disects the plot. Furthermore we have carried out works to the site in preparation for site work commencement to include installation of a perimeter land drain on the 8th of February 2003, Waste removal from site on the 17th of September 2004 and subsoil delivered to site on the 30th of September 2004. Built a perimeter boundary wall between plots 1 and 2 on the 28th of August 2004. This is a straightforward plot of land situated between two domestic 2 storey five and four bedroom houses. It has lapsed outline planning for a domestic dwelling before the local authority changed the development requirements to a hamlet and prevented us from building our family home. In 2009 we have written to our neighbours enclosing our intended architectural plans to show our intended development of our						needs affordable housing and exception sites for affordable housing are possible. Policy SP 10 (Local Villages) provides more detail of what might be possible, with paragraph 4.52 of the reasoned justification indicating that such villages are not expected to accommodate significant levels of development during the Plan period and that no housing allocations are made for Local Villages. Nonetheless, in that context, a small-scale housing proposal within the defined Local Village Settlement Boundary should, in principle, be supported. That is also evident from GN 13 (Residential Development), where criterion 1 says that open market housing or affordable housing within the Settlement Boundary of a Local Village will be permitted (in principle). Within the LDP 2 framework as drafted at Panteg, it should be possible for the representors to re-apply for planning permission for their proposals with a reasonable expectation of a successful outcome. The application would take into consideration any affordable housing contributions required by the relevant policies of the Plan.				

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							family home. We are Welsh natives born in Fishguard and Cardiff with a keen interest to return to the area. We are Welsh speakers and our son is studying to be a paramedic hoping to secure employment with Hywel Dda Health Board and our daughter a property surveyor. Our intention is to build our family home in preparation for our retirement and also for our next generation. **Map provided with original representation showing the plot in red.**										
4361	Mr M Clark	Evans Banks Planning Ltd(1966)	1	DP SP 7 Settlement Boundaries	Object	No	Request that the settlement limits be extended, and the site be included within the defined development limits for the settlement of **Penally**. 15 page submission providing a site context, photographs, an appraisal of environmental considerations , national planning policy considerations etc.. **Map of the site also included.**	Penally	Candidate Site 389		The amendment suggested is not supported by the Plan's evidence base.		The site was considered through the Candidate Site process (Candidate Site ref 389) and was assessed to be inappropriate for development for landscape reasons. The site forms the south-east corner of a large field which appears to be in agricultural use. There is housing to the east, separated from the site by a mature hedgerow which also runs along the southern boundary, marking the wider field boundaries. As stated in the representation (paragraph 2.1.2) the northern site boundaries are open onto an existing agricultural field. The land in this location is elevated with extensive views towards the coast. When viewed from the Coat Path to the south within Pembrokeshire Coast National Park, development of the site would be a clear and strong	No			

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													incursion into the countryside, beyond the currently strong boundary formed by the eastern boundary hedgerow of the field. Development here would not constitute infill nor rounding off and is not considered appropriate for development.				
4368	Amity Planning (M Southall on behalf of Wales & West)		3	DP SP 7 Settlement Boundaries	Object	No	**2 Land at Nant Y Fyynnon, Letterston, Pembrokeshire, SA62 5SX:** This representation is accompanied by the following drawings and documents: - Site Representation Statement (240098SRS-01) - Site Location Plan and Context Plan (R521 - SK-20) - Site Constraints Plan (R521-SK-25) - Concept Site Plan (R521-SK-28A) - SWOT Analysis Plan (R521-SK-24) - Key Points Plan (R521 - SK-21) - Agricultural Land Classification Survey (December 2024) - Landscape Character & Visual Impact Assessment (TDA3015LC&VIARhC11.24) - Ecology Report Update (1963 002) - Transport Statement - Sustainability Appraisal (December 2024 – Rev 2) **Also referenced in the Comments Form: Page 50, Paragraph 4.32 Pages 124-130, Paragraphs 5.102-5.105 Proposal Map (PM09) Letterston (Inset Index Map 55)**	Letterston	LDP2/Deposit2/New Site 10			The amendment suggested is not supported by the Plan's evidence base.		Although submitted as an Alternative Site (New Site 10), this site was put forward at Candidate Site stage, albeit not by this representor. At Candidate Site stage, there were several other submissions asking for the site to remain in its current use. The residential proposal for the site was rejected on the grounds of it being Agricultural Land Classification (ALC) grade 3a land and because it was in the Strategic Flood Consequences Assessment (SFCA) yellow category. It is also worth noting that Letterston village already has committed residential sites and that an allocation has been identified elsewhere in the village. With regard to the ALC issue, the representor claims that the current grade is 3b, but this is not the case. Evidence has been provided to suggest that the land is grade 3b (which is cited as being a confirmation of the existing grade, but in fact is not so). The grade has not been formally changed. There is a process to be followed to	No			

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													formally change an ALC grading. The change needs to be put forward and then agreed by Welsh Government. The grade 3a listing is what is shown on the ALC maps. The ALC maps are on the WG / Data Map Wales website. However, to note that most land adjacent to the existing built up area of Letterston is currently classified as grade 3a, so this site is not exceptional in that regard. The SFCA yellow category is a constraint the site is not classified as being at flood risk by the Natural Resources Wales Development Advice Map. However, this has not been updated for some time and the more recent Flood Map for Planning (a material planning consideration) identifies a small stream / surface water flooding issue running right across the site. This constraint makes the site less desirable for future development than those already committed / allocated by LDP 2. In the event that affordable housing supply is shown to be constrained in the village, it could potentially be brought forward as an exception site, as it lies adjacent to the Settlement Boundary. The proposer has indicated a willingness to consider such a proposal, albeit perhaps in the context of a 100%				

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													AH allocation rather than as an exception site.				
4368	Amity Planning (M Southall on behalf of Wales & West)		5	DP SP 7 Settlement Boundaries	Object	No	**3. Land at Golwg Y Llan, Eglwyswrw, Crymych, Pembrokeshire, SA41, 3UP** This representation is accompanied by the following drawings and documents: - Site Representation Statement (240096SRS-01) - Site Location Plan (R585-SK-03) - Existing Topogrpahical Survey (R585-S-01) - Development Site Constraints Plan (R585 SK-02) - Feasibility Site Layout (R585 SK-01A) - Agricultural Land Classification Survey (April 2024) - Landscape Character & Visual	Eglwyswrw	LDP2/Deposit2/New Site 11		The housing provision is set out in detail in the Plan to respond to the Plan's housing requirement and it is considered to be sufficient without the need to consider further		Although submitted as an Alternative Site, this site was put forward as a part of larger Candidate Site (ref. CS 230) and was considered in the Candidate Site Assessment. Part of the original Candidate Site is now a housing commitment and has recently been completed. The rest of the site was rejected on the grounds that the site would provide an inappropriate level of growth within the settlement. This argument remains as the level of growth required in the plan period has been met by the existing housing commitment.	No			

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							Impact Assessment (TDA2993LC&VIARhC08.24) - Preliminary Ecological Appraisal (April 2024) - Transport Statement (1737-ACS-ZZ-XX-RP-T-241-B) - Sustainability Appraisal (December 2024 – Rev 2)**Also referenced in the Comments Form: Page 50, Paragraph 4.32 Pages 124-130, Paragraphs 5.102-5.105 Proposal Map (PM5) Eglwyswrw (Inset Index Map 42)**				housing sites.		Looking at broader issues, PCC has already identified sufficient land at Service Village level across its Plan area and the introduction of this further site would risk over-providing against the plan's strategy in that respect.				
4368	Amity Planning (M Southall on behalf of Wales & West)		7	DP SP 7 Settlement Boundaries	Object	No	**4. Land adjacent to Maes Merydd, Llandissilio, SA66 7TG** This representation is accompanied by the following drawings and documents: - Site Representation Statement (240097SRS-01) - Site Location and Existing Block Plans (100 A) - Proposed Site Plan (101 A) - SWOT Analysis Plan (102 A) - Agricultural Land Classification Survey (February 2024) - Landscape Character & Visual Impact Assessment (TDA2953LC&VIARhC04.24) - Preliminary Ecological Appraisal (March 2024) - Transport Statement (1431-ACS-ZZ-XX-RP-T-241-B) - Sustainability Appraisal (December 2024 – Rev 2)**Also referenced in the Comments Form: Page 50, Paragraph 4.32 Pages 124-130, Paragraphs 5.102-5.105 Proposal Map**	Llandissilio	LDP2/Deposit2/New Site 12		The housing provision is set out in detail in the Plan to respond to the Plan's housing requirement and it is considered to be sufficient without the need to consider further housing sites.		This representation proposes an alternative site for an allocation for residential use, adjoining the Llandissilio Settlement Boundary. This submission has come late in the LDP 2 plan preparation process, the site has therefore not been constraint checked through the Candidate Site assessment process. There is a housing allocation in the village and other areas of white land which provide the level of growth appropriate for the settlement. Looking at broader issues, PCC has already identified sufficient land at Service Village level across its Plan area and the introduction of this further site would risk over-providing against the plan's strategy in that respect. PCC is also concerned that introducing a completely new site to a rural settlement at this late stage in the process would not be ideal,	No			

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							(PM17) Llandissillo (Inset Index Map 56)						as there has been no prior community consultation. As such, PCC would suggest that the best way forward is not to allocate this site through LDP 2 or place it in the Settlement Boundary, but rather to await the next Plan review, at which point it could be put forward for consideration through the Candidate Site process and be properly tested throughout the Plan process.				
4378	Cwm Arian Renewable Energy Ltd (CARE)		1	DP SP 7 Settlement Boundaries	Object	No	A detailed submission is provided arguing for the inclusion of a proportion of candidate site 331 for residential allocation within Tegryn LDP. A map showing the extent of the site is also included.	Tegryn	Candidate Site 331		The housing provision is set out in detail in the Plan to respond to the Plan's housing requirement and it is considered to be sufficient without the need to consider further housing sites.		The Candidate Site 331 was considered in the Site Assessment and was rejected on the grounds that a housing commitment in the village provided the level of growth appropriate for the settlement. Looking at broader issues, PCC has already identified sufficient land at Service Village level across its Plan area and the introduction of this further site would risk over-providing against the plan's strategy in that respect. In the event that affordable housing supply is shown to be constrained in the village, it could potentially be brought forward as an exception site, as it lies adjacent to the Settlement Boundary.	No			

Representor Number	Representor	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
													The Candidate Site Assessment identifies these sites as passing all phases but they are not required for the Plan's housing land supply. An alternative site with planning permission listed under Policy GN 17 (Housing Commitment) 035/00030 provides a level of growth appropriate for the settlement . Since the time of writing 6 Coal Mine Entry Points have been identified across candidate sites 51 and 53. An edit is required to the Candidate Site Register so that CS.51 and 53 read: Deposit V2 Candidate Site Assessment Phase 'Phase 3'. Deposit V2 Reason For Outcome 'Coal Mine Entry Points. Six entry points have been identified across candidate sites 51 and 53, with a further 3 close to the site boundary'. Deposit V2 Outcome Category 'Red 4'. These sites are therefore considered to be constrained and unsuitable for inclusion within the settlement boundary				
4348	Mr R Morgan	W D Thomas (34589)	1	DP SP 7 Settlement Boundaries	Object	No	**Statement in respect of adjacent candidate sites 051 Freystrop:** A detailed submission is provided setting out the background, current state of affairs, argument for inclusion, ownership, anomaly in the village development boundary and conclusion.	Freystrop	Candidate Site 051		The amendment suggested is not supported by the Plan's evidence base.			Yes		OE01	
4386	Day's Property Holdings Limited	Agent Montagu Evans LLP(4244)	3	DP SP 7 Settlement Boundaries	Object	No	The location outside of **the Settlement Boundary** in the Deposit version of the forthcoming Local Development Plan is of concern to Day's in respect of the soundness of the forthcoming Plan and the management of their asset. Accordingly, they respectfully request that the Council reconsider the Settlement	Haverfordwest Withybush Road	S/EMP/040/C1, Withybush cluster (West Estate) S/EMP/040/00001		The amendment suggested is contrary to National Planning Policy and/or Guidance.		It is the view of PCC that the Employment Sites at Withybush should not be included in the Haverfordwest Settlement Boundary. Their inclusion within a Settlement Boundary could potentially result them being used for non-employment related uses, including residential development, which would be permitted within	No			

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							Boundary limits as set out in the Proposals Map attached to the Deposit version of LDP2. A number of observations are made to support inclusion of the site. See original submission.						Settlement Boundaries, which would detract from the Strategic and Local Employment provisions made at Withybush and might lead to the introduction of other uses, better located on sites closer to the services and facilities in the town, in particular the town centre. It could also reduce the supply of suitable employment land. Whilst noting that there is currently an element of mixing of land uses at Withybush, the Council's view that the land uses at this location should continue to have a predominantly employment-related focus, while recognising that some flexibility is needed where non-employment uses closely related to an employment use are proposed.				
4392	B Griffiths		1	DP SP 7 Settlement Boundaries	Object	No	Include Candidate Site 468 within Treffgarne settlement boundary.	Treffgarne	Candidate Site 468		The amendment suggested is contrary to National Planning Policy and/or Guidance.		The representation relates to Candidate Site 468, which proposed residential development on a 1.52 hectares site. LDP 2 identifies Treffgarne as a Local Village. Significant future development is not being sought in settlements in this position in the Settlement Hierarchy and the Candidate Site was rejected because although it was adjacent to a Local Village boundary. The Settlement Boundary review concluded that no part of the site in question should be	No			

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													included within the Treffgarne Settlement Boundary.				
4393	Welsh Government Place Division, Housing and Regeneration Directorate	Lichfields (4394)	4	DP SP 7 Settlement Boundaries	Support	Yes	We support the location of the settlement boundaries for Haverfordwest and the inclusion of the proposed development site at Slade Lane within the defined urban area. This approach highlights the importance of the Slade Lane allocation to the LDP strategy and the delivery of future development to meet identified needs in a highly sustainable location alongside one of the main settlements in Pembrokeshire.	Haverfordwest & Merlins Bridge	S/HSG/040/LDP2/6	Support welcomed. No change required.							
4397	C Edwards		1	DP SP 7 Settlement Boundaries	Object	No	Candidate Site 503: This is a small hamlet with no facilities and a very dangerous crossroads. The small community cannot withstand a large influx of people. No shop and no school which means more traffic on the road.	Rhoshill	Candidate Site 503	Comment noted. No change required.			Candidate Site 503 was screened out during the Candidate Site Assessment and has not been brought forward. The site has not been allocated or included in the settlement boundary.	No			
4402	D & S Voaden	Hayston Developments & Planning Ltd (1975)	1	DP SP 7 Settlement Boundaries	Object	No	Reinstatement of Settlement Limits only in the main rural town of Narberth See attached report and map extract.This objection relates to the proposed redrafting of the settlement boundary for Narberth to exclude land to the rear of Llwynon, 61 St James Street, Narberth – part of which	Narberth	LDP2/Deposit2/New Site 33		The most up to date information available at the time of the base date of the Deposit Plan		A planning application for 3 dwellings on this site is currently being considered by the Council under LDP1 (February 2025). Should it be approved then any necessary changes to the Settlement Boundary can be taken into account during the next Review of the Plan.	No			

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							lies within the garden area / curtilage of the property. A detailed statement is provided.				preparation has been used in Plan preparation.						
4421	Defence Infrastructure Organisation (DIO)	Avison Young (4369)	3	DP SP 7 Settlement Boundaries	Object	No	Policy SP 2 (Housing Requirement) Policy GN 16 (Residential Allocations) Policy SP 7 (Settlement Boundaries)Not previously submitted as a Candidate Site but would like to add a new site allocation: **Land at Penally Training Camp, Barrack Road, Penally, SA70 7QW**. The detailed submission includes: a constraints plan; a copy of the DVM for alternative sites; Illustrative Master Plans Options 1,2,3.; site location plan; sustainability appraisal; viability assessment and a written representation.	Penally	LDP2/Deposit2/New Site 13		The housing provision is set out in detail in the Plan to respond to the Plan's housing requirement and it is considered to be sufficient without the need to consider further housing sites.		The level of growth required during the Plan Period and the delivery of housing is set out in detail in the Housing Requirement Background Paper. This is a large site measuring approximately 3.95ha. Development of the site at various densities has been proposed by the representor to accommodate from 118 dwellings to 188 dwellings which is a substantial number of new houses. Penally is classed as a Service Village in the Settlement Hierarchy of the Plan. No residential allocations have been made in the village but this is the same for several other Service Villages throughout the Plan area. Several Candidates Sites were submitted for Penally and have been fully considered as part of the Plan process. Part of Candidate Site 181 was included within the Settlement Boundary for Penally and will allow for a limited number of houses. Four Candidate Sites were considered to be inappropriate for residential development and a further one site (376) was rejected as there was other land more suitable for				

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													development (part of Candidate Site 181). The site proposed in this representation was not submitted for consideration as a Candidate Site. Looking at broader issues, the Council has already identified sufficient land at Service Village level across its Plan area and the introduction of this further site would risk over-providing against the plan's strategy in that respect. The Council considers that introducing a large site to a rural settlement at this late stage of the Plan process would not be ideal and it would be more appropriate to consider it through the next Review of the Plan when it can be fully considered and tested.				
4431	Mr Llewellyn	Harries Planning (4430)	1	DP SP 7 Settlement Boundaries	Object	No	This representation seeks the inclusion of the above-mentioned site as 'white land' within the revised settlement boundary of Hermon, a designated Service Village within the Deposit LDP. It is submitted on behalf of our client and landowner Mr Llewellyn. Having considered the consultation documents, it is contended that the LDP is unsound under Soundness Test No. 2 'Is the plan appropriate', in that it fails to address a local need for a mix of housing provision within Hermon and its surrounding rural area.	Hermon	Candidate Site 227		The housing provision is set out in detail in the Plan to respond to the Plan's housing requirement and it is considered to be sufficient without the need to consider further		Candidate Site 227 was considered in the Candidate Site Assessment and was rejected on the grounds that a housing commitment in the village will provide the level of growth appropriate for the settlement (- see Policy GN 17 042/00013). It is also better related to built form by comparison. Looking at broader issues, PCC has already identified sufficient land at Service Village level across its Plan area and the introduction of this further site would risk over-providing against the plan's strategy in that respect. In the event that affordable housing	No			

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							Furthermore, this site's omission does not appear to be consistent with the LDP's evidence base and drafted policies. The submission comments on the Deposit Plan, the proposed site, and the soundness tests. A map showing the site is also included.				housing sites.		supply is shown to be constrained in the village, it could potentially be brought forward as an exception site, as it lies adjacent to the Settlement Boundary.				
4432	Mr Davies	Harries Planning (4430)	1	DP SP 7 Settlement Boundaries	Object	No	Candidate Site 314This representation seeks the inclusion of the above-mentioned site as 'white land' within the revised settlement boundary of Abercych, a designated Local Village within the Deposit LDP2. It is submitted on behalf of our client and landowner Mr Davies. Having considered the consultation documents, it is contended that the LDP is unsound under Soundness Test No. 2 'Is the plan appropriate', in that it fails to address a local need for infill and rounding off plots within Abercych and its surrounding rural area. Furthermore, this site's omission does not appear to be consistent with the LDP's evidence base and drafted policies. The detailed submission comments on the Deposit Plan, the Proposed Site and the soundess tests. A map showing the site is also included.	Abercych	Candidate Site 314		The amendment suggested is not supported by the Plan's evidence base.		Abercych is classified as a Local Village in the LDP 2, Deposit Plan 2 Settlement Hierarchy. At this level of the Hierarchy, Settlement Boundaries are used to provide clarity on where opportunities for infill and rounding-off for housing may be suitable. Generally, Local Villages will have 1- 2 plots available for housing. Abercych already has a number of potential white-land sites where housing may come forward. Therefore, inclusion of a further site within the Abercych Settlement Boundary would result in a scale of development disproportionate for a village of this scale and in this position in the LDP 2 Settlement Hierarchy. Hence, no change to the Plan is proposed.	No			

Representor Number	Representor	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
4442	Ateb & T Rowe	Pembroke Design Ltd (4441)	1	DP SP 7 Settlement Boundaries	Object	No	Part of the site is already within the development boundary. Our suggestion is to push the red line out to round off the development boundary. Planning Approval 09/1193/PA already goes beyond the red line development boundary of proposed LDP2. Suggest it is pushed out further to round off development. Also relocate farmhouse and its outbuildings. A statement and a proposed layout is provided. The statement provides a brief history of the site, current demand for housing in Pentlepoir, maps from the current LDP, sales brochures for Holborn Gardens, documentation from the Joint Unitary Development Plan preparation, copy of a planning permission, a copy of a supporting statement from 2017 and a layout dated November 24.	Pentlepoir	Candidate Site 90		The housing provision is set out in detail in the Plan to respond to the Plan's housing requirement and it is considered to be sufficient without the need to consider further housing sites.		This land formed part of a larger site that was considered through the Candidate Site process (Candidate Site ref 090) for a mixed-use development of housing and holiday accommodation. That consideration concluded that additional land for housing in Pentlepoir is not required, but a portion of the site was included in the Settlement Boundary as white land and can provide opportunity for windfall development. The area of land now the subject of this representation was not included in the Settlement Boundary nor allocated due to sufficient land having beeen allocated for Pentlepoir in Policy GN 16 of the Plan (Residential Allocations) (ref HSG/132/LDP2/1) to provide 14 dwellings. The outline planning application referred to in the representation lapsed in 2014.	No			
4448	Carew Castle Estate	Edward H Perkins(2348)	1	DP SP 7 Settlement Boundaries	Object	No	The site lies to the south of the existing adopted Local Development Plan employment land allocation - EMP/000/01. It occupies 11.35 hectares of land directly to the south-west of the intersection between the two main runway areas. Although it includes undeveloped land, it also includes former airfield land, together with existing uses which include scrap metal premises and breeze block and aggregate	Carew & Sageston	Candidate Site 286		The amendment suggested is not supported by the Plan's evidence base.		The general approach taken by PCC in preparing LDP 2 is to place industrial sites that are peripheral to settlements outside Settlement Boundaries. This matter is referenced in the Settlement Boundary Methodology, which forms a part of the Plan's evidence base, where it says: 'Employment allocations and existing employment sites on the periphery of a settlement which	No			

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							manufactures/distributors. There is therefore an existing employment use of the land, with infrastructure and roadways in place. The site is situated close to the A477 truck road providing excellent transport links. Map included.						are significant in size in comparison with the settlement's scale, or are clearly beyond a settlement, are excluded from the Settlement Boundaries'. This will help to protect the use of the land for employment purposes and reduce the potential for it to be used for alternative uses which are generally permitted within settlement boundaries. Placing this particular site within the Carew and Sageston Settlement Boundary would be inappropriate in this context.				
34412	Mr & Mrs Scriven	W D Thomas (34589)	1	DP SP 7 Settlement Boundaries	Object	No	Candidate Site 022 Land north of Langford Farm, Johnston: A submission is provided outlining the background to the proposal, outlining the current situation an argument for inclusion and a conclusion.	Johnston	Candidate Site 022 and HSG/048/LDP2/1		The amendment suggested is not supported by the Plan's evidence base.		Candidate Site Register. The part allocation of CS.022 as HSG/048/LDP2/1 and CS.102 as HSG/048/00038 provide an adequate level of growth for the village over the Plan period.	No			
34426	Park House Court Ltd	Halsall Lloyd Partnership (1640)	1	DP SP 7 Settlement Boundaries	Object	No	The lower part of this site between Garden Meadow Way and the natural boundary with Park House Court Care Ltd is currently under public consultation ahead of submission of a planning application for a much needed food retail outlet being proposed by Lidl. This proposal is suitable adjacent the A478 Narberth Road and will support much needed economic growth and a larger diverse retail food outlet that cannot be accommodated within Tenby and surrounding residential	New Hedges	Candidate Site 154		The amendment suggested is not supported by the Plan's evidence base.		The need for specialist and supported accommodation is identified in the 'Assessment of Specialist Housing and Accommodation Need for Older People in west Wales, November 2018 (See evidence base). The site allocation SSA/089/LDP2/01 East of Park House, Tenby formed part of a much larger Candidate Site (Ref 154) which was considered for a mix of housing, hospital expansion, hotel, food, retail/pub uses. The outcome of	No			

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							areas to support local residents. The area to the north of Garden Meadow Way to the extent of the boundary is suitable for complementary retail and/ or further residential development including affordable housing as a logical extension of the recent adjacent housing development (previously by Enzo Homes). The landowner supports the potential development opportunities offering a cohesive, comprehensive development plan for this specific area given the extent of previous development and continuing need that is deliverable.						the Candidate Site process was that part of the site was allocated for an extension to the existing residential/nursing home facility at Park House. It was found that the retail and commercial uses proposed through the Candidate Site process re not justified, with no need identified at the site. There has been no change in circumstances since to alter this conclusion.				
34583	M P Howe		1	DP SP 7 Settlement Boundaries	Object	No	Include Candidate Site 044 within the settlement boundary. A detailed submission is provided setting out the justifcation for inclusion.	Haverfordwest & Merlins Bridge	Candidate Site 044		The amendment suggested is not supported by the Plan's evidence base.		The representation site is on the eastern side of the Crow Hill Road, which is substantially undeveloped and forms an area designated as Amenity Open Space. It is of significant landscape value, as part of the steeply sloping river cliff rising from the Western Cleddau river. As the representor notes, there was a terrace of houses on the site, demolished in the 1950s and on which any former residential use was abandoned long ago. The presence of the remnants of basement walls is of no consequence in that regard as any residential use ceased several decades ago. More recently planning permission 07/1576/PA granted permission for access to	No			

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													woodland for forestry works and education, with a hardstanding and a woodland store. The permission was applied for by the representor and a condition on the permission says that the woodland hut shall not be used for any purposes other than in association with woodland management and related education, unless otherwise agreed by the LPA. There are also various conditions relating to the landscaping of the site. PCC has and will continue to support the use of the site for those purposes, but its replacement with a private dwelling, unrelated to the woodland management activities and facilitated by moving the LDP 2 Settlement Boundary is not supported. PCC will continue to defend the issues it has already raised in relation to landscape and open space at this location.				
34713	Mr Llewellyn		2	DP SP 7 Settlement Boundaries	Support	No	I support the inclusion of part of Candidate site 258 into the settlement of Burton. The site will offer a deliverable allocation once adopted and would be utilized at the earliest opportunity.	Burton	Candidate Site 258	Support welcomed. No change required.				No			

Representor Number	Representor	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
34758	Eglwyswrw C Council		5	DP SP 7 Settlement Boundaries	Comment	No comment	**Map 3 Site 040** - We have no observations to make on this site as we believe it does not change the current use of the site.	Postgwyn	Candidate Site Reference 040	Comment noted. No change required.				No			
34950	Mrs J H Collings		1	DP SP 7 Settlement Boundaries	Object		Field situated in East Willamston numbere 632 on ordnance survey . Land Registry WA857606 (Pentlepoir): A detailed statement is provided.	Pentlepoir	LDP2/Deposit2/New Site 7		The housing provision is set out in detail in the Plan to respond to the Plan's housing requirement and it is considered to be sufficient without the need to consider further housing sites.		The representor is seeking housing development. The site was not submitted as a Candidate Site. The land is to the south of Wooden and measures over half-hectare. It is outside of, and separated from the Settlement Boundary for Pentlepoir by a small caravan park. Development of the land for residential use would create a ribbon of development along the road, south of Wooden and not be well-related to the settlement of Pentlepoir-Wooden.	No			

4.0 Policy SP 08 Regional Growth Areas and Urban Settlements

Representor Number	Representor	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
4393	Welsh Government Place Division, Housing and Regeneration Directorate	Lichfields (4394)	5	DP SP 8 Regional Growth Areas and Urban Settlements	Support	Yes	Detailed submission of support provided.	Haverfordwest & Merlins Bridge	S/HSG/040/LDP2/6	Support welcomed. No change required.			2. Appendix 1 of the current Local Housing Market Assessment 2021 contained in the evidence base provides a breakdown of size of new accommodation required by each Community Council area in terms of bedroom size and tenure. Although paragraph 2.29 of the Local Housing Market Assessment 2021 comments on the greater proportion of larger homes (4 bedroomed properties or more) in Pembrokeshire this does not preclude their provision albeit the need for such properties may not be a significant as for smaller sized property. The Council is seeking to finalise the 2023 Local Housing Market Assessment with Welsh Government and hence that updated document is not available to refer to here (February 2025). It should be noted, however, that there is a restriction on the number of Housing Market Areas that can be identified under the Welsh Government's newest methodology which reduces the Council's ability to identify need more locally as it has been able to do with earlier versions of the Local Housing Market Assessment. The Financial Viability Report 2024 also includes reference to the dwelling mix adopted for viability testing at paragraph 4.19 which includes reference to 4 bed houses being included for both open market and affordable housing properties.				
1533	Home Builders Federation (Mark Harris)		12	DP SP 8 Regional Growth Areas and Urban Settlements	Object	No	The HBF considers it is not clear what this policy requires, it seem to say what will happen as a result of development rather than providing a framework in which to deliver development. We				The amendment suggested is not supported by the Plan's evidence base.		This is a strategy policy providing the framework for the Regional Growth Areas. General policies in the Plan provide greater detail in terms of directing and managing development to appropriate locations within the context of the strategy policy.	No			

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							also note most if not all of its aims are covered by other policies.										

4.0 Policy SP 09 Service Centres and Service Villages

Representor Number	Representor	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
4416	No name provided	Gethin Beynon Planning (4416)	1	DP SP 9 Service Centres and Service Villages	Object	No	West of Globe Inn 201(HSG/081/LDP2/1)whilst the allocation is welcomed, it is requested that the affordable housing requirement be reconsidered and brought in line with the usual affordable housing to open market proportion. A detailed submission is provided.	Maenclochog	HSG/081/ LDP2/1			The level of affordable housing requirement for this site will need to be re-evaluated in light of the consultation response.		Yes			FC5.GN16.Maenclohog.01

Representor Number	Representor	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
4346	A Yeandle	A. D. Architectural Design Consultants Ltd (4187)	1	DP SP 9 Service Centres and Service Villages	Object	No	1. It is immediately adjacent to the current LDP boundary. 2. Infills between the current site to the West and the A478 highway to the East. 3. Access could be from the site from the West, existing dwelling drive to the south or new access off the highway to the East. 4. Electric, water and mains sewer all easily accessible. 5. The site rounds of the northern section of the village. A site location plan is provided, a proposed block plan, and a sustainability appraisal.	Templeton	LDP2/ Deposit2/ New Site 25		The housing provision is set out in detail in the Plan to respond to the Plan's housing requirement and it is considered to be sufficient without the need to consider further housing sites.		This site was not considered through the Candidate Site process. A total of 9 Candidate Sites were considered at Templeton. Several of the sites were considered appropriate for residential development but not allocated nor included in the Settlement Boundary as sufficient land has been allocated under Policy GN 16 (Residential Allocations) of the Plan (ref. HSG/ 132/LDP2/1 West of Kings Park Farm). This representation presents additional land for residential development, but it is not required during the Plan period.	No			
4009	M Panton		1	DP SP 9 Service Centres and Service Villages	Support	Yes	**Policies: SP 9 References: CS138** Selected Features: Settlement_Monitoring_Reference:25, Settlement_Hierarchy_Position:Service Village,Settlement:Cosheston,Policy: SP 9,Housing_Market_Area_Band:2 Comments:I am in support of the settlement boundary for Cosheston as per SP9. **I support the EXCLUSION of the previous candidate site 143 as I agree that site CS138 fulfills the housing requirement for the village.**	Cosheston	Candidate Site 138 (025/00028) and Candidate site 143	Support welcomed. No change required.				No			
4409	Pembrokeshire Living Ltd	Lichfields (4409)	1	DP SP 9 Service Centres and Service Villages	Object	No	Detailed submission requesting the re-wording of Policy SP 9.				The amendment suggested is not supported by the Plan's		The latest published Local Housing Market Assessment would be the primary driver in considering housing requirements but may need to be informed by more local	No			

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											evidence base.		information available at the point of application, for example where a high requirement for one-bedroom flats may not recognise longer-term needs for the growth of households. Local community-based housing surveys can also assist. The current Local Housing Market Assessment 2021 contained in the evidence base provides a breakdown of size of new accommodation required by Community Council area in terms of bedroom size and tenure in Appendix 1. The Council is seeking to finalise the 2023 Local Housing Market Assessment with Welsh Government and hence that updated document is not available to refer to here (February 2025). It should be noted though that there is a restriction on the number of Housing Market Areas that can be identified under the Welsh Government's newest methodology which reduces the Council's ability to identify need more locally as it has been able to do with earlier versions of the Local Housing Market Assessment. In day-to-day development management decision-making, the Council relies on its Supplementary Planning Guidance 2015 to define local areas for the delivery of affordable housing. *Definition*				

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													of Local Area Consideration of information on need to support a new development 3.8 When assessing whether or not there is evidence of local need to support a development proposal for a new affordable home or homes, the Council will consider the "local area" to be a community council and its adjoining community councils for rural areas. Adjoining community councils exclude those community councils separated physically by the river Cleddau. The Towns (Haverfordwest, Milford Haven, Neyland, Fishguard and Goodwick,Narberth, Pembroke and Pembroke Dock) will be considered separately as self-sufficient areas. It is important that affordable homes are developed in those areas where there is an existing identified need in the local community. Where an individual is proposing a LCHO property for their own occupation, demonstrating a connection with Pembrokeshire will be considered sufficient demonstration of local need. In conclusion, a flexibility of approach is needed so the site in question is considered usually within the context of information available for the community council area in				

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													which it is sited and neighbouring community council areas, but bearing in mind needs at a Pembrokeshire level for example for LCHOs or perhaps a strategic need for specialist housing is considered. The approach in Policy SP9 is considered appropriate as it allows for flexibility of interpretation when read alongside other policies of the Plan and supporting guidance which provide more advice on how need is considered.				
1470	Mathry Community Council		2	DP SP 9 Service Centres and Service Villages	Object	No comment	The Council proposes that Mathry be downgraded from its designation as a Service Village which the LDP2 defines as: "Each village offers a good provision of services and facilities to meet the day to day needs of their population". This is no longer true for Mathry – in recent years it has lost its school, its post office, its café and its shops and now has only the pub and the community hall as a community facility. It clearly can no longer meet the day to day needs of its population.	Mathry			The amendment suggested is not supported by the Plan's evidence base.		The representor has asked for Mathry to have its Service Village categorisation in the Settlement Hierarchy reviewed. The lack of a school, a permanent \post Office, a café and a shop are cited as reasons for this. Having checked the Rural Facilities Report, 2020, with minor updates to July 2024, it is evident that these matters had already been recognised - and that the village still scored sufficiently to justify Service Village designation. For that reason, no change is proposed. However, to note that this village has one modestly sized housing commitment and no residential allocation under LDP 2, Deposit Plan 2.	No			

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4322	Mrs A Phillips		2	DP SP 9 Service Centres and Service Villages	Object	No	See Representation 1.	Square & Compass	LDP2/ Deposit2/ New Site 5		The amendment suggested is not supported by the Plan's evidence base.		Square and Compass is classified as a Service Village by LDP 2, Deposit Plan 2's Settlement Hierarchy. Many Service Villages are given a LDP 2, Deposit Plan 2 residential allocation. However, in this case, there were no Candidate Sites submitted for the settlement and hence it did not get a residential allocation under policy GN 16. During the Deposit Plan 2 consultation, a representation was received proposing an Alternative Site for residential use, adjoining the Square and Compass Settlement Boundary. This is a section of an agricultural field adjoining the Settlement Boundary, with one further side defined by a road, but the remaining two being undefined within the field. This submission has come late in the LDP 2 plan preparation process, the site has therefore not been constraints checked through the Candidate Site assessment process and it has not been accompanied by a Sustainability Appraisal. Part of the broader context for considering future planning in this particular settlement is also that it is a a split settlement, with part located within and part outside the Pembrokeshire Coast National Park. The National Park element of the settlement has	No			

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													two rounding off opportunities within a settlement boundary that are expected to provide 7 and 10 dwellings respectively, although noting that there has been no progress towards delivery to date on either. Looking at broader issues, PCC has already identified sufficient land at Service Village level across its Plan area and the introduction of this further site would risk over-providing against the plan's strategy in that respect. PCC is also concerned that introducing a completely new site to a rural settlement at this late stage in the process would not be ideal, as there has been no prior community consultation. As such, PCC would suggest that the best way forward is not to allocate this site through LDP 2 or place it in the Square and Compass Settlement Boundary, but rather to await the next Plan review, at which point it could be put forward for consideration through the Candidate Site process and be properly tested throughout the Plan process.				
4416	No name provided	Gethin Beynon Planning (4416)	3	DP SP 9 Service Centres and Service Villages	Object	No	West of Globe Inn 201(HSG/081/LDP2/1)whilst the allocation is welcomed, it is requested that the affordable housing requirement be reconsidered and brought in line with the usual affordable housing to open market proportion. A detailed submission is provided.	Maenclochog	HSG/081/ LDP2/1			The level of affordable housing requirement for this site will need to be re-evaluated in light of the		Yes			FC5.GN16.Maenclohog.01

Representor Number	Representor	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
												consultation response.					
4377	Ateb	Stantec(4376)	5	DP SP 9 Service Centres and Service Villages	Support	No comment	Policy SP9 Service Centres and Service Villages supports development in these critical settlements, we are supportive of the aspirations of this policy and have accounted for these requirements as part of the emerging masterplanning exercise. The proposal, which is appended to these representations is of a scale and nature that is appropriate to the settlement and commensurate with the rate of growth seen to date. The tenure mix, to be discussed within this report, has been based on the assessment carried out by PCC and is deemed to be most appropriate for Letterston. The open space proposed will be accessible and serve all residents of the local community.	Letterston	HSG/053/ LDP2/1.	Support welcomed. No change required.				No			
4377	Ateb	Stantec(4376)	8	DP SP 9 Service Centres and Service Villages	Support	No comment	Our Site is well positioned to adapt to his potentially dynamic housing mix within the Plan period by utilising the short, medium and longer-term delivery timescales of both this land and the neighbouring Phase 2 land. More detail is provided in the detailed submission.	Letterston	HSG/053/ LDP2/1.	Support welcomed. No change required.				No			
4377	Ateb	Stantec(4376)	13	DP SP 9 Service Centres and Service Villages	Support	No comment	We support the draft Policy GN 43 Protection of Trees, Woodlands and Hedgerows and have aimed to maximise retention, protection and integration of existing trees, woodlands and hedgerows through the emerging concept plan. The frontage to Station Road, which is lined with an earthen bank (which could be removed to allow for the footpath extension) and a hedgerow	Letterston	HSG/053/ LDP2/1.	Support welcomed. No change required.				No			

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							(which will broadly be retained subject to dwelling pedestrian access). Vehicular access will pass through the Phase 2 site and Longstone Court, a solution that would be more sensitive to the existing green infrastructure. The emerging concept plan for the Site also shows a large area of public open green space, with retained hedgerows along the southern and eastern boundaries.										
1533	Home Builders Federation (Mark Harris)		13	DP SP 9 Service Centres and Service Villages	Object	No	The policy states 1. Development is of a scale and nature identified as being appropriate for the settlement; The HBF question the phrase 'Being appropriate' and ask how, when and by whom will this decision be made? The wording creates a level of uncertainty which will make it more difficult for developers to bring schemes forward. HBF suggests this is reworded or additional explanatory text is provided					The amendment suggested is already addressed by the Plan. No change is needed.		Policy SP9 Service Centres and Service Villages alongside the Insets for these Centres and Villages provides an explanation and visual representation regarding the scale and nature of growth envisaged. The Plan should also be read as a whole and other policies of the Plan including the site-specific allocation policies and criteria-based policies will provide the framework for considering proposals coming forward. The Council also intends to bring forward a Development Sites and Infrastructure Supplementary Planning Guidance which will be consulted upon.	No			

4.0 Policy SP 10 Local Villages

Representor Number	Representor Name	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC)
1894	South Meadow Homes	G Thomas (1536)	1	DP SP 10 Local Villages	Object	No	**BARNLAKE – SETTLEMENT STATUS** Barnlake is a modern satellite residential settlement being created as part of the comprehensive brown field redevelopment at Westfield Pill. This consolidates the attractive sheltered estuary frontage from Burton Ferry to Llanstadwell. Barnlake so far comprises approximately 24 dwellings mainly created by Phase One of the brown field redevelopment with a further 22 consented homes to be built in Phase Two. Barnlake is served by a Junction with the A477 which is also a principle cycle route, footpath and bus route. It is more accessible to the urban facilities of Pembroke Dock than many of that Service Centre's own suburbs. Barnlake is not rural in character. It does not rely on other small nearby settlements to provide its essential services. Once the planned brown field redevelopment is finished Barnlake will have little or no opportunity for any additional development. At that point the "local village" or equivalent designation could be appropriate for Development Management purposes. Our concern is that if during the delivery of the last 22 homes (Phase 2) any design changes are identified, the local village settlement designation and policy could preclude normal consideration of any proposal. For example if we wished to assist self – builders by way of substituting house types or adjusting levels. PROPOSAL – A supplementary paragraph be added to S.P 10 'LOCAL VILLAGES' to accommodate our concern and give clarity for future Development Management purposes. **Satellite picture, neighbouring centres map, layout plan, water mains and pumping station map, included in the representation.**	Barnlake			This is a matter that is best addressed at a detailed planning application stage.		Certificate of lawful development reference 24/0651/CL has confirmed the lawful commencement of outline planning permission 18/0219/PA and reserved matters 18/0511/PA. This would provide a potential fallback position for a subsequent section 73 variation of condition applications to consider on its merits for the issues raised by the representation. The policy regime concerning Local Villages has changed since this site was granted planning permission and it would not be appropriate to make a specific exception for this site or indeed an other extant consent for sites of 5 units or more, as this would undermine the policy when determining applications for any new site of 5 or more units.	No			

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34713	Mr Llewellyn		3	DP SP 10 Local Villages	Support	No	I support the inclusion of part of Candidate site 258 into the settlement of Burton. The site will offer a deliverable allocation once adopted and would be utilized at the earliest opportunity.	Burton	Candidate Site 258	Support welcomed. No change required.				No			
34728	M & Mrs Doward		1	DP SP 10 Local Villages	Support	Yes	Site adjacent to the Old Post Office, Ambleston. Supporting information for the site provided. See detailed submission.	Ambleston	Candidate Site 287	Support welcomed. No change required.				No			
4330	Mr N Sime		1	DP SP 10 Local Villages	Object	No	Would like to see settlement boundary extended to accomodate sheds to SE of Treffynnon Chapel . **Map** provided showing red outline of the site proposed for inclusion.	Treffynnon	LDP2/Deposit2/New Site 2		The amendment suggested is contrary to National Planning Policy and/or Guidance.		This proposal seeks the inclusion of a number of agricultural sheds within the Treffynnon Settlement Boundary. Treffynnon is a Local Village and the site identified is of unspecified but substantial size. It was not proposed as an LDP 2 Candidate Site and there is no Sustainability Appraisal to accompany the Alternative Site. While acknowledging that the site mostly comprises disused agricultural sheds and the spaces between them – and that it is proximate to the village – its inclusion within the Treffynnon Settlement Boundary would result in a scale of development disproportionate for a village of this scale and in this position in the LDP 2 Settlement Hierarchy. Hence, no change to the Plan is proposed.	No			

Representor Number	Representor Name	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) :.
4333	S Noott		1	DP SP 10 Local Villages	Comment	Yes	The amendment I am requesting pertains to the settlement boundary of Wolfsdale, which directly surrounds my property (Wolfsdale Hall - SA62 6JJ). When I purchased the property in 2009, the garden was a small area to the rear of the property. The current settlement boundary borders this rear garden. I expanded the gardens for the enjoyment of my family shortly after moving in. In August 2024, Pembrokeshire County Council issued a certificate of lawful use (attached below) that clarified the distinction between agricultural land and residential gardens The current Local Development Plan (LDP1) settlement boundary, which is proposed to be repeated in LDP2, does not recognise that the garden area extends beyond the settlement boundary. There are clearly defined boundary features on the ground (in the form of embankments) that the proposed settlement boundary disregards. Therefore, it would appear logical to amend the settlement boundary to acknowledge this and include the entire garden area within the settlement boundary. This would represent a logical conclusion of the existing settlement and provide clarity over the distinction between agricultural land and residential gardens. The map on the final page of the certificate of lawful use displays the proposed area, designated as residential garden, to be included within the LDP2 settlement boundary of Wolfsdale.	Wolfsdale	LDP2/Deposit2/New Site 24		The amendment suggested is contrary to National Planning Policy and/or Guidance.		The situation regarding the Certificate of Lawful Use is understood and accepted. However, extending the Settlement Boundary at Wolfsdale to reflect that decision is not considered to be appropriate. Wolfsdale is classified as a Local Village in the LDP 2, Deposit Plan 2 Settlement Hierarchy. As such, it is a village where limited service provision makes it inappropriate for significant levels of development during the Plan period. Accordingly, there are no residential allocations made in such villages. However, there may be small-scale windfall housing opportunities available in some such villages, within the Local Village Settlement Boundaries - as paragraph 4.53 of the Plan explains, this will typically be for 1 to 2 plots for general market or affordable housing. Extending the Wolfsdale Settlement Boundary to take in the additional garden area relating to the Certificate of Lawful Use consent would potentially provide an opportunity to build out a substantial residential estate, which would result in a scale of development disproportionate to a village of this size and nature. Leaving parts of very large garden curtilage areas	No			

Representor Number	Representor Name	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC)
													outside Settlement Boundaries is a matter addressed in the Settlement Boundary Methodology background paper of November 2019, paragraphs 4.3 and 4.4. Whilst in this case there is no prospect of coalescence of settlements involved, a potential for over-development is apparent and for that reason no change is proposed to the Plan.				
4326	Mr M Bell		3	DP SP 10 Local Villages	Object	No	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. Detailed reasoning is provided in the original representation: questioning the meaning of the term 'a functional link', 'the term'well related to' and the use of reference to 'satellite settlement'. 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.				The amendment suggested is not supported by the Plan's evidence base.		There is a Cluster Settlements Paper to support LDP 2, which was updated in December 2020 that provides the rationale behind the concept. It forms a supplementary paper to that on Strategic Housing Options. The Cluster Settlement Paper explains that Cluster Local Villages seek to address rurality, sustain communities and create strong and distinctive communities. It reflects PCCs preparation of a planning policy framework that is appropriate for the particular circumstances of its area of planning jurisdiction. In this particular case, a need to present a slightly more flexible approach in certain Local Villages explains why the concept of 'Cluster Local Villages' is incorporated into the planning policy framework. Paragraph 4.54 of LDP 2, Deposit Plan 2, explains that in the 24 Cluster Local Villages,	No			

Representor Number	Representor Name	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC)
													small- scale residential development will be permitted within settlement boundaries - the sites concerned will be capable of delivering between 1 and 5 dwellings, with larger sites not being supported and cumulative impacts of such proposals also being a consideration. The difference in planning policy approach between Cluster Local Villages and other Local Villages is that it is modest in its potential impacts.				

4.0 Policy SP 11 Countryside

Representor Number	Representor Name	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
34450	Natural Resources Wales		7	DP SP 11 Countryside	Support	No comment	We support the recognition of the wider benefits of natural and semi-natural environments.			Support welcomed. No change required.				No			
34485	Pembrokeshire Coast National Park Authority		6	DP SP 11 Countryside	Comment	No comment	Countryside: SP 11 Countryside: The PCNPA's LDP also identifies the following developments may be permitted in the countryside (PCNPA's policy 7) affordable housing exception site (criterion i); to help communities adapt and relocated due to coastal change (criteria j&k); Gypsy and Traveller site (criterion l) and renewable energy proposals (criterion m).			Comment noted. No change required.				No			
34485	Pembrokeshire Coast National Park Authority		8	DP SP 11 Countryside	Support	No comment	SP 11 Countryside: Both plans recognise the importance of agriculture and agricultural support industries to Pembrokeshire and the need to support appropriate rural diversification. As stated above, the NP's LDP identifies a number of exception development that isn't reflected in PCC's policy. Support SP 11 Countryside criterion 3) diversification and criterion 4) The re-use and conversion of appropriate existing buildings.			Support welcomed. No change required.				No			

4.0 Policy SP 12 Maintaining and Enhancing the Natural Environment

Representor Number	Representor	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit	Other Edit No.	See Focussed Change (FC) No.
2603	Dwr Cymru		1	DP SP 12 Maintaining and Enhancing the Natural Environment	Support	No comment	**SP12 Maintaining and Enhancing the Natural Environment** We welcome the requirement within the policy that all development will be required to protect water quality. We provide further comment on this matter in policy GN 47.			Support welcomed. No change required.				No			
4387	PRL Partnership	Lichfield (4409)	3	DP SP 12 Maintaining and Enhancing the Natural Environment	Object	No	A detailed submission is provided regarding the tests of soundness and an amended policy wording is proposed.					Agree in part.	A focussed change is proposed to ensure the policy is in conformity with National Planning Policy.				**FC4.SP12.02**
4388	Haven Leisure Ltd	Lichfields (4409)	3	DP SP 12 Maintaining and Enhancing the Natural Environment	Object	No	A detailed submission is provided regarding the tests of soundness and an amended policy wording is proposed.					Agree in part.	A focussed change is proposed to ensure the policy is in conformity with National Planning Policy.				**FC4.SP12.02**
4393	Welsh Government Place Division, Housing and Regeneration Directorate	Lichfields (4394)	6	DP SP 12 Maintaining and Enhancing the Natural Environment	Object	No	Detailed submission provided requesting the re-wording of the Policy					Agree in part.	A focussed change is proposed to ensure the policy is in conformity with National Planning Policy.				**FC4.SP12.02**
4409	Pembrokeshire Living Ltd	Lichfields (4409)	6	DP SP 12 Maintaining and Enhancing the Natural Environment	Object	No	Detailed submission requesting the re-wording of Policy SP 12.					Agree in part.	A focussed change is proposed to ensure the policy is in conformity with National Planning Policy.				**FC4.SP12.02**

4.0 Policy SP 13 Port and Energy Related Development and Celtic Freeport

Representor Number	Representor	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
4420	RWE Generation UK	RPS (4419)	1	DP SP 13 Port and Energy Related Development and Celtic Freeport	Object	No	The County Council will be aware of RWE's Pembrokeshire Net Zero Initiative (https://uk.rwe.com/innovation/pembroke-net-zero-centre-pnzc/) which contains a number of future renewable energy proposals for the Pembroke Power Station site that will come forward in the Plan Period. The 'Port and Energy Related Development and Celtic Freeport' policy SP13 boundary as currently proposed is insufficient in its extent for reasons as set out herein: The spatial extent of the boundary as illustrated on the draft Proposals Map does not relate to the full extent of RWE's landholding at Pembroke Power Station, omitting a substantial part of the estate to the west and south of the Power Station. Ensuring that the policy boundary is contiguous with the Power Station estate boundary is an important consideration so that future energy schemes that are 'energy related development' are in line with and not contra this highly relevant Development Plan policy that offers support in principle (subject to criteria) for such proposals. Secondly, by extending the policy boundary of the above to be contiguous with RWE's landholding, will also enable land earmarked for the Celtic Freeport to be included within the designation. Given the above, we duly request that the boundary for 'Port and Energy Related Development and Celtic Freeport' in the vicinity of Pembroke Power Station is amended to align with the redline boundary plans submitted in support of this consultation representation.	Proposal Map & Inset Map Key	S/EMP/095/00001 & LDP2/Deposit2/ New Site 32	Agree focussed change needed.			Policy SP 13 on Port and Energy Related Development and Celtic Freeport supports development proposals for appropriate industrial and port-related facilities, including infrastructure, at the Ports of Milford Haven and Fishguard and within the Haven Waterway Enterprise Zone, subject to those proposals demonstrating that they respect and protect the landscape, natural and built environment. A spatial area is defined within which the policy applies. This representation asks for the spatial area to be amended to take in additional land within RWE ownership at Pembroke Power Station, reflecting the emerging Celtic Freeport proposals. The area proposed for inclusion lies primarily to the south of that referenced on the LDP 2, Deposit Plan 2 Proposals Map. Given that there are necessary safeguards already built into the policy framework of LDP 2 and that this boundary modification could help facilitate Celtic Freeport proposals, the proposed change is agreed.				FC4.SP13.02

Representor Number	Representor	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
34485	Pembrokeshire Coast National Park Authority		9	DP SP 13 Port and Energy Related Development and Celtic Freeport	Support	No comment	Support: It is noted that with regard to Policy SP 13 Port and Energy Related Development the National Park Authority suggested at Preferred Strategy Stage that the reference to excluding wind energy generation would provide clearer advice if inserted in the policy text. This has been done and this is supported. The intention to prepare Supplementary Planning Guidance to support the designation of the Celtic Freeport is welcomed.			Support welcomed. No change required.							
1507	Welsh Government		11	DP SP 13 Port and Energy Related Development and Celtic Freeport	Comment	No comment	**Haven Waterway Enterprise Zone** The Haven Waterway Enterprise Zone in Pembrokeshire has been designated by the Welsh Government based on existing and potential new energy sites. The importance of the Enterprise Zone and Celtic Freeport are recognised by the authority through Policy SP13 Port and Energy Related Development. Given its importance the boundaries of the Enterprise Zone (plus potentially the Celtic Freeport) must be shown on the Proposals Map. **The Welsh Government is content that previous representations appear to have been addressed, although further clarification that all spatial areas to which policy SP13 apply are identified, thereby ensuring the plan is compliant with the DPM and national planning policy would be beneficial.**			Comment noted. No change required.			To note that the Port and Energy Related Development Policy SP 13 has a defined spatial area and that while this has synergies with the Enterprise Zone spatial area and (as far as currently known) Freeport tax sites, it is not identical to these. It may be necessary to modify the Plan to show the Freeport tax sites and customs sites on the Proposals Map later in the process. We were reluctant to show the Enterprise Zone spatial area on the Proposals Map because not all land within the boundary had been environmentally assessed.				
1533	Home Builders Federation (Mark Harris)		14	DP SP 13 Port and Energy Related Development and Celtic Freeport	Object	No	The HBF suggests that the supporting text should include some commentary relating to the impact of this development opportunity on the need for new homes linked to the new jobs to be created, both during the construction stage and once the new jobs are created.			Agree focussed change needed.			It is agreed that further text should be added to the reasoned justification to policy SP 13, to reference the link between the emerging Celtic Freeport proposals and future accommodation needs. However, given that Celtic Freeport is in its infancy, these are likely to be matters that will to a greater				FC4.SP13.01

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													extent require consideration under successor Plans and in the context provided by Future Wales - the National Plan 2040.				

4.0 Policy SP 14 Strategic Employment Provision

Representor Number	Representor Name	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
2603	Dwr Cymru		84	DP SP 14 Strategic Employment Provision	Comment	No comment	**S/EMP/086.LDP/01 Blackbridge** The site is crossed by a 6" diameter watermain. No sewers crossing the site. Site is in the catchment area of Milford Haven WwTW	Countryside	S/EMP/086/LDP/01	Comment noted. No change required.				No			
2603	Dwr Cymru		85	DP SP 14 Strategic Employment Provision	Comment	No comment	**S/EMP/136/00001 Former RNAD Site, Trecwn** There are no watermains near the site. There are no public sewers near the site. N/a	Countryside	S/EMP/136/00001	Comment noted. No change required.			Future employment proposals would need to address the water supply and drainage issues identified.	No			
2603	Dwr Cymru		86	DP SP 14 Strategic Employment Provision	Comment	No comment	**S/EMP/034/LDP/02 Goodwick, Parrog** The site is crossed by a 160mm diameter watermain. The site is crossed by 100mm and 900mm diameter sewers, a 400mm pressurised rising main sewer, and a Sewage Pumping Station (SPS) is located on the site Site is in the catchment area of Fishguard WwTW.	Countryside	S/EMP/034/LDP/02	Comment noted. No change required.			A water main, two sewers and a pressurised rising main sewer (connecting to Fishguard WwTW) cross the site and that there is also a sewage pumping station within the site boundary. The presence of these features will need to be taken into consideration in designing the layout for the site and can be included in the Development Sites and Infrastructure SPG.	No			

Representor Number	Representor Name	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
2603	Dwr Cymru		87	DP SP 14 Strategic Employment Provision	Comment	No comment	**S/EMP/040/00004 Withybush Cluster (Trading Estate)** No watermains crossing the site. The site is crossed by a 225mm diameter sewer. Site is in the catchment area of Merlin's Bridge WwTW.	Countryside	S/EMP/040/00004	Comment noted. No change required.			To note that a sewer crosses the site. The expectation is that this site would be connected to the Haverfordwest sewerage system, which drains to Merlins Bridge WwTW. This information can be included in the Development Sites and Infrastructure SPG.	No			
2603	Dwr Cymru		88	DP SP 14 Strategic Employment Provision	Comment	No comment	**S/EMP/040/00005 Withybush Cluster (East of Lodge Estate)** No watermains crossing the site. No sewers crossing the site. Site is in the catchment area of Merlin's Bridge WwTW.	Countryside	S/EMP/040/00005	Comment noted. No change required.			To note that the expectation is that this site would be connected to the Haverfordwest sewerage system, which drains to Merlins Bridge WwTW.	No			
2603	Dwr Cymru		89	DP SP 14 Strategic Employment Provision	Comment	No comment	**S/EMP/040/00001 Withybush Cluster (West Estate)** The site is crossed by a 6" diameter watermain. The site is crossed by a 150mm diameter sewer. Site is in the catchment area of Merlin's Bridge WwTW.	Countryside	S/EMP/040/00001	Comment noted. No change required.			To note that a water main and sewer cross the site, which will need to be taken into consideration in designing the layout for the site. The expectation is that this site would be connected to the Haverfordwest sewerage system, which drains to Merlins Bridge WwTW. This information can be included in the Development Sites and Infrastructure SPG.	No			
4386	Day's Property Holdings Limited	Agent Montagu Evans LLP(4244)	1	DP SP 14 Strategic Employment Provision	Support	No comment	Employment,UseClasses:B1,AreaHa:20.75,StrategicEmploymentClusterReference:S/EMP/040/C1,Policy:SP 14,Site_Name:Withybush cluster (West Estate),LDP2_Reference:S/EMP/040/00001 Comments:See Cover Letter A detailed submission is provided	Haverfordwest Withybush Road	StrategicEmploymentClusterReference:S/EMP/040/C1, Policy:SP 14,Site_Name:Withybush cluster (West	Support welcomed. No change required.				No			

Representor Number	Representor Name	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
							describing the site and surrounding area, the planning history of the site, how the site is designated in the current LDP 1 and the forthcoming LDP 2, the proposal the respondents wish to progress (including a proposed layout). **The intended inclusion of the Site within the forthcoming allocation is seen as a positive. Day's remain keen to develop land within their ownership largely for the purposes as set out in the 2022 pre application submission.**		Estate),LDP2_Reference:S/EMP/040/00001							
4386	Day's Property Holdings Limited	Agent Montagu Evans LLP(4244)	2	DP SP 14 Strategic Employment Provision	Object	No	Notwithstanding the above, interest has also been expressed by operators commonly found in industrial / employment locations throughout the UK falling **within a Sui Generis use class.** It is therefore considered that the forthcoming allocation, while primarily focussing on Class B2 / B8 uses should also reference appropriate Sui Generis uses typically found in "employment" areas in order to avoid unnecessary delays in the determination of applications seeking the positive asset management of Day's landholding. The approval of an EV charging hub at the Site (Sui Generis use) as part of a wider development serves as an example of such an appropriate use.	Haverfordwest Withybush Road	StrategicEmploymentClusterReference:S/EMP/040/C1, Policy:SP 14,Site_Name:Withybush cluster (West Estate),LDP2_Reference:S/EMP/040/00001		The amendment suggested is already addressed by the Plan,. No change is needed.		The representation indicates that the Strategic Employment Provision at S/EMP/040/00001 references B2 and B8 uses and is asking for Sui Generis uses to also be included. In fact, the reference in relation to this site is to B1 uses. However, there is a caveat in the policy wording which says that 'The use classes specified for each site will be allowed, together with other uses closely related to the main employment use. Where B2 uses are proposed, these must not cause significant adverse amenity impacts on nearby land uses'. It is therefore suggested that a Sui Generis use closely related to the main employment use would be acceptable under the terms of policy SP 14. However, there would be a need to demonstrate that any Sui Generis use proposed was closely related to the main employment use, to prevent a proliferation of non-employment uses poorly related or unrelated to the employment focus on the site.	No			

Representor Number	Representor Name	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
2603	Dwr Cymru		2	DP SP 14 Strategic Employment Provision	Comment	No comment	**SP14 Strategic Employment Provision** The following provisions are applicable to all individual development plots located within allocated employment sites: • Potential developers should be aware that the obligation of a water and sewerage undertaker extends to 'domestic' supplies only. Where an employment allocation results in higher demands of water supply and/or trade effluent discharges we recommend and welcome early consultation with Welsh Water. • If any development site gives rise to a new discharge (or alters an existing discharge) of trade effluent, directly or indirectly to the public sewerage system, then a Discharge Consent under Section 118 of the Water Industry Act 1991 is required from Welsh Water. Please note that the issuing of a discharge consent is independent of the planning process and a consent may be refused despite planning permission being granted. • The individual plots available for development can represent a substantial area of land for which the potential demands upon our assets are unknown at present. It is essential that we understand these demands to allow us to assess the impact on our assets. It may be necessary for water and/or sewerage hydraulic modelling assessments (HMAs) to be undertaken at the developer's expense to establish where the proposed development could connect to the			Comment noted. No change required.				No			

Representor Number	Representor Name	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
							existing networks, and to identify any required infrastructure improvements. • Water mains and/or sewerage infrastructure required for any potential development site can be acquired through the requisition provisions of the Water Industry Act 1991 (as amended). • Welsh Water always has rights of access to its assets. Where there are water mains and/or sewers crossing sites then protection measures in respect of these assets will be required, usually in the form of an easement width or in some instances a diversion of the asset. Information is provided in the appendix to advise if there are assets crossing the allocated sites and to identify the Wastewater Treatment Works Catchment that the sites are located within.										
34450	Natural Resources Wales		8	DP SP 14 Strategic Employment Provision	Support	No comment	**SP 14 - Strategic Employment Provision** We are pleased to note that biodiversity will be safeguarded on identified employment sites and also as specified in 4.91 and 4.97 our advice on connections to foul sewer at Withybush and the requirement for Habitats Regulations Assessment (HRA) on sites with potential impact to the Marine Special Areas of Conservation (SAC) has been included.			Support welcomed. No change required.				No			

4.0 Policy SP 16 Retail Hierarchy

Representor Number	Representor	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
34485	Pembrokeshire Coast National Park Authority		10	DP SP 16 Retail Hierarchy	Support	No comment	SP 16 Retail Hierarchy: Both Authorities' strategies focus on the need to maintain / create vibrant and diverse town, district and local centres, seeking to protect the established retail hierarchy. Both plans recognise the need for mixed uses, with, for example, residential provision above ground floors. Both Plan's retail hierarchies are compatible and based on the findings of the South West Wales Regional Retail Study (February 2017) which identified no need for additional convenience retail floorspace. Support SP 16 Retail Hierarchy (and GN 31 Town Centre and Local Retail Development.)			Support welcomed. No change required.				No			
34485	Pembrokeshire Coast National Park Authority		38	DP SP 16 Retail Hierarchy	Comment	No comment	Strategic Policy SP 16 – Retail Hierarchy SA Objective 7 – Assessing impacts on Welsh Language is difficult but we feel that the fact the policy says "vibrancy, vitality and attractiveness of that centre, supporting the delivery of appropriate comparison and convenience retail, office, leisure, entertainment, cultural and community facilities", provides a reasonable amount of certainty here that the impact may be positive. A large part of this policy seems to be around community building. Suggest a bit of a rewording here, assessment could be more positive.			Agree other edit needed				Yes		OE5	

4.0 Policy SP 17 Visitor Economy

Representor Number	Representor	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
4387	PRL Partnership	Lichfield (4409)	8	DP SP 17 Visitor Economy	Object	No	Tests of soundness: 1 and 3 The emerging policy in its current form provides a somewhat supportive framework for proposals related to the visitor economy. Whilst PRL Partnership agrees that tourism can be a catalyst for regeneration, its importance can be considerably more than that and Policy SP17 should be clarified to avoid any misunderstanding that relates only to regeneration-based development proposals and also to ensure consistency with PPW which states that "In rural areas, tourism-related development is an essential element in providing for a healthy and diverse economy." Development of the whole visitor economy should be reinforced. The emerging policy should also support the diversity or improved quality, but not necessarily require development to deliver a diversity of provision as part of each individual proposal – in some cases, it is more appropriate for a single type of accommodation to be provided. There are sufficient general development management policies that seek to protect, conserve, and/or enhance the natural and built environments elsewhere in the emerging Plan. There is no need to include this in the strategic policy for the visitor economy. Accordingly, draft policy SP 17 should be amended to: "Proposals for development relating to the visitor economy will be supported provided that they are in an appropriate location, contribute to the diversity and quality of accommodation and attractions across Pembrokeshire".			Agree focussed change needed.				Yes			FC4.SP17.01
4388	Haven Leisure Ltd	Lichfields (4409)	9	DP SP 17 Visitor Economy	Object	No	Tests of soundness: 1 and 3 The emerging policy in its current form provides a somewhat supportive framework for proposals related to the visitor economy. Whilst Haven Leisure Ltd agrees that tourism can be a catalyst for regeneration, its importance can be considerably more than that and Policy SP17 should be clarified to avoid any misunderstanding that relates only to regeneration-based development proposals and also to ensure consistency with PPW which states that "In rural areas, tourism-related development is an essential element in providing			Agree focussed change needed.				Yes			FC4.SP17.01

Representor Number	Representor	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
							for a healthy and diverse economy." Development of the whole visitor economy should be reinforced. The emerging policy should also support the diversity or improved quality, but not necessarily require development to deliver a diversity of provision as part of each individual proposal – in some cases, it is more appropriate for a single type of accommodation to be provided. There are sufficient general development management policies that seek to protect, conserve, and/or enhance the natural and built environments elsewhere in the emerging Plan. There is no need to include this in the strategic policy for the visitor economy. Accordingly, draft policy SP 17 should be amended to: "Proposals for development relating to the visitor economy will be supported provided that they are in an appropriate location, contribute to the diversity and quality of accommodation and attractions across Pembrokeshire".								
34485	Pembrokeshire Coast National Park Authority		11	DP SP 17 Visitor Economy	Support	No comment	SP 17 Visitor Economy: Both Authorities recognise the importance of the visitor economy to Pembrokeshire's economy and aim to support the visitor economy and to attract visitors all year round in appropriate locations. Recognition is given by both Authorities to the attraction of the quality of the natural environment and the need for its protection. Between them the Plan strategies will allow for a range of visitor accommodation. Support SP 17 Visitor Economy (and GN 54 Visitor Attractions and Leisure Facilities, GN 55 Service and Hotel Accommodation GN 56 Caravan, Camping and Chalet Development (see separate comment), and GN 57 Site Facilities)			Support welcomed. No change required.				No			

4.0 Policy SP 18 Non-Energy Minerals

Representor Number	Representor Name	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
34485	Pembrokeshire Coast National Park Authority		12	DP SP 18 Non-Energy Minerals	Support	No comment	SP 18 Non-Energy Minerals: Both Authorities are within the West Wales sub-region with the apportionment of sand and gravel needing to be considered on a sub-regional basis. Both Authorities recognise the need to find new sources of sand and gravel outside the National Park and the allocation for a sand and gravel quarry to contribute to the sub-regional need is welcomed. Support SP 18 Non-Energy Minerals			Support welcomed. No change required.				No			

4.0 Policy SP 19 Welsh Language

Representor Number	Representor	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
4393	Welsh Government Place Division, Housing and Regeneration Directorate	Lichfields (4394)	7	DP SP 19 Welsh Language	Object	No	Soundness Test 3 This policy requires the preparation of a Welsh Language Impact Assessment "setting out how a proposed development will protect, promote and enhance the Welsh Language" for "windfall residential development of 5 or more dwellings; retail, commercial or industrial developments with a total floorspace of 1000sqm or more or a site area measuring more than 1 hectare" in areas of Welsh language sensitivity, as identified on the Proposals Map. Whilst we do not object to this requirement, we note that neither the proposals map nor the interactive constraints map include any designation for areas of Welsh language sensitivity. At present, this policy fails Soundness Test 3 as it cannot be implemented.			Agree focussed change needed.			The Welsh Language-Sensitive Area is shown within the text of LDP2. The Proposals Map will be amended to show the area of application.	Yes			FC4. SP19.0
34485	Pembrokeshire Coast National Park Authority		13	DP SP 19 Welsh Language	Support	No comment	SP 19 Welsh Language: The Welsh language which continues to be an important component in the social, cultural and economic life of many communities in the County will be protected and supported by managing development sensitively in areas where it has a significant role in the community. Both Authorities have defined the scale of the development to which the policy would apply and in communities to reflect the Pembrokeshire average of Welsh speakers, noting the County Council's figures represent a more up to date percentage of Welsh speakers. This is considered to be a consistent approach in both Local Development Plans.Support SP 19 Welsh Language, GN1 General Development Policy. Similar approach taken.			Support welcomed. No change required.				No			

Representor Number	Representor	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
1507	Welsh Government		14	DP SP 19 Welsh Language	Comment	No comment	**Welsh Language Impacts** Policy SP19 identifies areas of Welsh language sensitivity where 18% or more of the population is Welsh speaking. The authority should explain how the scale of housing growth proposed in the plan does not adversely impact on the Welsh Language.			Comment noted. No change required.			The Welsh Language Background Paper sets out in detail how consideration is given to ensuring that residential allocations within the identified Welsh language-sensitive area contribute to protecting the Welsh language within those communities. There are 13 allocated sites within the Welsh language-sensitive area and detailed comments are provided for each site to demonstrate that the number of houses allocated, affordable housing provision and phasing of delivery supports the use of the Welsh language. Proposals for speculative (windfall) development which is more than minor in scale (5 or more dwellings; floorspace of at least 1,000sqm; site area of more than 1ha) within the Welsh-language-sensitive area will be subject to a Welsh Language Impact Assessment, as set out in Policy SP 19 (Welsh Language).	No			

4.0 Policy SP 21 Waste Prevention and Management

Representor Number	Representor Name	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
34485	Pembrokeshire Coast National Park Authority		14	DP SP 21 Waste Prevention and Management	Support	No comment	Policy SP 21 Waste Prevention and Management: The two Authorities are in agreement on their respective roles on waste planning and management Each authority develops its own waste planning policies for the respective planning areas, but the County Council has waste management responsibility for the whole County. Support Policy SP 21 Waste Prevention and Management.			Support welcomed. No change required.				No			

5.0 Policy GN 01 General Development Policy

Representor Number	Representor	Agent	Representation :	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit :	Other Edit No.	See Focussed Change (FC) No.
1533	Home Builders Federation (Mark Harris)		1	DP GN 1 General Development Policy	Object	No	**GN1, criterion 1.** The nature, location, siting and scale of the proposed development is compatible with the capacity and character of the site and the area within which it is located; The HBF considers this an extremely subjective requirement with no guidance offered to what is likely to be acceptable. How does a developer comply with this and at what stage in the planning process is a decision made to a scheme's compliance?			Agree focussed change needed.			Partly agree with this representation. The reference to capacity in this criterion is proposed for deletion in response to another representation. However, with regard to character, a lot of work has been done to assess landscape character in the County which can be used to help the assessment of site-specific proposals, so this element of the criterion will be retained. The Council has consulted upon a Landscape Character Assessment Supplementary Planning Guidance under Local Development Plan 1. It is intended that this guidance will be adopted in due course and taken forward under Local Development Plan 2.	Yes			FC5.GN01.01 to FC5.GNO1.07
1544	The Coal Authority (trading name - the Mining Remediation Authority)		1	DP GN 1 General Development Policy	Object	No	Within the Pembrokeshire County area our records indicate that there is significant coal mining legacy including; over 1,000 mine entries, coal workings and reported surface hazards. These features pose a potential risk to surface stability and public safety. We acknowledge that land instability risks are identified in paragraph 5.9 of the plan and are pleased to see these noted. We are however disappointed to note that policies within the draft plan do not include consideration of risks posed to new development by ground instability arising from past coal mining activity. In order to address what we consider to be a policy omission is it requested that an amendment is made to Policy GN1 at criteria 8 so that it reads as follows:			Agree focussed change needed.			The change to criterion 8 of GN 1 proposed by this representor is agreed, as it incorporates a reference to an important issue in the Plan area into the policy text (it is already referenced in the reasoned justification to the policy).	Yes			FC5.GN01.01 to FC5.GNO1.07

Representor Number	Representor	Agent	Representation :	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit :	Other Edit No.	See Focussed Change (FC) No.
							8. It would not cause or result in unacceptable harm to health and safety, including through flood risk; **land instability;**										
1545	Network Rail		1	DP GN 1 General Development Policy	Comment	No comment	**GN1 - General Development Policy** Below I have included examples from other Local Authorities where the assessment of level crossing impact has been included in plan policy. The local authority should look to include something similar for level crossing assessment and mitigation requirements within their plan policy documents. • Sedgemoor District Council Local Plan 2011 – 2032 (Adopted 20 February 2019) Policy D14 - Managing the Transport Impacts of Development (page 133) Development proposals that will have a significant transport impact should: OFFICIAL • Adequately assess and provide any required improvements to level crossings where development may result in a material increase in pedestrian and/or vehicular use of a level crossing, in consultation with Network Rail. Relevant criterion from the full policy provided in the original representation copied below: Adequately assess and provide any required improvements to level crossings where development may result in a material increase in pedestrian and/or vehicular use of a level crossing, in consultation with Network Rail. Under Policy GN1 of the Pembrokeshire LDP it would be beneficial to include similar wording to ensure level crossings are adequately assessed.			Agree focussed change needed.			Modify GN 1 (6) by adding further text relating to improvements to level crossings. Add a further sentence to paragraph 5.7 of the reasoned justification to GN 1 to elaborate on this matter.	Yes			FC5.GN01.01 to FC5.GNO1.07

Representor Number	Representor	Agent	Representation	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit	Other Edit No.	See Focussed Change (FC) No.
4440	M Pritchard		1	DP GN 1 General Development Policy	Comment	No comment	Please find below my comments on the new LDP2: · 1) In order to conform with the requirements of the Equality Act 2010 all new sites covered by the LDP 2 together with classifications of development, the developer must ensure that access to the development must be accessible to all users. · Access within the development site must conform with the requirements of the Equality Act 2010 which could generally be covered via a Building Regulation submission and or conditions to planning. · Suggest that all new development sites must be provided with adequate charging facilities for ELV's. This must include provision for both accessible and able bodied provision. · When an application is considered by the Planning Team, consideration should be given for the long term requirements for the site ie provision of heating systems that will be required after gas has been prohibited. This could change the character of the site with the requirement for say a proliferation of heat pumps and solar panels etc. · Consider the provision of the infrastructure for the development site at planning stage, ie provision and capacity of all services ie gas, electricity water etc not just sewage. Sprinkler pump storage must be indicated as part of the planning designs. · Provide a thermal efficiency criteria for all units on a development site to ensure long term viability and energy conservation I trust the above is of assistance but should you wish to discuss any of my points further then please do not hesitate to contact me.			Comment noted. No change required.			Building Regulations ensure that new homes have level access, a ground floor bathroom and are adaptable. All new affordable housing will be built to the Welsh Government Development Quality Standards and 20% of market housing (on sites of 5 or more dwellings) will be required to be built to Lifetime Home Standards. These standards will ensure that homes are flexible and make provision for people with a range of disabilities. Where residential development is proposed there must be provision made for electric vehicle charging points. In non-residential development there is a minimum requirement of 10% of spaces that require charging points. In terms of accessible charging points this will be covered in new supplementary planning guidance on parking standards. Several policies deal with site infrastructure (the provision of services) and with planning for long term requirements of a development (eg heat pumps). These include GN 4 Resource Efficiency and Renewable and Low-carbon Energy Proposals, GN 1 General Development Policy and GN 3 Infrastructure and New Development. Sprinkler water tank storage considerations are now a standard part of any new	No			

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													housing development and will be considered in a building regulations application. Thermal efficiency standards for development are also covered by building regulations with new tighter standards rolled out in 2022.				
2603	Dwr Cymru		3	DP GN 1 General Development Policy	Support	No comment	**GN1 General Development Policy** We support this policy that requires development to protect the natural environment and have no significant adverse impact on water quality. We fully support measures to prevent the degradation of water resources.			Support welcomed. No change required.				No			
4387	PRL Partnership	Lichfield (4409)	4	DP GN 1 General Development Policy	Object	No	**GN 1 General Development Policy** A detailed submission is provided regarding the policy criteria, related tests of soundness and provisions of PPW. The specific references are to criteria 1, 2, 3, 4 and 6 of the policy and in all except one case, revised policy wording is proposed.			Agree focussed change needed.			The representation refers to five of the policy criteria. The representor proposes a single word deletion from criterion 1, which is supported. A re-wording / splitting of criterion 2 is proposed, which has been agreed and incorporated into a Focussed Change under a separate representation. Criterion 3 is supported by the representor. Criteria 4 and 6 are proposed for amendment by the representor and these changes are agreed, although with slightly different wording to that provided.	Yes			FC5.GN01.01 to FC5.GNO1.07
4388	Haven Leisure Ltd	Lichfields (4409)	4	DP GN 1 General Development Policy	Object	No	A detailed submission is provided regarding the tests of soundness and an amended policy wording is proposed. Modifications are proposed to criteria 1, 2, 4, 6, 8 and 9 of GN 1.			Agree focussed change needed.			Modifications to criteria 1, 2, 4, 6, 8 and 9 are proposed.	Yes			FC5.GN01.01 to FC5.GNO1.07

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4409	Pembrokeshire Living Ltd	Lichfields (4409)	7	DP GN 1 General Development Policy	Object	No	Detailed submission requesting the re-wording of Policy GN 1, criterion 2			Agree focussed change needed.			The representation is broadly supportive of most aspects of GN 1 but has concerns regarding the detailed wording of criterion 2 of the policy. The representor proposes splitting the criterion into two parts and has provided a detailed assessment grounded in PPW to justify the changes proposed. These are accepted and a Focussed Change will be introduced which closely follows the suggested wording provided.	Yes			FC5.GN01.01 to FC5.GNO1.07
4393	Welsh Government Place Division, Housing and Regeneration Directorate	Lichfields (4394)	8	DP GN 1 General Development Policy	Object	No	Soundness Tests 1 and 3 The general development principles set out in this policy will apply to all new developments and are broadly aligned with the Welsh Government's commitment to sustainability, placemaking and the wellbeing of future generations. We agree with the majority of the criteria contained within the policy but would note the following: 1. Criterion 2 should separate visual impact from the pollution impacts; 2. In line with the approach set out in criteria 3, 4 and 5, the policy should allow for mitigation measures in respect of visual and pollution impacts (criterion 2), highway impacts (criterion 6), flood risk (criterion 8), and water quality (criterion 9). This would reflect the provisions of PPW which states that mitigation measures can be applied to planning permissions in order to address any potentially adverse impacts associated with development proposals. The proposed development will be designed to comply with each of the criteria set out in Policy GN1 and evidence will be provided with the planning application in respect of these matters.			Agree focussed change needed.			Criteria 2, 6, 8 and 9 will be modified to make reference to mitigation measures.	Yes			FC5.GN01.01 to FC5.GNO1.07

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34450	Natural Resources Wales		9	DP GN 1 General Development Policy	Support	No comment	We note the reference to our Flood Map for Planning and that no housing allocations have been identified within flood zones C1 and C2. We have also received confirmation that all allocations have been screened using Flood Map for Planning. We are supportive of the general development policy and note that the criteria specified will help secure SMNR, protecting against impact to the natural environment including habitats, species, soils and water quality.			Support welcomed. No change required.				No			
34485	Pembrokeshire Coast National Park Authority		15	DP GN 1 General Development Policy	Support	No comment	Support approach in principle.			Support welcomed. No change required.				No			
34485	Pembrokeshire Coast National Park Authority		16	DP GN 1 General Development Policy	Support	No comment	Policy GN 1, Criterion 3) The National Park Authority welcomes and supports the reference in criterion 3 to the need to protection the special qualities of the National Park. Both Plans take account of the need to not compromise either individually or cumulatively the qualities of important landscapes including the Pembrokeshire Coast National Park. Paragraph 5.4 recognises that the Plan area has many landscapes which have close physical and functional interrelationships with the National Park and states that proposed development will need to respect that which is welcomed.Support Policy GN.1 criterion 3) protecting the special qualities of the National Park is supported.			Support welcomed. No change required.				No			
34485	Pembrokeshire Coast National Park Authority		17	DP GN 1 General Development Policy	Comment	No comment	Policy GN1, Criterion 6) – this requires developments to be located in 'an accessible location'. Paragraph 5.7 details that 'development should be highly accessible' but it is not clear what is meant by this term. Note: **GN 1 – the Plan might benefit from clarification of the terms 'accessible' and 'highly accessible'.**			Agree focussed change needed.				Yes			FC1.Context.02

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34485	Pembrokeshire Coast National Park Authority		18	DP GN 1 General Development Policy	Support	No comment	Paragraph 5.16 The supporting text to policy GN 1 refers to the preparation of joint SPG on Lighting and Dark Skies which is supported.			Support welcomed. No change required.				No			
34485	Pembrokeshire Coast National Park Authority		39	DP GN 1 General Development Policy	Comment	No comment	GN.1 – General Development Policy - assessment against SA Objective 20. Policy seems to be lacking any reference to the historic environment in general beyond character. What about archaeology?				The amendment suggested is already addressed by the Plan. No change is needed.		The Plan has a policy on Historic Environment (GN 28) which deals with the Protection and Enhancement of the Historic Environment which would be read alongside Policy GN 1 General Development Policy . Please see LDP 2 Deposit Plan Policy GN 28 Protection and Enhancement of the Historic Environment.	No			

5.0 Policy GN 02 Sustainable Design and Placemaking

Representor Number	Representor	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
4005	National Grid Electricity Transmission	Avison Young (4267)	1	DP GN 2 Sustainable Design and Placemaking	Comment	No comment	Utilities Design Guidance The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by NGET. NGET advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around high voltage overhead lines and other NGET assets. Therefore, to ensure that Proposed Policy 'GN 2 Sustainable Design and Placemaking' is consistent with national policy we would request the inclusion of a policy strand such as: "It takes a comprehensive and co-ordinated approach to placemaking, including respecting existing site constraints including utilities situated within sites."			Agree focussed change needed.				Yes			FC5.GN02.02
4339	National Gas Transmission	Avison Young (4267)	2	DP GN 2 Sustainable Design and Placemaking	Comment	No comment	Utilities Design Guidance The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by National Gas Transmission infrastructure. National Gas Transmission advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development			Agree focussed change needed.				Yes			FC5.GN02.02

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							around underground gas transmission pipelines and other National Gas Transmission assets. Therefore, to ensure that Proposed Policy 'GN 2 Sustainable Design and Placemaking' is consistent with national policy we would request the inclusion of a policy strand such as: "It takes a comprehensive and co-ordinated approach to placemaking, including respecting existing site constraints including utilities situated within sites."										
4440	M Pritchard		2	DP GN 2 Sustainable Design and Placemaking	Comment	No comment	Please find below my comments on the new LDP2: · 1) In order to conform with the requirements of the Equality Act 2010 all new sites covered by the LDP 2 together with classifications of development, the developer must ensure that access to the development must be accessible to all users. · Access within the development site must conform with the requirements of the Equality Act 2010 which could generally be covered via a Building Regulation submission and or conditions to planning. · Suggest that all new development sites must be provided with adequate charging facilities for ELV's. This must include provision for both accessible and able bodied provision. · When an application is considered by the Planning Team, consideration should be given for the long term requirements for the site ie provision of heating systems that will be required after gas has been prohibited. This could change the character of the site with the requirement for say a proliferation of heat pumps and solar panels etc. · Consider the provision of the			Comment noted. No change required.			Building Regulations ensure that new homes have level access, have a ground floor bathroom and are adaptable. All new affordable housing will be built to the Welsh Government Development Quality Standards and 20% of market housing (on sites of 5 or more dwellings) will be required to be built to Lifetime Home Standards. These standards will ensure that homes are flexible and make provision for people with a range of disabilities. Where residential development is proposed there must be provision made for electric vehicle charging points. In non-residential development there is a minimum requirement of 10% of spaces that require charging points. In terms of accessible	No			

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							infrastructure for the development site at planning stage, ie provision and capacity of all services ie gas, electricity water etc not just sewage. Sprinkler pump storage must be indicated as part of the planning designs. · Provide a thermal efficiency criteria for all units on a development site to ensure long term viability and energy conservation I trust the above is of assistance but should you wish to discuss any of my points further then please do not hesitate to contact me.						charging points this will be covered in new supplementary planning guidance on parking standards. Several policies deal with site infrastructure (the provision of services) and with planning for long term requirements of a development (eg heat pumps). These include GN 4 Resource Efficiency and Renewable and Low-carbon Energy Proposals, GN 1 General Development Policy and GN 3 Infrastructure and New Development. Sprinkler water tank storage considerations are now a standard part of any new housing development and will be considered in a building regulations application. Thermal efficiency standards for development is also covered by building regulations with new tighter standards rolled out in 2022.				

Representor Number	Representor	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
2603	Dwr Cymru		4	DP GN 2 Sustainable Design and Placemaking	Support	No comment	**GN2 Sustainable Design and Placemaking** We welcome that the policy requires development to incorporate a resource efficient and climate responsive design, of which water conservation and the use of sustainable urban drainage systems is an important aspect. The tackling of surface water at source is a vital component of sustainable development and managing surface water at source will mitigate against overloaded sewers which can ultimately lead to flooding.			Support welcomed. No change required.				No			
4377	Ateb	Stantec(4376)	6	DP GN 2 Sustainable Design and Placemaking	Support	No comment	We endorse the principles of GN2 Sustainable Design and Placemaking, emphasising the importance of design proposals that arise from a thorough understanding of the site and its context, rather than relying on generic site layouts and building types. The emerging concept plan considers the development on neighbouring land and integrates its broad design and layout principles to create attractive and functional spaces that blend seamlessly with recent developments adjacent. The current promoter, ateb Group, will also serve as the delivery partner, ensuring early involvement in the layout and design preparation to meet their high standards of quality. ateb Group properties are constructed to the Welsh Government's Development Quality Requirements, which include the Welsh Housing Quality Standard and Secured by Design, all part of Lifetime Homes.	Letterston	HSG/053/LDP2/1.	Support welcomed. No change required.				No			

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4409	Pembrokeshire Living Ltd	Lichfields (4409)	8	DP GN 2 Sustainable Design and Placemaking	Object	No	Detailed submission requesting the re-wording of Policy GN 2.			Agree focussed change needed.		Agree in part - criterion 3 of GN 2 should be modified to make reference to the circular economy, but a complete re-draft of this criterion is not necessary as other elements are sound.	There are various references in PPW edition 12 to the circular economy. The concept of the circular economy relates to many different aspects of land use planning, including climate change mitigation, decarbonisation aspirations, design choices and construction practices, amongst other things. Circular economy principles seek to reduce unnecessary waste, promote use of durable materials, influence the proportions of waste going to different parts of the waste hierarchy and support the use of secondary aggregates in production. There are, of course, links to sustainable design and best practice in placemaking, but it has other facets as well. PCC agrees in part with the representation and proposes to include a specific reference to the circular economy through modification of criterion 3 of GN 2. However, it is not our view that this criterion needs to be completely re-drafted, as the other aspects of it (some of which link in to circular economy	Yes			FC5.GN02.01 FC5.GN02.02

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													principles, others not so) remain highly relevant.				
4393	Welsh Government Place Division, Housing and Regeneration Directorate	Lichfields (4394)	9	DP GN 2 Sustainable Design and Placemaking	Object	No	**Criterion 3:** Recognising the intention to seek to reduce the use of resources, to reduce climate change emissions, and to adopt an energy efficient response, an alternative approach is proposed. Whilst we appreciate the requirement for the use of local and sustainable construction materials, it should be replaced with a new criterion requiring the exploration of opportunities in line with the circular economy principles on a project-by-project basis, subject to viability. Any such policy requirement should be precise and measurable.					Agree in part.	There are various references in PPW edition 12 to the circular economy. The concept of the circular economy relates to many different aspects of land use planning, including climate change mitigation, decarbonisation aspirations, design choices and construction practices, amongst other things. Circular economy principles seek to reduce unnecessary waste, promote use of durable materials, influence the proportions of waste going to different parts of the waste hierarchy and support the use of secondary aggregates in production. There are, of course, links to sustainable design and best practice in placemaking, but it has other facets as well. PCC agrees in part with the	Yes			FC5.GN02.01 FC5.GN02.02

Representor Number	Representor	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
													representation and proposes to include a specific reference to the circular economy through modification of criterion 3 of GN 2. However, it is not our view that this criterion needs to be completely re-drafted, as the other aspects of it (some of which link in to circular economy principles, others not so) remain highly relevant.				
34450	Natural Resources Wales		10	DP GN 2 Sustainable Design and Placemaking	Support	No comment	We are encouraged to note that this policy will also apply to alterations and extensions to existing buildings.			Support welcomed. No change required.				No			
34485	Pembrokeshire Coast National Park Authority		19	DP GN 2 Sustainable Design and Placemaking	Support	No comment	Support approach in principle.			Support welcomed. No change required.				No			

5.0 Policy GN 04 Resource Efficiency and Renewable and Low-carbon Energy Proposals

Representor Number	Representor Name	Agent	Representation	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit	Other Edit No.	See Focussed Change (FC) No.
3719	G Price	Boyer (4012)	6	DP GN 4 Resource Efficiency and Renewable and Low-carbon Energy Proposals	Support	No comment	**GN 4 Resource Efficiency and Renewable and Low-carbon Energy** In principle there is support regarding proposed development seeking to minimise resource demand, improve resource efficiency and seek power generated from renewable resources, where appropriate. **The Council will be aware from the Candidate Submissions relating to the proposed allocation HSG/003/LDP2/01– North of Begelly Farm, that our client owns a further significant area of land to the west, which we consider is suitable to provide renewable energy if required.** Ideally this would be Solar Photovoltaic Array, and our client is open to discussions on this matter.	Begelly	LDP2/Deposit2/New Site 20	Comment noted. No change required.			This submission has come late in the LDP 2 plan preparation process, the site has therefore not been constraints checked through the Candidate Site assessment process. PCC is also concerned that introducing a completely new site to a rural settlement at this late stage in the process would not be ideal, as there has been no prior community consultation. However, the appropriateness of a new solar array can be considered under criteria based policies under either LDP 1 or LDP 2 policies.	No			
34485	Pembrokeshire Coast National Park Authority		21	DP GN 4 Resource Efficiency and Renewable and Low-carbon Energy Proposals	Support	No comment	Policy GN 4 Resource Efficiency and Renewable and Low-carbon Energy proposals: Both Plans seek the delivery of appropriate renewable energy developments, considering landscape impact alone and in-combination. Both Authorities have adopted joint guidance on assessing the Cumulative Impact of Wind Turbines. Both Authorities carry out joint monitoring of provision annually. Both Authorities have considered removal of temporary structures and community benefits. Support GN 4 Resource Efficiency and Renewable and Low-carbon Energy proposals.			Support welcomed. No change required.				No			

5.0 Policy GN 05 Renewable Energy – Target and Allocations

Representor Number	Representor	Agent	Representation :	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit :	Other Edit No.	See Focussed Change (FC) No.
4002	Mr H Dyer		2	DP GN 5 Renewable Energy – Target and Allocations	Object	No	I wish to object to the plans to establish a solar park on this site for numerous reasons. The site is at the end of a congested residential cul-de-sac with a popular children's playground in it. The additional construction traffic is an unacceptable risk to health & safety of both the residents and visitors. Furthermore, the use of a greenfield site such as this for a solar park goes against Pembrokeshire County Council's own Pembrokeshire Local Biodiversity Action Plan 2011. There are numerous residential and brown field sites more suited to this proposal	Llanstadwell	SPV/066/LDP2/01		The amendment suggested is not supported by the Plan's evidence base.		Construction traffic risk to health and safety– the construction of the site will inevitably create some disruption; however, the health and safety risk can be controlled by good site management and procedures. Highways have not objected to the site coming forward. Ecology – The proposed site is an agricultural field. The PCC ecologist has not objected to the allocation and has suggested enhancements for the development to enhance biodiversity.	No			
4140	P & N Clarke		2	DP GN 5 Renewable Energy – Target and Allocations	Object	No	I wish to object to both plans due to increased construction and residential traffic which would overload already overcrowded single track roads. I am also extremely concerned that the existing infrastructure would be unable to cope with the increased requirement for parking, drainage, waste and water supply etc. The land, outside the village boundary, adjoins our house and garden, and I believe that both these proposals will adversely impact ourselves, other residents and local families who use the playpark.	Llanstadwell	SPV/066/LDP2/01		The amendment suggested is not supported by the Plan's evidence base.		Highways have been consulted on the proposed development and have not objected to the site coming forward. Dwr Cymru have also been consulted on the proposal and have not raised any concerns. Any development will have to comply with Local Development Plan policies which will address amenity issues of local residents.	No			

Representor Number	Representor	Agent	Representation No.	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
4421	Defence Infrastructure Organisation (DIO)		2	DP GN 5 Renewable Energy – Target and Allocations	Comment	No comment	It is noted that 'the former Brawdy Airfield site' is referred to in the supporting text to policy GN 5 Renewable Energy – Target and Allocations and "a possibility of a further Solar PV Array on part of the former Brawdy Airfield site". Whilst MoD has no objection to these references within the supporting text it would draw attention to the comments in relation to possible ongoing military use of Cawdor Barracks in whole or part made in relation to policy GN 7 and that any ongoing military use of Cawdor Barracks would take precedence.	Proposal Map & Inset Map Key	Cawdor Barracks & Brawdy Airfield	Agree focussed change needed.			Detailed edits are proposed to Policy GN 7 this representation.	Yes			FC5.GN07.01 FC5.GN07.02 FC5.GN07.03 FC5.GN07.04 FC5.GN07.05
2603	Dwr Cymru		6	DP GN 5 Renewable Energy – Target and Allocations	Comment	No comment	**GN5 Renewable Energy SPV/149/LDP2/01 West of Ford Farm, Wolfscastle** – this allocated site is crossed by a 3" diameter watermain and protection measures in the form of an easement width or a diversion of the main will be required.	Countryside	SPV/149/LDP2/01 West of Ford Farm, Wolfscastle	Comment noted. No change required.			To note that a water main crosses the site and will need to be taken into consideration in designing the layout for the site.	No			
3719	G Price	Boyer (4012)	7	DP GN 5 Renewable Energy – Target and Allocations	Support	No comment	**GN5 – Renewable Energy – Targets and Allocations** In terms of Policy GN5 support is again provided in relation to the Council seeking to permit a minimum additional 9MW per annum renewable energy capacity over the Plan period. Whilst no specific comment is raised in relation to the proposed energy allocations, our client confirms that they are wholly amenable to having discussions with the Council in relation to any potential Solar Photovoltaic Array development on the wider land to the west of HSG/003/LDP2/01– North of Begelly Farm. At no point is this considered to be detrimental to the development of HSG/003/LDP2/01– North of Begelly Farm, which is the first and foremost priority for our client.	Begelly	LDP2/Deposit2/ New Site 20	Comment noted. No change required.			This submission has come late in the LDP 2 plan preparation process, the site has therefore not been constraints checked through the Candidate Site assessment process. PCC is also concerned that introducing a completely new site to a rural settlement at this late stage in the process would not be ideal, as there has been no prior community consultation. However, the appropriateness of a new solar array can considered under criteria based policies under either LDP 1 or LDP 2 policies.	No			

Representor Number	Representor	Agent	Representation :	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit :	Other Edit No.	See Focussed Change (FC) No.
							However, in the spirit of collaborative working the wider site can be made available for the appropriate use.										
1507	Welsh Government		13	DP GN 5 Renewable Energy – Target and Allocations	Comment	No comment	**Renewable Energy & Minerals The Council needs to clarify the choices made in relation to renewable energy and the DCPO letter of 1/03/2022 by the then Minister for Climate Change in respect of Solar PV developments and BMV** as well as updates to Chapter 6 of PPW in respect of the 'stepwise approach' to peat soils and peatland habitats as well and para 6.4.34 regarding peatland. **Apart from this clarification, the Welsh Government is content that previous representations have been addressed and the plan is compliant with the DPM and national planning policy.**			Agree no change required.			In the candidate site assessment process no sites were submitted to be allocated as a solar array. In light of the need to meet renewable energy commitments PCC has identified authority owned housing candidate sites which have the potential for the development of small-scale renewable energy schemes. This limited the choice of site which the authority could allocate for solar arrays. The allocations reflect the overriding need to meet renewable energy targets to address the climate emergency.	No			

5.0 Policy GN 07 Cawdor Barracks including the former Brawdy Airfield

Representor Number	Representor	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit	Other Edit No.	See Focussed Change (FC) No.
4421	Defence Infrastructure Organisation (DIO)		1	DP GN 7 Cawdor Barracks including the former Brawdy Airfield	Comment	No comment	A detailed submission is provided with suggested rewording of the Policy.	Proposal Map & Inset Map Key	Cawdor Barracks & Brawdy Airfield	Agree focussed change needed.			The DIO has provided suggested amendments to the policy text and reasoned justification to GN 7, which are welcomed. Changes proposed to the policy wording and reasoned justification reflect those put forward by the DIO.	Yes			FC5.GN07.01 FC5.GN07.02 FC5.GN07.03 FC5.GN07.04 FC5.GN07.05
2603	Dwr Cymru		7	DP GN 7 Cawdor Barracks including the former Brawdy Airfield	Comment	No comment	**GN7 Cawdor Barracks including the former Brawdy Airfield** The capability of our infrastructure to support redevelopment of the site will be assessed once further information is available regarding proposals. There may be requirements for the developer to undertake hydraulic modelling assessments (HMAs) of the clean water and/or sewerage networks to identify any reinforcement work required to service the site. Similarly, the impact of development on Newgale Wastewater Treatment Works (WwTW) will be dependent on the amount of development proposed to connect to the public sewerage network. Should this exceed the theoretical design capacity of the WwTWs then developers may need to fund a Developer Impact Assessment (DIA) to identify required reinforcement works. In these instances, a s106 commercial agreement would be required between the developer and Welsh Water to deliver the necessary improvements.The site is crossed by a 2.5” diameter rising main pressurised sewer, and an easement will be required to ensure that we can access the	Countryside	GN7 Cawdor Barracks incl the former Brawdy Airfield	Comment noted. No change required.			To note: potential need for hydraulic modelling assessments and reinforcement work; potential impacts on the Newgale WwTW and for a Developer Impact Assessment; potential need for s106 commercial agreement; the site is crossed by a rising main pressurised sewer and an easement will be needed to ensure DCWW access; and DCWW would welcome early involvement in preparation of a Development Brief	No			

Representor Number	Representor	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit	Other Edit No.	See Focussed Change (FC) No.
							pipes. We note the intention is to produce a Development Brief in future for the site, we would welcome involvement at an early stage.										
34485	Pembrokeshire Coast National Park Authority		22	DP GN 7 Cawdor Barracks including the former Brawdy Airfield	Object	No	GN 7 Cawdor Barracks including the former Brawdy Airfield Criterion c) identifies part of the airfield as being specifically allocated for a solar PV array by Policy GN 5, but GN 5 does not identify any part of the site for solar. In addition, Candidate Site 184 states that the site is allocated for potential MOD development. A detailed assessment of the site was undertaken in summer 2019 by the National Park Authority and details of the Authority's concerns relating to the impact development at this location would have on the special qualities of the National Park are included as part of this submission. Criterion h) which takes account of the potential landscape impact on the Pembrokeshire Coast National Park is welcomed.Object: Clarification is requested regarding the allocation of the land in terms of a solar PV array and the safeguarding of the site for HRDF.			Agree focussed change needed.			Agree - the policy GN 5 solar array allocation at Brawdy Airfield included in Deposit Plan 1 was omitted from the version of GN 5 included in Deposit Plan 2 at the request of the DIO / MoD, with a more generalised approach substituted. That was a reflection of uncertainties identified by the DIO / MoD regarding potential conflicts with the HRDF and other onsite infrastructure. The final sentence of GN 7, point 1, item c) is therefore proposed for deletion. To note: criterion c) references the need for due account to be taken f the potential landscape impact on the Pembrokeshire Coast National Park. The change proposed will continue to reference the HRDF but a reference will also be added to 'other onsite infrastructure'. There is also a need for a consequential change to the reasoned justification for GN 7 (paragraph 5.59).	Yes			FC5.GN07.01 FC5.GN07.02 FC5.GN07.03 FC5.GN07.04 FC5.GN07.05

5.0 Policy GN 08 Employment Proposals

Representor Number	Representor Name	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
34485	Pembrokeshire Coast National Park Authority		23	DP GN 8 Employment Proposals	Support	No comment	Policies GN 8 – 12 Employment GN 11 Protection of Employment Sites and Buildings is in general conformity with PCNPA's policy. Support Employment policies GN 8 - 12			Support welcomed. No change required.				No			

5.0 Policy GN 09 Employment Allocations

Representor Number	Representor Name	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
2603	Dwr Cymru		100	DP GN 9 Employment Allocations	Comment	No comment	**EMP/093/00001 North of Honeyborough Industrial Estate, Neyland** No watermains crossing the site. No sewers crossing the site. Site is in the catchment area of Neyland WwTW	Countryside	EMP/093/00001	Comment noted. No change required.				No			
2603	Dwr Cymru		92	DP GN 9 Employment Allocations	Comment	No comment	**EMP/030/00001 Parc Gwynfryn, Crymych** The site is crossed by a 90mm diameter watermain. The site is crossed by an 80mm diameter pressurised rising main sewer, and a Sewage Pumping Station (SPS) is located on the site. Site is in the catchment area of Crymych WwTW.	Countryside	EMP/030/00001	Comment noted. No change required.			To note that a water main crosses the site and there is a pumping station on the site which will need to be taken into consideration in designing the layout for the site.	No			
2603	Dwr Cymru		93	DP GN 9 Employment Allocations	Comment	No comment	**EMP/034/00006 Celtic Link Business Park, nr Scleddau** The site is crossed by a 3" diameter watermain. There are no public sewers near the site. N/a	Countryside	EMP/034/00006	Comment noted. No change required.			To note that a water main crosses the site and will need to be taken into consideration in designing the layout for the site.	No			
2603	Dwr Cymru		94	DP GN 9 Employment Allocations	Comment	No comment	**EMP/040/LDP2/01 Withybush Showground, Haverfordwest** No watermains crossing the site. No sewers crossing the site. Site is in the catchment area of Merlin's Bridge WwTW	Countryside	EMP/040/LDP2/01	Comment noted. No change required.				No			
2603	Dwr Cymru		95	DP GN 9 Employment Allocations	Comment	No comment	**EMP/053/00001 Old Station Yard, Letterston** The site is crossed by an 80mm diameter watermain. The site is crossed by a 150mm diameter sewer. Site is in the catchment area of Letterston West WwTW	Countryside	EMP/053/00001	Comment noted. No change required.			To note that a water main and a sewer cross the site and will need to be taken into consideration in designing the layout for the site.	No			

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2603	Dwr Cymru		98	DP GN 9 Employment Allocations	Comment	No comment	**EMP/030/LDP2/01 South of Parc Gwynfryn, Crymych** No watermains crossing the site. No sewers crossing the site. Site is in the catchment area of Crymych WwTW	Countryside	EMP/030/LDP2/01	Comment noted. No change required.				No			
2603	Dwr Cymru		97	DP GN 9 Employment Allocations	Comment	No comment	**EMP/000/LDP2/01 Land at Princes Gate Spring Water** No watermains crossing the site. There are no public sewers near the site. N/a	Countryside	EMP/000/LDP2/01	Comment noted. No change required.				No			
2603	Dwr Cymru		96	DP GN 9 Employment Allocations	Comment	No comment	**EMP/088/LDP/01 Rushacre Enterprise Park extension, Narberth** The site is crossed by a 90mm diameter watermain. No sewers crossing the site. Site is in the catchment area of Narberth West WwTW	Countryside	EMP/088/LDP/01	Comment noted. No change required.			Development has commenced at this site.	No			
2603	Dwr Cymru		99	DP GN 9 Employment Allocations	Comment	No comment	**EMP/132/LDP2/01 South of KP Thomas & Sons, Templeton** No watermains crossing the site. There are no public sewers near the site. N/a	Countryside	EMP/132/LDP2/01	Comment noted. No change required.				No			
4434	Mr James	Harries Planning (4430)	1	DP GN 9 Employment Allocations	Object	No	Land north of Bwlchclawdd Bach, Crymych, SA41 3RL.This representation seeks the inclusion of the above-mentioned site as 'an employment site for A1, A2, B2 and suis generis use for an energy centre' within the revised settlement boundary of Crymych, a designated Service Centre within the Deposit LDP2. It is submitted on behalf of our client and landowner Mr James. Having considered the consultation documents, it is contended that the LDP is unsound under Soundness Test No. 2 'Is the plan appropriate', in that it fails to address a local need for A1, A2, B2 employment and also the provision of an energy centre (petrol station/electric charging) within Crymych and its surrounding rural area. Furthermore, this site's omission does not appear to be consistent with the LDP's evidence base and drafted policies. The detailed submission comments on the Deposit Plan, the	Crymych	LDP2/Deposit2/ New Site 32		The amendment suggested is not supported by the Plan's evidence base.		This submission has come late in the LDP 2 plan preparation, the site has therefore not been constraint checked through the Candidate Site assessment process. No evidence of need for either retail or employment has been provided in the submission. Both employment sites in Crymych in the Deposit plan, Parc Gwynfryn and South of Parc Gwynfryn have the potential to accept other use classes apart from B1 and B8 where appropriate (see Deposit plan GN 9 Employment Allocations). An edge of settlement location may not be appropriate in terms of retail provision and there is already a petrol station in the village. PCC is also concerned that introducing a completely new site to a rural settlement at this late stage in the process would not be ideal, as there has been no prior community consultation.	No			

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							proposed site and the soundness tests. A site plan is also included.						As such, PCC would suggest that the best way forward is not to allocate this site through LDP 2 or place it in the Settlement Boundary, but rather to await the next Plan review, at which point it could be put forward for consideration through the Candidate Site process and be properly tested throughout the Plan process.				
34409	G James	H Eynon (34628	1	DP GN 9 Employment Allocations	Object	No	Candidate Site 104 (Adjacent to Rushacre Enterprise Park Narberth) should be included as an employment allocation. A detailed 5 page submission is provided commenting on site description, and current status.	Narberth	Candidate Site 104		The amendment suggested is not supported by the Plan's evidence base.		Sites allocated in the Deposit Plan are considered sufficient to meet future demand for local employment sites. Policy GN 8 (Employment Proposals) allows for consideration of speculative proposals coming forward, and in line with National Planning Policy, includes sites adjacent to a Settlement Boundary, if no sites within the Settlement Boundary exist to serve the development.	No			
34758	Eglwyswrw C Council		3	DP GN 9 Employment Allocations	Object	No comment	**Map 3** **Site 231** – We would support the development of this site partly scaled back for employment purposes in the interest of sustaining a current employment site and to provide new sustainable economic opportunities within the period of LDP2. Map 3 provided with the original representation.	Postgwyn	Candidate Site Reference 231		The amendment suggested is not supported by the Plan's evidence base.		Candidate Site 231 has been proposed as an employment site and was considered in the Candidate Site Assessment. The site was screened out of consideration as the Trunk Road Agency objected to the proposal and because the site contains high grade 3a agricultural land. The site could therefore not be brought forward as an allocation.	No			

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2603	Dwr Cymru		8	DP GN 9 Employment Allocations	Comment	No comment	**GN9 Employment Allocations** **The following provisions are applicable to all individual development plots located within allocated employment sites:** • Potential developers should be aware that the obligation of a water and sewerage undertaker extends to 'domestic' supplies only. Where an employment allocation results in higher demands of water supply and/or trade effluent discharges we recommend and welcome early consultation with Welsh Water. • If any development site gives rise to a new discharge (or alters an existing discharge) of trade effluent, directly or indirectly to the public sewerage system, then a Discharge Consent under Section 118 of the Water Industry Act 1991 is required from Welsh Water. Please note that the issuing of a discharge consent is independent of the planning process and a consent may be refused despite planning permission being granted. • The individual plots available for development can represent a substantial area of land for which the potential demands upon our assets are unknown at present. It is essential that we understand these demands to allow us to assess the impact on our assets. It may be necessary for water and/or sewerage hydraulic modelling assessments (HMAs) to be undertaken at the developer's expense to establish where the proposed development could connect to the existing networks, and to identify any required infrastructure improvements. • Water mains and/or sewerage infrastructure required for any potential			Comment noted. No change required.				No			

Representor Number	Representor Name	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
							development site can be acquired through the requisition provisions of the Water Industry Act 1991 (as amended). • Welsh Water always has rights of access to its assets. Where there are water mains and/or sewers crossing sites then protection measures in respect of these assets will be required, usually in the form of an easement width or in some instances a diversion of the asset. Information is provided in the appendix to advise if there are assets crossing the allocated sites and to identify the Wastewater Treatment Works Catchment that the sites are located within.										
34485	Pembrokeshire Coast National Park Authority		24	DP GN 9 Employment Allocations	Support	No comment	Policies GN 8 – 12 Employment GN 11 Protection of Employment Sites and Buildings is in general conformity with PCNPA's policy.Support Employment policies GN 8 - 12			Support welcomed. No change required.				No			

Representor Number	Representor Name	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
2603	Dwr Cymru		9	DP GN 10 Mixed-Use Proposals	Comment	No comment	**GN10 Mixed use housing and employment proposals** We note that MXU/040/01 Old Hakin Road already benefits from planning permission. Our representation on MXU/095/LDP2/01 South Quay is included in the accompanying appendix.	Haverfordwest & Merlins Bridge	MXU/040/01	Comment noted. No change required.				No			
2603	Dwr Cymru		71	DP GN 10 Mixed-Use Proposals	Comment	No comment	**MXU/040/01 Old Hakin Road, Haverfordwest Site** has planning permission, 12/0593/PA	Haverfordwest & Merlins Bridge	MXU/040/01	Comment noted. No change required.				No			
1561	St Dogmaels Community Council		1	DP GN 10 Mixed-Use Proposals	Object	No comment	**Site proposal 209, Land at Western Solar, Croft, Ti yn Western Sola.** St Dogmaels Community Council supports the inclusion of this site for housing for factory workers. The Community Council is well aware of the eco credentials of the company which it has incorporated in its' previous builds resulting in low impact homes built to a high standard at an affordable build cost. The Community Council would welcome such an initiative in its' ward. **St Dogmaels (Croft)**	St Dogmaels	Candidate Site 209		The housing provision is set out in detail in the Plan to respond to the Plan's housing requirement and it is considered to be sufficient without the need to consider further housing sites.		Candidate Site 209 has been proposed for residential use and was considered in the Candidate Site Assessment. The site was screened out as it is not within 250m of a Service Village, Service Centre or Main Town or adjacent to a Cluster Local Village. Proposals for residential development are not supported by the Deposit Plan in this type of location.	No			
34485	Pembrokeshire Coast National Park Authority		25	DP GN 10 Mixed-Use Proposals	Support	No comment	Policies GN 8 – 12 Employment GN 11 Protection of Employment Sites and Buildings is in general conformity with PCNPA's policy.Support Employment policies GN 8 - 12			Support welcomed. No change required.				No			

5.0 Policy GN 11 Protection of Employment Sites and Buildings & Policy GN 12 Extensions to Employment Sites

Representor Number	Representor Name	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
34485	Pembrokeshire Coast National Park Authority		26	DP GN 11 Protection of Employment Sites and Buildings	Support	No comment	Policies GN 8 – 12 Employment GN 11 Protection of Employment Sites and Buildings is in general conformity with PCNPA's policy.Support Employment policies GN 8 - 12			Support welcomed. No change required.				No			
34485	Pembrokeshire Coast National Park Authority		27	DP GN 12 Extensions to Employment Sites	Support	No comment	Policies GN 8 – 12 Employment GN 11 Protection of Employment Sites and Buildings is in general conformity with PCNPA's policy.Support Employment policies GN 8 - 12			Support welcomed. No change required.				No			

5.0 Policy GN 13 Residential Development

Representor Number	Representor	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
4409	Pembrokeshire Living Ltd	Lichfields (4409)	2	DP GN 13 Residential Development	Object	No	Detailed submission requesting the re-wording of Policy GN 13.					The suggested amendment regarding the exceptional circumstances for altering density is agreed. As set out in 4409/1 referencing to just the geography of Housing Market Areas to identify need is not considered appropriate.	The role of this policy is to advise where in principle residential development is permitted and what circumstances would mean that the density anticipated could change. A re-wording is proposed as a focussed change. GN 13 Residential Development - Residential development ~~**including self-build**~~ will be permitted ~~**where the proposal is for one or more of the following**~~: 1. ~~**Open market housing (including self-catering accommodation) or affordable housing to meet local needs, located**~~ within the Settlement Boundary of a Main or Rural Town, Service Centre, Service Village or Local Village as defined in the settlement hierarchy; 2. **Where it is for** ~~**T**~~**t**he replacement or sub- division of an existing dwelling; **or** 3. The conversion of an historic building to residential use; or 4. A rural enterprise worker's dwelling or One Planet development New homes on allocated sites in Service Centres and Service Villages and otherwise on sites of 0.10 hectares and above will be built at a density of at least 23 dwellings per hectare, rising to at least 30 dwellings per hectare for sites in Towns. **A lower density may be justified** ~~**i**~~**I**n exceptional circumstances**, such as** evidence of infrastructure or physical constraints ~~**may justify a lower density**~~.	Yes			FC5.GN13.02

5.0 Policy GN 15 Housing Mix etc.

Representor Number	Representor Name	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
4377	Ateb	Stantec(4376)	7	DP GN 15 Housing Mix, Second Homes and Short-term Holiday Lets, Space Standards and Requirements for Lifetime Homes Standards	Support	No comment	Draft Policy GN15 Housing Mix seeks to balance maximising the delivery of affordable housing in accordance with Policy GN 20 – Local Needs Affordable Housing and provide an appropriate mix of housing types, tenures and bedroom numbers, to meet the identified needs of the Plan's current and future communities. The Policy requires all new build residential development on sites of 5 or more units to provide a minimum of 20% of properties built to Lifetime Homes Standards and in addition, wheelchair user dwellings will be supported. Further, all residential development is to be built in accordance with identified space standards. The emerging layout for the Site ensures these space standards would be met, and whilst we support the provision of 20% Lifetime Homes Standard, we propose that 100% of the Site would be delivered to this standard, in line with ateb Group's commitments.	Letterston	HSG/053/LDP2/1.	Support welcomed. No change required.				No			

5.0 Policy GN 16 Residential Allocations

Representor Number	Representor	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
1597	Mr D Low		1	DP GN 16 Residential Allocations	Object	No	Propose additional candidate site for residential allocation. Land Agency CYM 156768 Name:: Field Adjacent 112 Hill Mountain Am attaching pdf copy of original LDP2 submission , {dated 20/02/2020. office reference 1597) Note that allotments identified on submitted map have now been replaced as a community space. The proposed site provides for residential/affordable housing within the sustainability objectives. The site is well located for access to services and will make a positive contribution to Sustainability Appraisal Objective 6. Drawings are provided with the original representation.	Hill Mountain	LDP2/Deposit2/ New Site 1			The amendment suggested is not supported by the Plan's evidence base.	The Candidate Site Assessment process identified a suitable site to allocate for housing in Hill Mountain.	No			

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1868	S Thomas, B William		2	DP GN 16 Residential Allocations	Object	No	Upon reviewing the LDP-2 I consider that candidate site reference 341 (name: Between Eirianea, Three Wells and Llwynhelig / Rhwng Eirianea, Three Wells a Llwynhelig) should be re-assessed and included as a site allocation within the LDP-2.The submitted site plan outlines the site measuring 5.25 hectares which is located immediately adjacent to the designated settlement boundary of LLandissilo. The settlement of Llandissilio has been designated as a 'Service Village' in the LDP2. These settlements have been categorised as offering "a good provision of services and facilities to meet the day to day needs of their population, but plays a more limited role for the wider population." The ethos underpinning National and Local Planning Policy is to encourage 'sustainable development'. In light of the settlements 'ranking' it is considered that the settlement can be considered sustainable where development should be encouraged as identified in Policy SP 9 of the LDP-2.	Llandissilio	Candidate Site 341		The housing provision is set out in detail in the Plan to respond to the Plan's housing requirement and it is considered to be sufficient without the need to consider further housing sites.		The Candidate Site 341 was considered in the Candidae Site Assessment and was rejected on the grounds that it is not well related to built form of settlement and also due to Highway and Trunk Road concerns. There is a housing allocation in the village which provides the level of growth appropriate for the settlement. Looking at broader issues, PCC has already identified sufficient land at Service Village level across its Plan area and the introduction of this further site would risk over-providing against the plan's strategy in that respect .	No			

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							It is noted that the Council aspire to concentrate the growth of this existing linear settlement in the centre. The proposed site represents the most logical extension to the existing settlement, at this village core, for the following reasons: · The site is bound by the defined settlement limit and brownfield land to the eastern boundary, transport links form the remaining boundaries which thereby curtail further expansion and represents a symmetry and completion to the existing settlement · The site is not considered to represent sporadic development into the open countryside but a location which, as existing, physically and visually relates more to the built form than the countryside. · The development of the site would not create further development site opportunities and is contained by long standing boundary features · The site naturally relates well to the settlement, is screened by natural mature vegetation on the southern and western boundaries									

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							· The site is sustainably located circa. 100-200 metres from the centre of the village and a number of bus stops. The site would benefit from footpaths to the village core and therefore offer a conducive and pleasant link for future occupiers to not rely on the private motor vehicle. · The site has a number of potential access points from the adopted highway. In order to achieve access a small section of the existing hedgerow would need to be removed, however, it is considered that this impact can be mitigated as part of any proposed residential scheme. The site can be accessed from the existing highway links which form the western and southern boundaries, with appropriate visibility splays being achievable. · The site is undeveloped and within Flood Zone A and has potential to incorporate a variety of SUDs so to ensure that existing surface water run off rates do not raise above the existing levels. · A sewerage pipe, water and electricity access points are easily accessible									

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							to be site. · The site has the ability to provide much needed housing at a logical and sustainable location which is in close proximity to the village core. · The Predictive Agricultural Land Classification (ALC) Map (Welsh Government) identifies the site as comprising Grade 3b (Moderate quality agricultural land) agricultural land. Best and most versatile (BMV) agricultural land is defined in Planning Policy Wales as Grades 1, 2 and 3a. Accordingly, it is considered that the use of this agricultural land for residential development is appropriate in this regard. It should be noted that the applicant has a track record of delivering housing and is willing and able to implement any future application promptly to deliver much needed housing at this sustainable and logical location. A location plan showing points of access is also included.									

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1943	C Pack (Idris Davies Ltd)	Asbri Planning (1510)	1	DP GN 16 Residential Allocations	Object	No	New Site - Yes – expanded site (please refer to Supporting Staement for full details) **Land West of Kings Park Farm, Templeton Candidate 278 (Site Allocation HSG/132/LDP2/1)** A 22 page supporting statement is provided which includes an introduction, a map showing the area requested for inclusion on page 4, a commentary on the site suitability and housing need considerations, the site's planning history, viability matters, deliverability considerations, planning policy review, an assessment in relation to sustainability objectives, consideration of wider planning context, an illustration of where the settlement boundary should be moved to and tests of soundness. Land registry information and an indicative layout is also provided.	Templeton	LDP2/Deposit2/ New Site 18		The housing provision is set out in detail in the Plan to respond to the Plan's housing requirement and it is considered to be sufficient without the need to consider further housing sites.		This site was not considered through the Candidate Site process. A total of 9 Candidate Sites were considered at Templeton. Several of the sites were considered appropriate for residential development but not allocated nor included in the Settlement Boundary as sufficient land has been allocated under Policy GN 16 (Residential Allocations) of the Plan (ref. HSG/ 132/LDP2/1 West of Kings Park Farm). This representation presents additional land for residential development, but it is not required during the Plan period.	No			

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2053	Mr L John	Llyr Evans Planning Ltd (34643)	1	DP GN 16 Residential Allocations	Object	No	The land owner would like to provide general support for the allocation (HSG/081/LDP2/1) and its reallocation following the LDP2 Deposit 1 representations. You will be aware that the southern part of the site (identified as commitment 081/LDP/01) has been sold to a developer and is largely complete, save for two frontage plots. Furthermore, New House (dwelling and yard area- Candidate site 202) has been sold to another developer, together with part of the allocation HSG/081/LDP2/1. It should however be noted that whilst the majority of the southern section (commitment 081/LDP/01) were affordable units, there would be an expectation for the majority of the allocation (HSG/081/LDP2/1) to provide for open market and the normal proportion of affordable units. The Trajectory set out in Policy GN.16 Residential Allocations, page 129 of the Deposit LDP2, where the site is identified as 100% Affordable, is therefore	Maenclochog	HSG/081/LDP2/1			The level of affordable housing requirement for this site will need to be re-evaluated in light of the consultation reponse.		Yes			FC5.GN16.Maenclochog.01

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							questioned. Given the sites location within the settlement boundary it is not clear why the development would consists solely of affordable units and this would be objected to as it would impact the viability and deliverability of the site. Its allocation on a 100% affordable housing basis would also seem inconsistent with other allocations throughout the plan. Therefore, whilst the allocation is welcomed, it is requested that the affordable housing requirement be reconsidered and brought in line with the usual affordable housing to open market proportion.										
2603	Dwr Cymru		21	DP GN 16 Residential Allocations	Comment	No comment	**HSG/040/LDP2/3 Rear of 76 Pembroke Road, Merlin's Bridge** 51 residential units A water supply can be provided for this site. The public sewerage network can accept the potential foul flows from the proposed development site. Merlin's Bridge Wastewater Treatment Works (WwTW) has limited capacity and the growth being proposed for	Haverfordwest & Merlins Bridge	HSG/040/LDP2/3	Comment noted. No change required.					No			

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							the catchment area will require improvements which would need to be funded through our Asset Management Plan (AMP) or potentially earlier through developer contributions.										
2603	Dwr Cymru		37	DP GN 16 Residential Allocations	Comment	No comment	**HSG/093/00066 East of Poppy Drive, Neyland 101** residential units A water supply can be provided for this site The public sewerage network can accept the potential foul flows from the proposed development site. Neyland Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed development site.	Neyland	HSG/093/00066	Support welcomed. No change required.				No			
2603	Dwr Cymru		38	DP GN 16 Residential Allocations	Comment	No comment	**HSG/088/LDP2/1 West of Bloomfield Gardens and North of Adams Drive & Highfield Park, Narberth** 89 residential units A water supply can be provided for this site Site is crossed by an abandoned water main and a 6” diameter watermain.The public sewerage network can accept the potential foul flows from the proposed development site. Narberth West Wastewater Treatment Works (WwTW) can accommodate the foul	Narberth	HSG/088/LDP2/1	Comment noted. No change required.				No			

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							flows from the proposed development site.										
2603	Dwr Cymru		40	DP GN 16 Residential Allocations	Comment	No comment	**HSG/030/LDP/01 East of Waunaeron, Crymych** 28 residential units A water supply can be provided for this site The public sewerage network can accept the potential foul flows from the proposed development site. Crymych WwTW can accommodate the foul flows from the proposed development site.	Crymych	HSG/030/LDP/01	Comment noted. No change required.				No			
2603	Dwr Cymru		41	DP GN 16 Residential Allocations	Comment	No comment	**HSG/048/00038 North of Hayston View, Johnston** 50 residential units A water supply can be provided for this site The public sewerage network can accept the potential foul flows from the proposed development site. Site is crossed by a 7" diameter sewer. Hook WwTW can accommodate the foul flows from the proposed development site.	Johnston	HSG/048/00038	Comment noted. No change required.				No			
2603	Dwr Cymru		42	DP GN 16 Residential Allocations	Comment	No comment	**HSG/048/LDP2/1 Maes yr Ysgol, Johnston** 13 residential units A water supply can be provided for this site The public sewerage network can accept the potential foul flows from the proposed development site. Site is crossed by a 150mm	Johnston	HSG/048/LDP2/1	Comment noted. No change required.				No			

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							diameter sewer.Hook WwTW can accommodate the foul flows from the proposed development site										
2603	Dwr Cymru		43	DP GN 16 Residential Allocations	Comment	No comment	**HSG/050/LDP2/1 South of Rock Park, Kilgetty** 19 residential units A water supply can be provided for this site The public sewerage network can accept the potential foul flows from the proposed development site. Langdon WwTW can accommodate the foul flows from the proposed development site	Kilgetty	HSG/050/LDP2/1	Comment noted. No change required.				No			
2603	Dwr Cymru		46	DP GN 16 Residential Allocations	Comment	No comment	**HSG/053/LDP2/1 Between Longstone Court and 62, St. Davids Road, Letterston 38 residential units** A water supply can be provided for this site The public sewerage network can accept the potential foul flows from the proposed development site. Letterston West WwTW can accommodate the foul flows from the proposed development site.	Letterston	HSG/053/LDP2/1	Comment noted. No change required.				No			
2603	Dwr Cymru		47	DP GN 16 Residential Allocations	Comment	No comment	**HSG/063/00024 North of The Kilns, Llangwm** 66 residential units A water supply can be provided for this site The public sewerage network can	Llangwm	HSG/063/00024	Support welcomed. No change required.				No			

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							accept the potential foul flows from the proposed development site. Llangwm WwTW can accommodate the foul flows from the proposed development site.										
2603	Dwr Cymru		48	DP GN 16 Residential Allocations	Comment	No comment	**HSG/122/00035 Awel y Mor extension, St Dogmaels** 28 residential units A water supply can be provided for this site. The public sewerage network can accept the potential foul flows from the proposed development site. The site is crossed by a 150mm diameter foul sewer, a 225mm surface water sewer, and a private culverted watercourse A scheme is currently being delivered at Cardigan WwTW, planned for completion by 31 March 2027. A Grampian planning condition would be required to prevent connection of the development site until the completion of the scheme.	St Dogmaels	HSG/122/00035	Comment noted. No change required.				No			
2603	Dwr Cymru		50	DP GN 16 Residential Allocations	Comment	No comment	**HSG/006/00003 Adjacent to Hafod, Blaenffos 6 residential units** A water supply can be provided for this site The public sewerage network can accept the potential foul flows from the proposed development site. Blaenffos WwTW can accommodate	Blaenffos	HSG/006/00003	Comment noted. No change required.				No			

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							the foul flows from the proposed development site.										
2603	Dwr Cymru		51	DP GN 16 Residential Allocations	Comment	No comment	**HSG/022/LDP2/1 Land at Dungleddy Court, Clarbeston Road** 19 residential units A water supply can be provided for this site The public sewerage network can accept the potential foul flows from the proposed development site. Clarbeston Road Wastewater Treatment Works (WwTW) has limited capacity and the growth being proposed for the catchment area may require improvements which would need to be funded through our Asset Management Plan (AMP) or potentially earlier through developer contributions.	Clarbeston Road	HSG/022/LDP2/1	Comment noted. No change required.				No			
2603	Dwr Cymru		53	DP GN 16 Residential Allocations	Comment	No comment	**HSG/029/00014 Opposite Woodholm Close, Crundale** 15 residential units A water supply can be provided for this site The public sewerage network can accept the potential foul flows from this site Merlin's Bridge Wastewater Treatment Works (WwTW) has limited capacity and the growth being proposed for the catchment area may require improvements which would need to be	Crundale	HSG/029/00014	Comment noted. No change required.				No			

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							funded through our Asset Management Plan (AMP) or potentially earlier through developer contributions.										
2603	Dwr Cymru		54	DP GN 16 Residential Allocations	Comment	No comment	**HSG/029/LDP2/1 West of Ashford Park, Crundale** 22 residential units A water supply can be provided for this site The public sewerage network can accept the potential foul flows from this site Site is in close proximity to Cardigan Slade Sewage Pumping Station (SPS) and the LPA may wish to contact their Environmental Health Department for their views on whether there is the potential for odour nuisance on the proposed allocation Merlin's Bridge Wastewater Treatment Works (WwTW) has limited capacity and the growth being proposed for the catchment area may require improvements which would need to be funded through our Asset Management Plan (AMP) or	Crundale	HSG/029/LDP2/1	Comment noted. No change required.			To note the comment includes reference to potential odour nuisance from the Cardigan Slade Sewage Pumping Station. This matter was followed up after the 2020 public consultation and is considered to be capable of mitigation.	No			

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							potentially earlier through developer contributions.										
2603	Dwr Cymru		55	DP GN 16 Residential Allocations	Comment	No comment	**HSG/043/LDP2/1 Adjacent to Brackenhurst, Hill Mountain** 15 residential units A water supply can be provided for this site The public sewerage network can accept the potential foul flows from the proposed development site. Llangwm WwTW can accommodate the foul flows from the proposed development site.	Hill Mountain	HSG/043/LDP2/1	Support welcomed. No change required.				No			
2603	Dwr Cymru		56	DP GN 16 Residential Allocations	Comment	No comment	**HSG/046/LDP2/1 Land at West End Cottages, Hundleton** 14 residential units A water supply can be provided for this site. Site is crossed by a 6” diameter watermain. The public sewerage network can accept the potential foul flows from the proposed development site. Hundleton WwTW can accommodate the foul flows from the proposed development site.	Hundleton	HSG/046/LDP2/1	Comment noted. No change required.				No			

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2603	Dwr Cymru		58	DP GN 16 Residential Allocations	Comment	No comment	**HSG/049/LDP2/1 East of Brookfield Close and West of Bridge Lane, Keeston** 27 residential units A water supply can be provided for this site The public sewerage network can accept the potential foul flows from the proposed development site. Site is crossed by a 300mm diameter sewer. Keeston Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed development site.	Keeston	HSG/049/LDP2/1	Comment noted. No change required.			To note that the site is crossed by a sewer, which will need to be taken into consideration in designing the layout for the site.	No			
2603	Dwr Cymru		59	DP GN 16 Residential Allocations	Comment	No comment	**HSG/060/LDP2/1 Adjacent to Maesybryn, Llandissilio** 26 residential units A water supply can be provided for this site. The public sewerage network can accept the potential foul flows from the proposed development site. Clynderwen Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed development site.	Llandissilio	HSG/060/LDP2/1	Comment noted. No change required.				No			
2603	Dwr Cymru		60	DP GN 16 Residential Allocations	Comment	No comment	**HSG/066/LDP2/1 East of Hazelbank, Llanstadwell** 10 residential units A water supply can be provided for this site. The public sewerage network can accept the potential foul flows from the proposed	Llanstadwell	HSG/066/LDP2/1	Support welcomed. No change required.				No			

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							development site. Neyland Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed development site										
2603	Dwr Cymru		61	DP GN 16 Residential Allocations	Comment	No comment	**HSG/081/LDP2/1 West of Globe Inn, Maenclochog** 15 residential units A water supply can be provided to serve the proposed development site. The public sewerage network can accept the potential foul flows from the proposed development site. Maenclochog WwTW can accommodate the foul flows from the proposed development site.	Maenclochog	HSG/081/LDP2/1	Comment noted. No change required.				No			
2603	Dwr Cymru		62	DP GN 16 Residential Allocations	Comment	No comment	**HSG/099/LDP2/1 Land at Coppins Park, Pentlepoir** 11 residential units A water supply can be provided for this site. The public sewerage network can accept the potential foul flows from this site. Site is crossed by a 225mm diameter surface water sewer. Site is located in close proximity to a Sewage Pumping Station (SPS) and the LPA may wish to contact their Environmental Health Department for their views on whether there is the	Pentlepoir	HSG/099/LDP2/1	Agree minor change needed.			In response to this issue highlighted by Dwr Cymru/Welsh Water the Public Protection Authority has suggested that an odour impact assessment be undertaken prior to development taking place. This information can usefully be added into the Development Sites and Infrastructure SPG for this residential allocation.	No			

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							potential for odour nuisance on the proposed allocation Tenby WwTW can accommodate the foul flows from the proposed development site.										
2603	Dwr Cymru		63	DP GN 16 Residential Allocations	Comment	No comment	**HSG/113/LDP2/01 South of Robeston Court, Robeston Wathen** 5 residential units A water supply can be provided for this site There are no public sewers in close vicinity to this site. The nearest public sewers are in Narberth. The nearest WwTW catchment is Narberth West	Robeston Wathen	HSG/113/LDP2/01	Comment noted. No change required.				No			
2603	Dwr Cymru		64	DP GN 16 Residential Allocations	Comment	No comment	**HSG/114/LDP/01 East of Pilgrim's Way, Roch** 52 residential units A water supply can be provided for this site The public sewerage network can accept the potential foul flows from this site. Site is crossed by a 100mm diameter foul sewer, 225mm diameter surface water sewers, and 100mm pressurised rising main sewer. Maes Ffynnon Sewage Pumping Station (SPS) is located on the site and the LPA may wish to contact their Environmental Health Department for their views on whether there is the potential for odour nuisance on the proposed	Roch	HSG/114/LDP/01	Comment noted. No change required.			To note that the site is crossed by a foul sewer, surface water sewers and a pressurised rising main sewer, which will need to be taken into consideration in designing the layout for the site. The Maes Ffynnon seweage pumping station is within the site and there is a potential for odour nuisance. All these matters will require suitable mitigation.	No			

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							allocation.Newgale Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed development site.										
2603	Dwr Cymru		65	DP GN 16 Residential Allocations	Comment	No comment	**HSG/119/LDP2/1 Between Cornerways and Austalise, Simpson Cross** 18 residential units A water supply can be provided for this site. Site is crossed by a 90mm diameter watermain. The public sewerage network can accept the potential foul flows from the proposed development site. Keeston Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed development site.	Simpson Cross	HSG/119/LDP2/1	Comment noted. No change required.			To note that the site is crossed by a water main, which will need to be taken into consideration in designing the layout for the site. Earlier constraints checking may have referenced a need to pump foul flows to Roch WwTW but that is no longer necessary as the site can drain to Keeston WwTW which has the necessary capacity.	No			
2603	Dwr Cymru		66	DP GN 16 Residential Allocations	Comment	No comment	**HSG/120/00018 Northwest of Wesley Way, Spittal** 10 residential units A water supply can be provided for this site. The public sewerage network can accept the potential foul flows from the proposed development site. Site is crossed by a 6” diameter sewer Spittal Wastewater Treatment Works (WwTW) can accommodate the foul	Spittal	HSG/120/00018	Comment noted. No change required.			To note that the site is crossed by a foul sewer, which will need to be taken into consideration in designing the layout for the site.	No			

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							flows from the proposed development site.										
2603	Dwr Cymru		67	DP GN 16 Residential Allocations	Comment	No comment	**HSG/123/LDP/01 North of Parsons Green, St Florence** 20 residential units A water supply can be provided for this site. Site is crossed by a 90mm diameter watermain. The public sewerage network can accept the potential foul flows from the proposed development site. St Florence Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed development site.	St Florence	HSG/123/LDP/01	Comment noted. No change required.				No			
2603	Dwr Cymru		68	DP GN 16 Residential Allocations	Comment	No comment	**HSG/132/LDP2/1 West of Kings Park Farm, Templeton** 14 residential units A water supply can be provided to serve the proposed development site. The public sewerage network can accept the potential foul flows from the proposed development site. Templeton Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed development site.	Templeton	HSG/132/LDP2/1	Comment noted. No change required.				No			

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2603	Dwr Cymru		69	DP GN 16 Residential Allocations	Comment	No comment	**HSG/135/LDP2/1 North of Bulford Road Bypass, Tiers Cross** 6 residential units A water supply can be provided for this site. Site is crossed by a 600mm diameter watermain. The requirement for a substantial easement width to protect the watermain on this small site may impact the achievable development density onsite.The public sewerage network can accept the potential foul flows from the proposed development site. Tiers Cross WwTW can accommodate the foul flows from the proposed development site.	Tiers Cross	HSG/135/LDP2/1	Agree focussed change needed.			The width of the easement required to maintain access to the water main makes the site unviable to develop. The allocation will therefore be deleted and the settlement boundary amended accordingly.	No			
2603	Dwr Cymru		70	DP GN 16 Residential Allocations	Comment	No comment	**HSG/149/LDP2/1 Land at Ford Farm, Wolfscastle** 14 residential units A water supply can be provided for this site. Site is crossed by a 3" diameter watermain. The public sewerage network can accept the potential foul flows from this site. Wolfscastle WwTW can accommodate the foul flows from the proposed development site.	Wolfscastle	HSG/149/LDP2/1	Comment noted. No change required.			To note that the site is crossed by a water main, which will need to be taken into consideration in designing the layout for the site.	No			
2973	JJ Evans & Sons	Llyr Evans Planning Ltd (34643)	1	DP GN 16 Residential Allocations	Object	No	The detailed submission comments on the Council's reasons for omitting the site from the settlement boundary. The Candidate	Croesgoch	Candidate Site 479		The amendment suggested is not supported		This representation relates to LDP 2 Candidate Site 479 at Croesgoch. The Candidate Sites Register and Site Assessment Report to support LDP 2, Deposit	No			

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							Site Assessment identifies, Highways, Archaeology and Agricultural Land Classification as reasons for omitting the site from the settlement boundary. It also includes a Sustainability Appraisal assessment in relation to SA Objectives. The submission also includes a site location plan and indicative layout Rev B. Also included is an Access Appraisal by ACSTRO.				by the Plan's evidence base.		Plan 2 identifies three constraints at the site, which in combination has led PCC to conclude that the site should not be allocated for residential purposes by LDP 2. These relate to highway access, archaeology and agricultural land classification respectively. All are matters that have been referenced in the Deposit Plan 2 representation, with further evidence provided. PCC was advised by its highway colleagues that the site had constraints which could be mitigated, the Dyfed Archaeological Trust (now Heneb) advised that mitigation would be required and the ALC category was shown to be 3a. Individually, these matters seem to be capable of mitigation, but in combination that seems to be quite a significant level of constraint, especially given the size of the village and the existence of a planning permission (listed in policy GN 17) for 22 dwellings which seems to provide sufficient for a settlement of this size and service provision for LDP 2. Looking ahead, the options for future development in this village may prove to be limited and further consideration may need to be given to this site when the Plan is next reviewed. It is also				

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													possible that it could (in part or whole) be brought forward as an affordable housing exception site should the anticipated delivery of the permitted site and other sites in the same housing market area in a timely manner.				
3134	H Merriman	Hugh Tribe (2149)	1	DP GN 16 Residential Allocations	Object	No	**HSG/132/LDP2/1 Opposite Templeton School -** exclude The allocated housing land shown in the draft LDP is not considered to be the best option. It will extend the village limits on the busiest road through the village (A4115). The site has no footpath access and street lighting and there is a long walk to the village school. Regardless of the aforesaid, it will only provide around 6 plots. Based on the current government's proposals for housing there will be a requirement for much more housing land and the village of Templeton should be a favoured option having a good village school, hall, public house and restaurant, places of worship and local places of employment and close access to other services at Narberth. The proposed site can provide up to 30 plots with close walking access to the school and	Templeton	HSG/132/LDP2/1			The housing provision is set out in detail in the Plan to respond to the Plan's housing requirement and it is considered to be sufficient without the need to consider further housing sites.	The site was considered through the Candidate Site process and a portion was included within the Settlement Boundary but not allocated as it would accommodate less than 5 dwellings which is the threshold for allocation. The remainder of the site was considered suitable for residential development but not needed as the site allocation HSG/132/LSP2/1 West of Kings Park Farm was considered more favourable.	No			

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							employment. There could be the prospect of providing a site for the nursery school (now looking for premises in the village) or additional parking for the school. This site also makes sense as it is opposite an existing residential estate and thus does not extend the village limit.										
3134	H Merriman	Hugh Tribe (2149)	2	DP GN 16 Residential Allocations	Comment	No comment	**Candidate Site 034 -** include - .HSG/132/LDP2/1 Opposite Templeton School - exclude The allocated housing land shown in the draft LDP is not considered to be the best option. It will extend the village limits on the busiest road through the village (A4115). The site has no footpath access and street lighting and there is a long walk to the village school. Regardless of the aforesaid, it will only provide around 6 plots. Based on the current government's proposals for housing there will be a requirement for much more housing land and the village of Templeton should be a favoured option having a good village school, hall, public house and restaurant, places of worship and local places of employment and close	Templeton	Candidate Site 034		The housing provision is set out in detail in the Plan to respond to the Plan's housing requirement and it is considered to be sufficient without the need to consider further housing sites.		Land has been allocated for residential development in Templeton (HSG/132/LDP2/1 West of Kings Park Farm) for 14 dwellings. The site in this representation (Candidate Site 034) was considered and partly included within the Settlement Boundary, although not allocated for residential use. The remainder of the site is considered appropriate for residential development but excluded from the Settlement Boundary as it is not required for this Plan period. The representation also includes an area within the site for possible parking for the school or nursery school. This element alone could be considered further through the planning application process should additional parking be required within the community.	No			

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							access to other services at Narberth. The proposed site can provide up to 30 plots with close walking access to the school and employment. There could be the prospect of providing a site for the nursery school (now looking for premises in the village) or additional parking for the school. This site also makes sense as it is opposite an existing residential estate and thus does not extend the village limit.										
4001	D Webb		2	DP GN 16 Residential Allocations	Object	No	CYM213119 The field 977 south west side of Ash lane Tavernspite.nr the soutern end junction with lime road. Oppersite the bungalows Four winds ty paranor Ahsbourne and Cairncroft. FIELD NUMBER 977.. i would like this area tobe included GN16 POLICY for devolpment resisdential planning.please. to include SP7. Site Notes:- Settlement name : Tavernspite (PM25) Proposal map ref. PM25 Field 374 at Tavernspite (PM25), has a burial chamber located in the field. Therefore, not allocated due to archaeological concerns.	Tavernspite	LDP2/Deposit2/New Site 21		The housing provision is set out in detail in the Plan to respond to the Plan's housing requirement and it is considered to be sufficient without the need to consider further housing sites.		The level of growth required during the Plan Period and the delivery of housing is set out in detail in the Housing Requirement Background Paper. Tavernspite is classed as a Service Village in Policy SP 6 (Settlement Hierarchy) of the Plan. This site was not submitted for consideration as a Candidate Site, Three other Candidate Sites were assessed at Tavernspite (refs, 134, 282 and 374). Site 282 was retained within the Settlement Boundary for Tavernspite but not allocated. Due to the size and shape of the site it is unlikely to accommodate more than 3 or 4 dwellings which falls below the threshold of 5 for allocation. Site 374 was also included within the Settlement Boundary but not	No			

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							I would like to include field number 977 into the SP7 AND GN16 Tavernspite settlement area for resisdential devolpment (PM25), as the area has easy access and no archaeological concerns. It would be perfect for a small development, including low cost environmentally-friendly housing, using water-conservation, renewable energy, smart technology, energy star appliances, reclaimed wood, natural lighting and ventilation. This would be a perfect development area for Tavernspite as it is small and perfectly located.it is oppersite four other bungalows.and could be set back from the road slightly to keep all excisting hedges and boundries. A Map showing the extent of the site proposed is included in the representation.						allocated due to there being archaeological interest within the site requiring further evaluation should a planning application come forward. A tumulus is present at the southern end of the site, although it is a large site and there remains potential for some residential development. Both these sites are well-related to the built form of the village. A third Candidate Site (134) was considered appropriate for residential development but excluded from the Settlement Boundary as the other Candidate Sites were ore appropriate. No further land is required for residential development at Tavernspite during the Plan period.				

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4002	Mr H Dyer		1	DP GN 16 Residential Allocations	Object	No	This site is unsuitable for a number of reasons. The proposed access to the site is via a single track road which is currently a cul-de-sac. This is a residential area with a large number of parked cars which belong to the residents. As such this makes this completely unsuitable for additional residential traffic, never mind construction traffic. There is a children's play park at the end of the road. This is frequently used by local children and as such any additional traffic (both construction and residential) will impact on their safety, health & well being. The infrastructure within Hazelbeach is not suited to additional traffic, either residential or construction. The village is narrow with tight access and is popular with walkers. These points alone have resulted in a previous planning application for an additional property in the garden of 5 Hazelbank being refused. This was for 1 property, let alone 10.	Llanstadwell	HSG/066/LDP2/1			The amendment suggested is not supported by the Plan's evidence base.		Candidate Site Assessment - CS.298. The Highway Authority (HA) advised that some development could be accomodated. As a result, it was agreed with the HA that less than half of the original candidate site would be allocated and at a reduced denisty of 10 dwellings per hectare (dph) rather than 23dph in other rural settlements. Also, the planning application for a new dwelling ref. 22/0029/PA to the rear of 7 Hazelbank was refused on amenity and affordable housing grounds, not highway access.	No			
4034	T Papps		1	DP GN 16 Residential Allocations	Object	No comment	I would like to state an objection to site number 085 North Bulford Road. In a previous objection we had	Tiers Cross	Candidate Site 085			The amendment suggested is not		The Council's Highway Department did not object to the CS.085 being allocated as HSG/135/LDP2/1. However, the	No			

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							noted that the traffic in the village and particularly on the road leading to site 085 and the junction that leads onto the main Tiers Cross road is totally unsuitable for more traffic. Considering that site 455 North Bulford Road will have a considerable amount of Specialist housing with support the traffic increase would be dangerous for existing residents. I would like to see where this has been taken into consideration when considering 085 as being suitable for more housing.				supported by the Plan's evidence base.		allocation is proposed for deletion, as the site is crossed by a water main that would require a significant easement to maintain access. It is therefore not viable to develop in this current form.				
4140	P & N Clarke		1	DP GN 16 Residential Allocations	Object	No	I wish to object to both plans due to increased construction and residential traffic which would overload already overcrowded single track roads. I am also extremely concerned that the existing infrastructure would be unable to cope with the increased requirement for parking, drainage, waste and water supply etc. The land, outside the village boundary, adjoins our house and garden, and I believe that both these proposals will adversely impact ourselves, other	Llanstadwell	HSG/066/LDP2/1		The amendment suggested is not supported by the Plan's evidence base.		Candidate Site Assessment - CS.298. The Highway Authority (HA) advised that some development could be accommodated. As a result, it was agreed with the HA that less than half of the original candidate site would be allocated and at a reduced density of 10 dwellings per hectare (dph) rather than 23dph in other rural settlements. Dwr Cymru have advised that a water supply can be provided to the site and that foul flows can be accommodated by the waste water treatment works at Neyland. Surface water drainage would be a matter addressed by any subsequent planning	No			

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							residents and local families who use the playpark.						application, as part of SuDS requirement.				
4160	Glenholme Developments	Harries Planning (4430)	1	DP GN 16 Residential Allocations	Object	No	A detailed submission is provided which sets out information on the proposed allocation in the Deposit Plan, the proposed site by the representor and a commentary on the soundness tests. Attached are a site plan, photographs of the site and approaches to the site and an outline planning permission dated 26th June 1981.	Llandissilio	LDP2/Deposit2/ New Site 23		The housing provision is set out in detail in the Plan to respond to the Plan's housing requirement and it is considered to be sufficient without the need to consider further housing sites.		This representation proposes an alternative site for inclusion in the settlement boundary for residential use, adjoining Llandissilio Settlement Boundary. This submission has come late in the LDP 2 plan preparation process, the site has therefore not been constraint checked through the Candidate Site assessment process. There is a housing allocation in the village and other areas of white land which provide the level of growth appropriate for the settlement. Looking at broader issues, PCC has already identified sufficient land at Service Village level across its Plan area and the introduction of this further site would risk over-providing against the plan's strategy in that respect. PCC is also concerned that introducing a completely new site to a rural settlement at this late stage in the process would not be ideal, as there has been no prior community consultation. As such, PCC would suggest that the best way forward is not to allocate this site through LDP 2 or place it in the Settlement Boundary, but rather to await the next Plan review, at which point it could be put forward for	No			

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													consideration through the Candidate Site process and be properly tested throughout the Plan process.				
4188	Wales & West Housing	Asbri Planning (4389)	7	DP GN 16 Residential Allocations	Support	No	In summary, these representations wish to fully support the Pembrokeshire RLDP Second Deposit Plan, including the allocation of HSG/088/LDP2/1 West of Bloomfield Gardens and North of Adams Drive & Highfield Park for a residential development under Policy GN 16 'Residential Allocations'	Narberth	HSG/088/LDP2/1	Support welcomed. No change required.				No			
4188	Wales & West Housing	Asbri Planning (4389)	8	DP GN 16 Residential Allocations	Object	No	A detailed submission is provided which requests that the delivery rate is increased and that this be reflected in Policy GN 16. A commentary on the tests of soundness is also provided.	Narberth	HSG/088/LDP2/1		The amendment suggested is already addressed by the Plan,. No change is needed.		The allocation figures set out in Policy GN 16 (Residential Allocations) provide an indication of the number of units anticpated to be delivered during the Plan period, including the percentage of affordable houses. The site allocated in the Plan (HSG/088/LDP2/1) at Bloomfield Gardens includes the area to accommodate the 64 additional houses beyond the Plan period. Due to the delays in	No			

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													preparing the Deposit Plan, all of the short-term and most of the medium term anticipated delivery dates set out in Policy GN 16 have passed. It is acknolwedged that there is a planning application currently awaiting approval (February 2025) following resolution from the Council to grant planning permission A planning application for 91 dwellings, including 28 affordable houses and 12 low cost home ownership houses (Ref 23/0654/PA) was granted permission at the end of March 2025. A further application for development of the remaining land within the overall allocation could come forward immediately following adoption of LDP2 (Programmed for May 2026 in the Delivery Agreement). Delivery of any houses built within the additional area could be considered as windfall developments. A Focussed Change is being proposed through a separate representation to amend the table heading of Policy GN 16 (Residential Allocations) to 'Expected Units in Plan Period' .				
4188	Wales & West Housing	Asbri Planning (4389)	9	DP GN 16 Residential Allocations	Object	No	A detailed submission is provided which requests a change to the affordable housing requirement. A commentary on the tests of soundness is also provided.	Narberth	HSG/088/LDP2/1		The amendment suggested is already addressed by the Plan,.		The allocation figures set out in Policy GN 16 (Residential Allocations) provide an indication of the number of units anticipated to be delivered during the Plan period, including	No			

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											No change is needed.		the percentage of affordable houses. The site allocated in the Plan (HSG/088/LDP2/1) at Bloomfield Gardens includes the area to accommodate the 64 additional houses beyond the Plan period. Due to the delays in preparing the Deposit Plan, all of the short-term and most of the medium term anticipated delivery dates set out in Policy GN 16 have passed. A planning application for 91 dwellings, including 28 affordable houses and 12 low cost home ownership houses (Ref 23/0654/PA) on the easterly part of the site was granted permission at the end of March 2025. A further application for development of the remaining land within the overall allocation could come forward immediately following adoption of LDP2 (Programmed for May 2026 in the Delivery Agreement). Delivery of any houses built within the additional area could be considered as windfall developments. A Focussed Change is being proposed through a separate representation to amend the table heading of Policy GN 16 (Residential Allocations) to 'Expected Units in Plan Period' .				

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4365	Belton & Son Ltd	Highlight Planning (4263)	1	DP GN 16 Residential Allocations	Object	No	HSG/049/LDP2/1 Candidate Site 316 and 317 Sound in part and not sound in part. A detailed submission is provided supporting the allocation of 27 houses but also asking for the site to be increased to the south. A detailed justification and mapping is provided.	Keeston	HSG/049/LDP2/1 Candidate Site 316 and 317		The amendment suggested is not supported by the Plan's evidence base.		The support noted for the residential allocation of CS 317 and part of the larger CS 316 is noted and welcomed. However, this representation asks for the residual element of CS 316 to be included in the allocation for residential purposes, noting that it is vacant wasteland, overgrown and with mounds of topsoil and some open storage of building materials and equipment. Essentially, this further area has been informally used for such purposes in conjunction with earlier phases of housing development at Keeston. The assertion is also made that this further land is deliverable. Reference is made in the representation to the identification of CS 316 as being in the SFCA yellow category, noting that the NRW DAM map does not identify it as land at risk from flooding. However, the more recent Flood Map For Planning identifies areas of small stream / surface water flooding on some of the parts of CS 316 that are not identified for development by LDP 2, Deposit Plan 2 and to note that FMFP is a material planning consideration. The conclusion reached is that the allocation of CS 317 and a part of CS 316 for residential purposes by LDP 2, Deposit Plan 2, is appropriate for the size and	No			

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													function of the settlement and avoids the issues that might arise on the parts of CS 316 affected by the small stream / surface water flooding issue.				
4368	Amity Planning (M Southall on behalf of Wales & West)		4	DP GN 16 Residential Allocations	Object	No	**2 Land at Nant Y Fyynnon, Letterston, Pembrokeshire, SA62 5SX:** This representation is accompanied by the following drawings and documents: - Site Representation Statement (240098SRS-01) - Site Location Plan and Context Plan (R521 - SK-20) - Site Constraints Plan (R521-SK-25) - Concept Site Plan (R521-SK-28A) - SWOT Analysis Plan (R521-SK-24) - Key Points Plan (R521 - SK-21) - Agricultural Land Classification Survey (December 2024) - Landscape Character & Visual Impact Assessment (TDA3015LC&VIARhC11.24) - Ecology Report Update (1963 002) - Transport Statement - Sustainability Appraisal (December 2024 – Rev 2) **Also referenced in the Comments Form: Page 50, Paragraph 4.32 Pages 124-130, Paragraphs 5.102-**	Letterston	LDP2/Deposit2/New Site 10		The amendment suggested is not supported by the Plan's evidence base.		Although submitted as an Alternative Site, this site was put forward at Candidate Site stage, albeit not by this representor. At Candidate Site stage, there were several other submissions asking for the site to remain in its current use. The residential proposal for the site was rejected on the grounds of it being Agricultural Land Classification grade 3a land and because it was in the SFCA yellow category. It is also worth noting that Letterston village already has committed residential sites and that an allocation has been identified elsewhere in the village. With regard to the ALC issue, the representor claims that the current grade is 3b, but this is not the case. Evidence has been provided to suggest that the land is grade 3b (which is cited as being a confirmation of the existing grade, but in fact is not so). The grade has not been formally changed. However, to note that most land adjacent to the existing built up area of Letterston is currently classified as grade 3a, so this site is not exceptional in that regard. The SFCA yellow category is a	No			

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							5.105 Proposal Map (PM09) Letterston (Inset Index Map 55)						constraint, but to note that the site is not classified as being at flood risk by the NRW DAM map. However, this is old evidence and the more recent Flood Map for Planning (a material planning consideration) identifies a small stream / surface water flooding issue running right across the site. This constraint makes the site less desirable for future development than those already committed / allocated by LDP 2. In the event that affordable housing supply is shown to be constrained in the village, it could potentially be brought forward as an exception site, as it lies adjacent to the Settlement Boundary. The proposer has indicated a willingness to consider such a proposal, albeit perhaps in the context of a 100% AH allocation rather than as an exception site.				
4368	Amity Planning (M Southall on behalf of Wales & West)		6	DP GN 16 Residential Allocations	Object	No	See Representation 5.	Eglwyswrw	LDP2/Deposit2/New Site 11		The housing provision is set out in detail in the Plan to respond to the Plan's housing requirement and it is considered to be sufficient without the		Although submitted as an Alternative Site, this site was put forward as a part of larger Candidate Site (CS 230) and was considered in the Candidate Site Assessment. Part of the original Candidate Site is now a housing commitment and has recently been completed. The rest of the site was rejected on the grounds that the site would provide an inappropriate level of growth within the settlement. This argument remains as the level of	No			

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											need to consider further housing sites.		growth required in the plan period has been met by the existing housing commitment. Looking at broader issues, PCC has already identified sufficient land at Service Village level across its Plan area and the introduction of this further site would risk over-providing against the plan's strategy in that respect.				
4368	Amity Planning (M Southall on behalf of Wales & West)		8	DP GN 16 Residential Allocations	Object	No	See Representation 7	Llandissilio	LDP2/Deposit2/New Site 12		The housing provision is set out in detail in the Plan to respond to the Plan's housing requirement and it is considered to be sufficient without the need to consider further housing sites.		This representation proposes an alternative site for an allocation for residential use, adjoining Llandissilio Settlement Boundary. This submission has come late in the LDP 2 plan preparation process, the site has therefore not been constraint checked through the Candidate Site assessment process. There is a housing allocation in the village and other areas of white land which provide the level of growth appropriate for the settlement. Looking at broader issues, PCC has already identified sufficient land at Service Village level across its Plan area and the introduction of this further site would risk over-providing against the plan's strategy in that respect. PCC is also concerned that introducing a completely new site to a rural settlement at this late stage in the process would not be ideal, as there has been no prior community consultation. As	No			

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													such, PCC would suggest that the best way forward is not to allocate this site through LDP 2 or place it in the Settlement Boundary, but rather to await the next Plan review, at which point it could be put forward for consideration through the Candidate Site process and be properly tested throughout the Plan process.				
4375	Morrillo	Evans Banks Ltd (1966)	1	DP GN 16 Residential Allocations	Object	No	A detailed submission is provided including a site layout plan, providing a site context, a description of the proposal, potential development overview, consideration by the LPA to date, a sustainability appraisal of the alternative site and a commentary on soundness and compatibility with the Plan strategy.	Hill Mountain	HSG/043/LDP2/1 & Candidate Site 424 (Part New Site 26)			Agree in part.	The suggested alternative site area would in part allow for a better internal site layout as it would fill a gap in the built form of the settlement along the main village road. However, using all of the suggested area would provide a disproportionate level of growth when compared to the size of village and result in a poor layout to the western extent of the site. Therefore a further alternative area is suggested for allocation, incorporating all of candiate site (CS)424 and 0.35Ha of the eastern area of new site reference 26. Candidate sites 422 and 425 would be removed from the allocated area. The candidate site register should be amended accordingly.	Yes	Yes		FC5.GN16.Hill Mountain.01 FC6.App2.Hill Mountain.01 FC4.SP07.Hill Mountain.01 ME14 & ME15

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4375	Morrillo	Evans Banks Ltd (1966)	2	DP GN 16 Residential Allocations	Object	No	See Representation 1. Please refer to representation made in relation to Land adjacent to Brackenhurst, Hill Mountain.	Johnston	HSG/048/00038		The amendment suggested is not supported by the Plan's evidence base.		Whilst there has been a long period of non-delivery circumstances have changed sufficiently for the site to continue to be allocated. Issues with the WwTW and the associated infrastructure prevented the residential allocation at this site from being delivered. Necessary upgrades have been undertaken and this constraint is lifted.	No			
4375	Morrillo	Evans Banks Ltd (1966)	3	DP GN 16 Residential Allocations	Object	No	See Representation 1. Please refer to representation made in relation to Land adjacent to Brackenhurst, Hill Mountain.	Neyland	HSG/093/00066		The amendment suggested is not supported by the Plan's evidence base.		The council are satisfied that whilst there has been a long period of non-delivery the circumstances have changed sufficiently for the site to continue to be allocated. One of the Registered Social Landlords (RSLs) operating in Pembrokeshire is understood to be interested in purchasing the site and has been in discussion with the landowner.	No			
4377	Ateb	Stantec(4376)	1	DP GN 16 Residential Allocations	Support	No comment	This current emerging plan (LDP2) allocates the development site for 38 dwellings as part of the wider LP goal for 6,245 new homes, including a 10% flexibility allowance, an approach which is supported as it represents good practice.	Letterston	HSG/053/LDP2/1.	Support welcomed. No change required.				No			

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4377	Ateb	Stantec(4376)	2	DP GN 16 Residential Allocations	Comment	No comment	The submission details 'Locational Background' and Technial Background for the site along with sections on Strategic Growth and Development Management. The submission includes Appendix A to D covering site concept and vision, historic environment desk based assessment, a geophysical survey and transport statement.	Letterston	HSG/053/LDP2/1.	Comment noted. No change required.				No			
4400	Kilvelgy Park Residents (Petition Lead 4399 Leadley)		1	DP GN 16 Residential Allocations	Object	No comment	I am writing in opposition to the proposed access to the building of a further 19 houses at Rock Park, Kilgetty. The reasons are as follows:- 1. We had lorries having to reverse to access the Rock Park site because the road width entrance from Carmarthen Road and Sardis Road up to Rock Park is compromised and lorries were frequently mounting pavements 2. The road along Kilvelgy Park has had to be repaired including pavements three times previously and it needs to be repaired now due to weight and excess traffic. 3. There is also much increased rainwater travelling both sides of the	Kilgetty	HSG/050/LDP2/1		The amendment suggested is not supported by the Plan's evidence base.		The Highway Authority has been contacted about the issues raised in this representation. They advise that the access of Rock Park and Kilvelgy Park are able to accomodate the additional traffic flows from housing allocation HSG/050/LDP2/1 South of Rock Park as it was designed to accept the additional development. Sufficient parking is provided within each plot to accommodate a minimum of 2 vehicles. The alternative access proposed by this representor is long and across undeveloped land unrelated to the allocated site. It would not be supported by the Highway Authority.				

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							road following the building of Rock Park. 4. Emergency services (ambulances and fire services) will not be able to get along Kilvelgy Park up to Rock Park in the event of an emergency. I would like to suggest an alternative access from Carmarthen Road. This would be behind Stepaside School with a road by the side of Meadow Gardens which at present is a grass bank. This would allow a straight run to Carmarthen Road with a quicker and shorter access to village amenities and avoiding the school entrance. The field at the rear of the school would not interfere with parents and children coming and going to the school.										
4416	No name provided	Gethin Beynon Planning (4416)	2	DP GN 16 Residential Allocations	Object	No	West of Globe Inn 201(HSG/081/LD P2/1)whilst the allocation is welcomed, it is requested that the affordable housing requirement be reconsidered and brought in line with the usual affordable housing to open market proportion. A detailed submission is provided.	Maenclochog	HSG/081/LDP2/1			The level of affordable housing requirement for this site will need to be re-evaluated in light of the consultation reponse.		Yes			FC5.GN16.Maenclohog.01

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4421	Defence Infrastructure Organisation (DIO)	Avison Young (4369)	2	DP GN 16 Residential Allocations	Object	No	Policy SP 2 (Housing Requirement) Policy GN 16 (Residential Allocations) Policy SP 7 (Settlement Boundaries)Not previously submitted as a Candidate Site but would like to add a new site allocation: **Land at Penally Training Camp, Barrack Road, Penally, SA70 7QW**. The detailed submission includes: a constraints plan; a copy of the DVM for alternative sites; Illustrative Master Plans Options 1,2,3.; site location plan; sustainability appraisal; viability assessment and a written representation.	Penally	LDP2/Deposit2/New Site 13		The housing provision is set out in detail in the Plan to respond to the Plan's housing requirement and it is considered to be sufficient without the need to consider further housing sites.		The level of growth required during the Plan Period and the delivery of housing is set out in detail in the Housing Requirement Background Paper. This is a large site measuring approximately 3.95ha. Development of the site at various densities has been proposed by the representor to accommodate from 118 dwellings to 188 dwellings which is a substantial number of new houses. Penally is classed as a Service Village in the Settlement Hierarchy of the Plan. No residential allocations have been made in the village but this is the same for several other Service Villages throughout the Plan area.				
4421	Defence Infrastructure Organisation (DIO)		3	DP GN 16 Residential Allocations	Comment	No comment	It is noted that site allocation HSG/132/LDP2/1 for 14 housing units is proposed adjacent to Templeton Training Area. Whilst MoD has no objection in principle to this allocation it should Templeton is an active training area where MoD uses blank ammunition, pyrotechnics and helicopters which may be audible to the occupants of the proposed dwellings on the proposed site and in line with the 'Agent of Change	Templeton	HSG/132/LDP2/1	Comment noted. No change required.				No			

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							Principle' MoD will not be held liable for any future disturbance caused.										
4439	B Hughes	Oochitecture (4438)	1	DP GN 16 Residential Allocations	Object	No	The proposed infill site is located within Templeton, immediately adjacent to the existing settlement boundary. The new site allocation proposes 9 plots with a mix of tenures, including: Market Housing (1no. four bed; 2no. three bed; 2no. two bed) Affordable Housing (2no. three/four bed; 2no. one/two bed). Inline with housing requirements as set out in Table A1 within the Local Housing Market Assessment - July 2021, the total number of new accommodation required in Templeton is 43,this additional site will allow for this target to be met within the next 13 years. Additionally, the proposed new site allocation is aligned with Table A2 requirements of market housing and affordable housing within Templeton, providing a mix of tenures and size of accommodation. A site plan is provided and a layout.	Templeton	LDP2/Deposit2/ New Site 31			The housing provision is set out in detail in the Plan to respond to the Plan's housing requirement and it is considered to be sufficient without the need to consider further housing sites.		This site was not considered through the Candidate Site process. A total of 9 Candidate Sites were considered at Templeton. Several of the sites were considered appropriate for residential development but not allocated nor included in the Settlement Boundary as sufficient land has been allocated under Policy GN 16 (Residential Allocations) of the Plan (ref. HSG/ 132/LDP2/1 West of Kings Park Farm). This representation presents additional land for residential development, but it is not required during the Plan period.	No			

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4444	Denmore Homes Ltd	LLyr Evans Planning Ltd (34643)	1	DP GN 16 Residential Allocations	Object	No	A new allocation is proposed. Land south of Evening Star Farm, Pentlepoir, Kilgetty, SA68 0QY. A detailed submission is provided outlining the lack of justification for removal of the land and commenting on the sustainability of the location and contribution Pentlepoir could make to the delivery of housing. Maps of the site and a layout is included.	Pentlepoir	LDP2/Deposit2/ New Site 30		The amendment suggested is not supported by the Plan's evidence base.		The planning permission referred to was granted after the base date of LDP2. The permission can be implemented and any amendment to the Settlement Boundary for Pentlepoir will need to be considered at the next review of the Plan.	No			
34449	Jones EN & VA	Llyr Evans Planning Ltd (34643)	1	DP GN 16 Residential Allocations	Object	No	Land west of Bromeini, Hermon, Glogue, Pembrokeshire. SA360EB Cyfeiriad y cais Site reference Candidate site reference 190: A detailed submission is provided commenting on the site that is allocated in the village (HS/042/00013), the housing provision for similar villages in the settlement hierarchy, the level of services and therefore the need for additional housing provision. Comments are also provided on the relationship of the site to the built form. A sustainability appraisal is provided along with a site location plan, an indicative layout, Dwr Cymru's response and Western Power correspondence.	Hermon	Candidate Site 190		The housing provision is set out in detail in the Plan to respond to the Plan's housing requirement and it is considered to be sufficient without the need to consider further housing sites.		The Candidate Site 190 was considered in the Candidate Site Assessment and was rejected on the grounds that a housing commitment in the village provided the level of growth appropriate for the settlement and is better related to built form by comparison. Looking at broader issues, PCC has already identified sufficient land at Service Village level across its Plan area and the introduction of this further site would risk over-providing against the plan's strategy in that respect. In the event that affordable housing supply is shown to be constrained in the village, it could potentially be brought forward as an exception site, as it lies adjacent to the Settlement Boundary.	No			

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34550	L Greggain & Co Ltd	GJPPlanning (4358)	3	DP GN 16 Residential Allocations	Object	No	• Object to the number of units and site area allocated; A detailed submission is provided regarding Land North of Hayston View, Johnston.	Johnston	HSG/048/00038				The section of woodland parrallel to Church Close meets the criteria to be designated as amenity open space. The remaining section measuring 0.95Ha covering part of the agricultural field does not meet the criteria and is recommended to be removed and added to housing allocation HSG/048/00038. The number of units to be delivered beyond the plan period will increase to 63 units to remain in line with GN.13 Residential Development which states that new homes on allocated sites in Services Centres that are 0.10 hectares and above will be built at a density of 23 dwellings per hectare.	Yes			FC5.GN16.Johnston.01FC5.GN51.Johnston.01
34550	L Greggain & Co Ltd	GJPPlanning (4358)	5	DP GN 16 Residential Allocations	Support	No	• General support for Policy GN16 and its provisions, and the intended allocation of the site	Johnston	HSG/048/00038	Support welcomed. No change required.				No			
34559	Mrs M Hay		1	DP GN 16 Residential Allocations	Object	Yes	Due to having developers interested in this site, I would really appreciate the timescale moving to the short term (ST). It is a long time since Coppins Park was completed and sighed off, and if Coppins Meadow Site No.019 were to move forward soon, then it would enhance Coppins Park. The services are as marked on plan ready to be linked up -	Pentlepoir	Candidate Site 019 & HSG/099/LDP2/1		The amendment suggested is already addressed by the Plan,. No change is needed.		The site proposed in this representation was not submitted for consideration as a Candidate Site. The Council considers that introducing a large site to a rural settlement at this late stage of the Plan process would not be ideal and it would be more appropriate to consider it through the next Review of the Plan when it can be fully considered and tested.	No			

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							Drawings are provided with original representation. This site if developed would enhance Coppins Park, link to future sites ready to attach on, I have tank in my land just off the pumping station. I have high interest from developers now, would like to move the timescale forward.										
34659	Hiraeth Developments	Llyr Evans Planning Ltd (34643)	1	DP GN 16 Residential Allocations	Support	No	A detailed submission is provided setting out the representor's support for the site's allocation. HSG/119/LDP2/1 Land between Cornerways and Austalise, Simpson Cross.	Simpson Cross	HSG/119/LDP2/1	Support welcomed. No change required.							
34713	Mr Llewellyn		1	DP GN 16 Residential Allocations	Object	No	I am asking for candidate site 252 to be incorporated into the LDP 2 plan. The site was classified Amber 4 at the candidate site stage being surplus to requirement. With the adjacent site 483 being developed I feel now there is a requirement for additional allocation within the Mascle Bridge settlement. Inclusion of site 252 would provide the inclusion of valuable amenity space alongside the carriageway and give the opportunity to relive parking pressure for existing housing stock, the site is also on a existing bus route	Mascle Bridge	Candidate Site 252		The amendment suggested is not supported by the Plan's evidence base.		Mascle Bridge is classified by LDP 2, Deposit Plan 2 as a Local Village (policy SP 6) and that policy and also SP 10 note that within this category, it is also identified as a Cluster Local Village. The reasoned justification to policy SP 10 elaborates on the Cluster Local Villages, explaining that they are Local Villages which when considered as a whole, provide some services, in relatively accessible locations, and reduce the need to travel. It is also noted that they have a functional link with a higher order centre (Service Centre or above) via a bus route into the settlement or have an active travel route option. In this case, the higher	No			

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							(SP10). The remainder of the site would be available for residential allocation having all services on or adjacent to site and would look to be delivered as soon as approved (SP7).						order centre is Neyland. Paragraph 4.54 (reasoned justification to SP 10) adds that for the Cluster Villages, small scale residential development will be permitted within Settlement Boundaries. Small scale housing sites are noted as being those capable of delivering between 1 and 5 dwellings within Settlement Boundaries, on land not allocated or protected for an alternative use. The scale of cumulative proposals is also recorded as a consideration. In this case, the Settlement Boundary for Mascle Bridge has been drawn to reflect its categorisation as a Cluster Local Village, with a part of Candidate Site 483 included within the Settlement Boundary for that reason. The Plan period started in 2017, so some of what the new Plan provides for in terms of small scale housing sites may well have already been developed by now, as is the case with a part of CS 483. Candidate Site 252, to which this representation refers, is a site of 0.54 hectares and is not needed to meet the housing requirement in this settlement during the Plan period. The Candidate Site assessment records that it is not well-related to the built form of the settlement, that an alternative site is available and				

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													that the level of development proposed is not required at this level of the settlement hierarchy. It is also recorded as being in ALC grade 2. For those reasons, it is not proposed for inclusion within the Mascle Bridge Settlement Boundary of LDP 2. The potential for the site to provide parking space to reduce pressure in the village is noted, but does not override the other planning considerations which suggest that it should not be included in the Local Village Settlement Boundary. However, should a need arise for Local Needs Affordable Housing in this village during the LDP 2 plan period, then the release of the part of the Candidate Site best related to the Settlement Boundary could be considered under the terms of policy GN 21.				
34719	Abbey Homes Limited	Atriarc Planning (34111)	1	DP GN 16 Residential Allocations	Object	No	A detailed submission is provided supporting the inclusion of candidate Site 268 Land off Leven Close, Hook, Pembrokeshire, SA62 4LF.	Hook	Candidate Site 268				In assessing this representation, it is important to: a) set the context in terms of the appropriate level of housing land supply for Hook village as a whole; b) having done that, consider whether a further residential site is needed in Hook for LDP 2; and c) to look at site-specific matters relating to Candidate Site 268 and whether, in the event that a residential allocation was needed, CS 268 would be appropriate.	Yes			FC5.GN17.Hook.01; FC6.App2.Hook.01; and OE24

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													Starting with a), Hook village is classified as a Service Village by LDP 2's Settlement Hierarchy and very often in such villages, a residential allocation will be appropriate. However, this is not invariably the case, as firstly there may be no suitable sites within such a village to host such an allocation and / or secondly there may be sufficient commitments in terms of previously permitted residential sites that are capable of delivery within the Plan period. In this case, there were various Candidate Sites put forward for residential purposes in Hook village and subsequently also an Alternative Site, but these have in each case not been found to be suitable for allocation, for reasons set out in the Candidate Site Register and Site Assessment Report. In terms of existing residential commitments, three sites in Hook village were considered to have extant planning permissions that were likely to contribute completed dwellings within the plan period. (It should be noted that the base date for considering the status of housing commitments for LDP 2, Deposit Plan 2 is April 2023). Specifically, there was one dwelling still to be built on the existing eastern arm of Leven				

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													Close (ref.040/00050), a further 4 dwellings remained to be built at Cyffin Barn Farm (ref.040/00063) and a 50% discount was applied to the remaining units at a site at Harcourt Close. In the latter case, due to non-delivery since 2012, it was concluded in 2024 that 14 dwellings were likely to be built in the LDP 2 Plan period, with a further 14 dwellings expected to be built beyond the plan period of LDP 2. On that basis, the Local Planning Authority would have considered allocating a site in addition to this level of existing commitment for LDP 2, Deposit Plan 2, to provide an appropriate level of growth at Hook village. No candidate sites were considered suitable, so no allocation was made. In the Housing Supply and Trajectory background paper (published in July 2024), a non-material amendment application is recorded, relating to the earlier planning permission at Harcourt Close. This provided sufficient confidence to include the Harcourt Close site, with a 50% discount provided for the within-plan-period element, as a commitment under policy GN 17 – Housing Commitments. (For information, the Housing Delivery Assessment for April 2024				

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													records eight completed units with a further two under construction). However, at the time of writing (May 2025), the Council's Housing Department has acquired 10 dwellings, with construction once more underway at the site. It is therefore concluded that this provides sufficient evidence to demonstrate that the entirety of the Harcourt Close can now be delivered within the plan period. Hence, a Focussed Change to policy GN 17 is proposed, which discards the 50% discount aspect at Harcourt Close and anticipates delivery of the whole Harcourt Close site within the LDP 2 Plan period. A consequential change to Appendix 2, Table C, is also needed. This level of units is considered to provide a sufficient level of growth over the plan period and there is no need to make a policy GN 16 residential allocation at Hook for LDP 2. Thus, on point b), the case for allocating CS 268 at Hook (or indeed other Candidate Sites or Alternative Sites in that village) for residential purposes is not substantiated in housing land supply terms. Setting that matter aside, it is nonetheless important to also consider whether, had a need been identified for a residential				

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													allocation in Hook village, Candidate Site 268 would have been an appropriate location for this – in other words, the point c), aspect. The representor references a meeting on 26/02/2020, at which the highway-related concerns identified earlier in the Plan process were contested. The representor understood that the highway concerns had been overcome, but notes that these have continued to be referred to in 2024, when Deposit Plan 2 was published for consultation purposes. Deposit Plan 2 does not allocate CS 268 for residential development and the Site Assessment Report continues to refer to highway access concerns. The representor notes that access through the existing development site is available and that the width of the road could be extended to further improve the access route. Reference is made by the representor to options available to alter or extend the current estate road. The representor is of the view that there has been a failure of procedure in terms of assessing evidence relating to highway access. Having looked into this matter, officers noted that the initial response from PCC highway colleagues was 'strongly				

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													object due to a significant constraint that cannot be mitigated'. Attempts to get clarification on this had not resulted in any revision to the original response by the time that LDP 2, Deposit Plan 2 was published for consultation purposes in autumn 2024, so there was no failure of procedure in that regard. However, officers have once again contacted highways colleagues following the objection received to Deposit Plan 2 in relation to this site. Further advice has now been provided, which notes that Leven Close is only partially adopted – specifically to the point where the road divides into two arms, one to the east, the other to the west. Neither of these arms has been adopted and it has been noted by highways colleagues that there is no apparent intention to adopt. It seems that the eastern arm of Leven Close has previously been inspected by PCC highways, but there were many issues that would have needed to have been addressed to move it forward to adoption. Hence this element of Leven Close has remained a private road. Highway colleagues have also noted that there would need to be both an inspection of the current road by PCC prior to any adoption and potentially further				

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													works to be undertaken prior to the first occupation of any additional development. Even assuming that was achieved, the maximum number of dwellings that might be possible, in addition to what already exists, is stated by highway colleagues to be likely to be around 20. There are some other matters that also require consideration before concluding on this representation. Firstly, reference is made to the agricultural land category of CS 268, which the representor states is limited. Reference is made by the representor to it being ALC grade 4 with potential to move to grade 3B. The Welsh Government / DataMapWales mapping suggests the higher grade 3a for much of the site, which places it in the BMV category. It is noted that much of the site was cleared in conjunction with drainage works by the water company (DCWW). An ecological assessment has been provided and to note that the drainage works undertaken may have had some impacts on this site. The site is in a former coal mining area. The representor has previously indicated a willingness to submit a Coal Mining Assessment, or something similar, to PCC but does not seem to have done so,				

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													either in the 2024 representation or following the earlier 2020 consultation on Deposit Plan 1. This is a matter that would need to be further considered before CS 268 could be considered for development purposes, although initial indications suggest that there are no known mine entries on the site. There is also a local flood risk aspect to take into account, as part of the site is in a flood zone for surface water / small watercourses, as shown on Flood Map for Planning. PCC's own SFCA for LDP 2 identifies elements of the site as being in the yellow category for surface water flood risk. To conclude, PCC is of the view that, in spite of the Service Village classification of Hook village, the level of residential commitments is such that a residential allocation is not required for LDP 2. In addition, Candidate Site 268 has been found to be constrained in terms of highway access, although a re-assessment by highway colleagues suggests if the constraints could be overcome, a limited amount of additional residential development might be possible. With further consideration of ALC matters, surface water flooding and historic coal mining also				

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													seemingly needed, site deliverability is currently in some doubt. However, it is suggested that, with further work, the site could potentially be re-presented at the next Plan review. The consideration of this representation has led to a re-appraisal of aspects of policy GN 17 at Hook, together with the housing trajectory appendix and to amend the Candidate Site register for CS 268 to record additional constraints. The Focussed Change references are FC5.GN17.Hook.01, FC6.App2.Hook.01 and OE24 respectively.				
34758	Eglwyswrw C Council		1	DP GN 16 Residential Allocations	Object	No comment	Map 1 (see original representation) This illustrates the current allocation as per built of 23 units in 2024.Map 2 Referring also to the site in the Candidate Site Register as **Site 230 green** – Has been built in 2024 as a part exception site with a 100% social housing allocation occupied for local needs. **Site 230 amber** – To support the site to be included within the LDP 2 general housing allocation of medium density . We do so, as otherwise this site could once again become an exception site allocated for a 100%	Eglwyswrw	Candidate Site Reference 230 Amber		The housing provision is set out in detail in the Plan to respond to the Plan's housing requirement and it is considered to be sufficient without the need to consider further housing sites.		Candidate Site 230 was considered in the Candidate Site Assessment. Part of the original Candidate Site is now a housing commitment and has recently been completed. The rest of the site was rejected on the grounds that the site would provide an inappropriate level of growth within the settlement. This argument remains as the level of growth required in the plan period has been met by the existing housing commitment. The remaining part of the Candidate Site would only be approved as an exception site if there was considered to be an affordable housing need in the locality. Looking at broader issues, PCC has already	No			

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							affordable or social housing. Having a new built site of 23 100% social homes in 2024, we believe the demand for a similar development is not sustainable in the context of homes for local people. We would OBJECT to allocating this site with a further social homes allocation. We believe this site should be developed to offer mix development of self-build, private sole tenure and a small element of affordable homes under a rent buy arrangement. This offer would provide opportunity for individuals who wish to reside in Eglwyswrw to achieve their first step on the housing ladder. It would also allow individuals the opportunity to occupy a home in Eglwyswrw who would not usually qualify to be listed on the social housing waiting list.						identified sufficient land at Service Village level across its Plan area and the introduction of this further site would risk over-providing against the plan's strategy in that respect.				

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34758	Eglwyswrw C Council		2	DP GN 16 Residential Allocations	Support	No comment	**Site 232 Red** – We would not support this allocation as we consider that it would be inappropriate in scale and proven need is not met. We further believe it would constitute overdevelopment within a service village with limited support services. Map 2 provided with the original representation.	Eglwyswrw	Candidate Site Reference 232	Support welcomed. No change required.				No			
34862	L Morgan	S Leaver, Powells (4162)	1	DP GN 16 Residential Allocations	Object	No	The intention of the representation is to set out an alternative candidate site for proposed inclusion as a draft allocation within the emerging LDP. We shall pick up further discussions with the LDP team in the New Year as to how we can progress further to include this site within the RLDP proposals.Land at Haverfordwest (As per the enclosed representations: Proposed Alternative Site of 21.44 Acres of Land at St David's Road, Haverfordwest including Sustainability Appraisal. A detailed submission is provided covering key concerns with the Deposit Plan , outlining a proposal for a 21.44 acre site as an alternative site for residential development. A	Haverfordwest & Merlins Bridge	LDP2/Deposit2/ New Site 14		The amendment suggested is not supported by the Plan's evidence base.		This site lies on the northern edge of Haverfordwest, close to the St. David's Road roundabout. It was not submitted as a LDP 2 Candidate Site. It proposes the residential development of 21.44 acres (8.67 hectares) of primarily agricultural land. A Sustainability Appraisal has been provided. The site is put forward as a logical and relatively unconstrained alternative to sites allocated by LDP 2, Deposit Plan 2 (but noting that while delivery concerns relating to allocated sites are alluded to, there is no further information on where these undeliverable sites are located or why they are not considered to be deliverable). A site of this size, developed at the expected density for a town site of 30dph, would be capable of delivering 260 dwellings. LDP 2, Deposit Plan 2, already provides deliverable housing allocations	No			

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							site map is included along with a satellite photo and a site report providing information including planning data, constraints, land registry info and property prices in the vicinity. **Will speak at the Examination if required.**						at the former Community Education Centre, Dew Street (22 dwellings), Slade Lane (330 dwellings in the Plan period and another 680 dwellings beyond) and at the rear of 76, Pembroke Road, Merlins Bridge (51 dwellings). There are also housing commitments listed on a variety of further sites at Haverfordwest in policy GN 17. Notwithstanding historic delivery difficulties at Slade Lane, there is evidence to show that the provisions of LDP 2, Deposit Plan 2 are sufficient to meet the needs of the current Plan period. In saying that, attention is drawn to the fairly recent changes in ownership affecting much of the Slade Lane land, with Pobl housing association and Welsh Government now major landowners and work underway to prepare a detailed Masterplan for the site. Therefore this alternative site at the St. Davids Road is not currently required. Other points to mention are that the site is spatially inferior to that at Slade Lane (particularly its southern elements) with regard to access to the services and facilities in the town centre and that there is a major woodland belt along the southern edge of the site (associated with a stream corridor) plus strong hedgerows within the site with				

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													mature hedgerow trees. The ALC grade seems to be mostly 3B.				
34862	L Morgan	S Leaver, Powells (4162)	2	DP GN 16 Residential Allocations	Object	No	**Land at Hook:** These representations are made in respect of the Draft Local Development Plan (LDP) for Pembrokeshire. This submission provides comments on the current draft, focusing on the proposed Allocations for housing in Pembrokeshire. These representations propose an alternative site of approximately 9.71-acre at Hook. The submission highlights the site's deliverability, sustainability, and alignment with LDP objectives, making the case for its inclusion as a residential allocation in the emerging plan. These representations include a Sustainability Appraisal within Appendix 1.	Hook	LDP2/Deposit2/New Site 15			The housing provision is set out in detail in the Plan to respond to the Plan's housing requirement and it is considered to be sufficient without the need to consider further housing sites.		This site is located in the countryside beyond Hook village, but in a location that is reasonably close to the core of the village. It was not submitted as a LDP 2 Candidate Site. There is no previous planning history under PCC. It proposes the residential development of 9.71 acres (3.93 hectares) of agricultural land. A Sustainability Appraisal has been provided. The site has been put forward on the basis that there is no residential allocation in this village, in spite of its Service Village status, and that it is unconstrained in terms of environment and infrastructure. Reference is made to the availability of highway access, the local bus service provision and its location outside a flood risk area. A site of this size, developed at the expected density for a village site of at least 23 dwellings per hectare, would be capable of delivering 90 dwellings or more.	No			

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													Although Hook village does not have a LDP 2, Deposit Plan 2 residential allocation, there are various existing residential commitments recorded in the village (as recorded in policy GN 17). While noting that this site is relatively unconstrained, it is in a former coal mining area and there is no Coal Mining Assessment provided. Most of the land is in ALC Grade 3A, so within the Best and Most Versatile land classification. Introducing a new residential development allocation with a potential to hold 90 dwellings, possibly more, to a rural village at this late stage in the Plan process is not considered to be a good approach. It will have bypassed the detailed assessments carried out for Candidate Sites and the local community will not have had an opportunity to make their views known. Also, the housing provision to meet the Plan's housing requirement is considered to be sufficient for the LDP 2 plan period, without the need to consider a substatial allocation at this village site. Notwithstanding the lack of a policy GN 16 residential allocation in this Service Village, it would seem best to defer further				

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													consideration of this site until a successor Plan, when it could be put forward at Candidate Site stage and properly evaluated in the context of the need identified at that time. Should a need arise for affordable housing during the LDP 2 plan period, then the part of the site best related to the Settlement Boundary could potentially be considered under the Exception Sites for Local Needs Affordable Housing policy (GN 21).				
34862	L Morgan	S Leaver, Powells (4162)	3	DP GN 16 Residential Allocations	Object	No	**Land at Llangwm, Pembs** (As per the enclosed representations)This submission provides comments on the current draft, proposing the 6.67 acre site-The submission highlights the site's deliverability, sustainability, and alignment with LDP objectives, making the case for its inclusion as a residential allocation in the emerging plan. These representations include a Sustainability Appraisal within Appendix 1. A site map is included along with a satellite photo and a site report providing information including planning data, constraints, land registry info and property prices in	Llangwm	LDP2/Deposit2/New Site 16			The amendment suggested is not supported by the Plan's evidence base.		Allocation reference HSG/063/00024 provides a sufficient level of growth for the village of Llangwm.	No			

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							the vicinity. acre site at Llangwm. **Will speak at the Examination if required.**										

5.0 Policy GN 17 Residential Commitments

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1894	South Meadow Homes	G Thomas (1536)	2	DP GN 17 Residential Commitments	Object	No	**Policy GN17. Ommission of Barnlake Point Phase 2: Barnlake Inset Candidate Site 016. D.M. Ref 154/00001 Background Paper "Housing Supply and Trajectory" July 2024 BARNLAKE POINT** CANDIDATE SITE SUBMISSION SUMMARY Barnlake Point Phase is possibly the last part of the publicly promoted redevelopment of a large brownfield neighbourhood at Westfield Pill,	Barnlake	Candiate Site 061	Agree focussed change needed.			Following the public consultation of Deposit Plan 2, application reference 24/0651/CL granted a certificate of lawful development 13/03/2025, which confirmed on the balance of probability that the residential development lawfully commenced prior to the expiry of the outline planning permission ref. 18/0219/PA and approval of reserved matters ref. 18/0511/PA and that any further development associated with the planning	Yes			FC5.GN17.Barnlake.01

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							Neyland. A successful public/private initiative has achieved the redevelopment of a redundant Railway Terminus, Ship building yard and Railway track. In their place are a 420 berth Marina, extensive industrial/employment units, an 11 acre nature reserve, self built housing, a speculative housing development, a long distance footpath and cycleway etc. The County Council and the Crown Estate sold Phase Two (Final) following a competitive Tender and Developer presentation. We have been granted Outline Planning Permission for Residential Development. Extensive Survey Reports have been prepared. The Reserved Matters Application is being worked up as I write and should be submitted shortly. A start on site is envisaged once all clearances obtained. The Local Development Plan Manual confirms extant planning permissions for all sites (above a threshold) to be shown on the Proposals Map. We assume the subject site is sufficiently important to inform the plan users and Policy makers. We look forward to receiving formal support for this brownfield housing development. PLANNING UPDATE 29.8.19 Reserved Matters approved for 22 houses Ref 18/0511/PA 2019 – 2021 Extensive						permission would be lawful. On the basis that appendix 2 table C of Deposit 2 Plan has a base date of 01/04/2023 and the development commenced prior to 29/08/2021, a focussed change is required to recognise this extant planning permission as part of the housing supply and add it to the list of sites contained in GN 17 Residential Commitments. However, the methodology used in section 7 of the background paper 'Housing Supply and Trajectory' (July 2024) must be applied. It is considered that the site should have a 50% discount applied because at the time of writing, no progress had been made since 2021 when a garage associated with one of the plots was constructed. This would be in line with other sites listed in table 4 of the aforementioned paper.				

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							pre-commencement conditions discharged. 16.6.21 Development commenced. Notice and evidence sent to Case Officer and Head of Planning by recorded delivery. 2.10.24 Certificate of lawfulness application submitted. Ref 24/0651/CL for completeness. DEVELOPMENT PROGRAMME South Meadow Homes are currently working on housing developments in Pembroke (178 to date) and at Pembroke Dock (152 to date). They intend to progress Barnlake within the LDP2 period. CONSULTATION This important brownfield residential development has been downgraded in the Deposit Plan without ANY consultation with South Meadow Homes! PROPOSAL The site to be reallocated within Policy GN17 to accurately record housing supply statistics. **Satellite pictures, layout plan, water mains and pumping station map, included in the representation.**										

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4377	Ateb	Stantec(4376)	9	DP GN 17 Residential Commitments	Comment	No comment	GN17 Residential Commitments reflects the allocation on the neighbouring land to the west at Parc Maen Hir, providing 100% affordable housing (26no units), which has been referred to as Phase 2. We would welcome clarification as to whether this development is taken into account within the LHMA need for 9 affordable housing units within the plan-period.	Letterston	053/00034	Comment noted. No change required.			It is assumed that the latest planning permission at Parc Maen Hir, Letterston, would have been picked up by the LHMA 2021, on the basis that the planning permission was issued on 20/09/2020 and work on the LHMA 2021 did not get underway until early in 2021.	No			
4377	Ateb	Stantec(4376)	10	DP GN 17 Residential Commitments	Comment	No comment	In our opinion, the long and convoluted planning history, spanning over 30 years and the site's allocation in consecutive development plans as well as a complete lack of information demonstrating the site is fully deliverable, means the site should be reconsidered as a 'residential commitment' for Letterston, allowing more deliverable sites to come forward and provide additional housing supply for the village. More detail is proviced in the detailed submission explaining this conclusion.	Letterston	053/00009		The amendment suggested is not supported by the Plan's evidence base.		The comments made with regard to delivery are noted. Phase 1 of the Court Meadow development was completed some time ago. The phase 2 land was sold by one private developer to another and there was a requirement built into the sale requiring development within a certain time period, to which the buyer has not adhered. The matter has been to court and the conclusion found in favour of the original owner, who now has control once more. The planning permission is capable of re-activation and indeed there were non-material amendment and variation of condition applications approved during 2024 relating back to an earlier planning permission (10/0924/PA).	No			
2603	Dwr Cymru		10	DP GN 17 Residential Commitments	Comment	No comment	**GN17 Residential commitments** We note that these sites already benefit from planning permission, and we will have made representations during the planning application consultation			Comment noted. No change required.				No			

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							process. If capacity does not exist within our infrastructure to accommodate the demands arising from a development site, the planning authority can make planning permission conditional upon there being adequate infrastructure available to cater for the development. A developer has a right to connect to our networks provided that a development site benefits from planning permission and there is no overriding planning condition attached to that permission that controls the location or timing of that physical connection.										

5.0 Policy GN 18 Slade Lane, Haverfordwest – S/HSG/040/LDP2/6

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4414	Pobl		1	DP GN 18 Slade Lane, Haverfordwest – S/HSG/040/LDP2/6	Support	Yes	Detailed statement of support for the Slade Lane allocation.	Haverfordwest & Merlins Bridge	S/HSG/040/LDP2/6	Support welcomed. No change required.				No			
2603	Dwr Cymru		11	DP GN 18 Slade Lane, Haverfordwest – S/HSG/040/LDP2/6	Comment	No comment	**S/HSG/040/LDP2/6 Slade Lane (GN 18) Haverfordwest** 330 residential units A hydraulic modelling assessment (HMA) will be required to determine the point of connection to the water supply network and potential developers would be expected to fund investigations during preplanning stages. The findings of the HMA would inform the extent of any necessary upgrades. Site is crossed by a 7" diameter water main and an 18" diameter raw water main. The public sewerage network can accept the potential foul flows from the proposed development site. Merlin's Bridge Wastewater Treatment Works (WwTW) has limited capacity and the growth being proposed for the catchment area will require improvements which would need to be funded through our Asset Management Plan (AMP) or potentially earlier through developer contributions.	Haverfordwest & Merlins Bridge	S/HSG/040/LDP2/6	Comment noted. No change required.			To note that the site is crossed by a water main and a raw water main, which will need to be taken into consideration in designing the layout for the site. Also to note, the need for a Hydraulic Modelling Assessment.	No			

5.0 Policy GN 23 Specialist and Supported Accommodation Allocations

Representor Numbe	Representor	Agent	Representation.	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit.	Other Edit No.	See Focussed Change (FC) No.
34426	Park House Court Ltd	Halsall Lloyd Partnership (1640)	2	DP GN 23 Specialist and Supported Accommodation Allocations	Support	No	We fully support the inclusion of land to the south and west of Park House Court for specialist and supported residential accommodation as part of of a cohesive continuing care provision as per planning approval 22/0289/PA in accordance with policy GN23 Specialist and Supported Accommodation Allocations	New Hedges	Candidate Site 153 SSA/089/01	Support welcomed. No change required.				No			
4409	Pembrokeshire Living Ltd	Lichfields (4409)	11	DP GN 23 Specialist and Supported Accommodation Allocations	Support	Yes	Draft policy GN 23 allocates four sites for specialist and supported accommodation; two in Tenby, one in Narbeth and one in Tiers Cross. These sites will make a contribution towards meeting an identified need (as set out in the supporting text (paragraph 5.124 through to 5.128) of policy GN 22). There are, however, only four proposed allocations, all of which are focused on the provision of facilities with a higher level of care. However, paragraph 5.129 of the emerging plan states that there is a substantial need in Pembrokeshire. These four sites will therefore not meet the identified need in full. No further provision is made to address the significant need for housing for older people in the emerging plan. This serves to reinforce why emerging policy GN 22 is essential.			Support welcomed. No change required.				No			
2603	Dwr Cymru		73	DP GN 23 Specialist and Supported Accommodation Allocations	Comment	No comment	**SSA/089/01 Southwest of Park House, New Hedges, Tenby** (extra care for older people) Site has planning permission, 15/1224/PA	Countryside	SSA/089/01	Comment noted. No change required.				No			
2603	Dwr Cymru		74	DP GN 23 Specialist and Supported Accommodation Allocations	Comment	No comment	**SSA/089/LDP2/01 East of Park House, New Hedges, Tenby** (residential/nursing) A water supply can be provided to serve the proposed development site. The public sewerage network can accept the potential foul	Countryside	SSA/089/LDP2/01	Comment noted. No change required.				No			

Representor Numbe	Representor	Agent	Representation	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit	Other Edit No.	See Focussed Change (FC) No.
							flows from the proposed development site. Tenby WwTW can accommodate the foul flows from the proposed development site.										
2603	Dwr Cymru		75	DP GN 23 Specialist and Supported Accommodation Allocations	Comment	No comment	**SSA/135/LDP2/01 North of Bulford Road Bypass, Tiers Cross** (care facility) A water supply can be provided to serve the proposed development site. Site is crossed by a 450mm diameter watermain. The public sewerage network can accept the potential foul flows from the proposed development site. Tiers Cross WwTW can accommodate the foul flows from the proposed development site.	Tiers Cross	SSA/135/LDP2/01	Support welcomed. No change required.				No			
2603	Dwr Cymru		76	DP GN 23 Specialist and Supported Accommodation Allocations	Comment	No comment	**SSA/088/LDP2/01 Redstone, Narberth (care facility)** A water supply can be provided to serve the proposed development site. There are no public sewers close to this site. The nearest public sewers are in Narberth. The nearest WwTW catchment is Narberth West.	Narberth	SSA/088/LDP2/01	Comment noted. No change required.				No			

5.0 Policy GN 27: Broadband and Telecommunications on New Developments

Representor Number	Representor Name	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
4393	Welsh Government Place Division, Housing and Regeneration Directorate	Lichfields (4394)	12	DP GN 27: Broadband and Telecommunications on New Developments	Support	Yes	Detailed submission of support provided.			Support welcomed. No change required.				No			

5.0 Policy GN 28 Protection and Enhancement of the Historic Environment

Representor Number	Representor	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC)
1507	Welsh Government		15	DP GN 28 Protection and Enhancement of the Historic Environment	Comment	No comment	**Historic Environment** Section 5.148 refers to the Historic Environment (Wales) Act 2016 and this has now been replaced by the Historic Environment (Wales) Act 2023. Also, sections 5.148 and 5.153 refers to Scheduled Ancient Monuments, they should refer to scheduled monuments, especially as the 2023 Act does not mention Ancient Monuments at all			Agree minor change needed.			Amend the second and third sentences of paragraph 5.148 as follows: Areas and sites of national significance are protected by national policy, including Listed Buildings, Conservation Areas, Scheduled ~~Ancient~~ Monuments, Landscapes of Historic Interest and Historic Parks and Gardens. The Historic Environment (Wales) Act ~~2016~~ 2023 has introduced new measures for the positive management of change in the historic environment.	Yes	ME1		

5.0 Policy GN 29 Community Facilities

Representor Number	Representor Name	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
1555	The Theatres Trust		2	DP GN 29 Community Facilities	Support	Yes	We support the promotion and protection afforded to community facilities through Policy GN29. We welcome amendment in line with our previous comments to make it clear this policy also applies to theatres of which there are a number within Pembrokeshire such as Theatre Y Gromlech in Crymych, Theatre Gwaun in Fishguard, Torch Theatre in Milford Haven, and Span Arts in Narbeth. These facilities provide opportunities for local people and groups to come together and participate in the arts. They contribute towards social and cultural well-being.			Support welcomed. No change required.				No			

5.0 Policy GN 30 Community Facility Allocations

Representor Number	Representor Name	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
2603	Dwr Cymru		81	DP GN 30 Community Facility Allocations	Comment	No comment	**CF/040/01 New Primary School, Slade Lane, Haverfordwest** A water supply can be provided for this site. Site is crossed by an 18" diameter raw water main that would require a significant easement. The public sewerage network can accept the potential foul flows from the proposed development site. Merlin's Bridge Wastewater Treatment Works (WwTW) has limited capacity and the growth being proposed for the catchment area may require improvements which would need to be funded through our Asset Management Plan (AMP) or potentially earlier through developer contributions.	Haverfordwest & Merlins Bridge	CF/040/01	Comment noted. No change required.			To note that a raw water main crosses the site, which will need to be taken into consideration in designing the layout for the site. As the precise location for the new school is not shown on the LDP 2 Proposals Map, it is possible that DCWW is assuming that the development will take place on the site previously identified for that purpose, which might prove to be incorrect.	No			
4393	Welsh Government Place Division, Housing and Regeneration Directorate	Lichfields (4394)	13	DP GN 30 Community Facility Allocations	Support	Yes	Detailed submission of support provided.			Support welcomed. No change required.				No			

5.0 Policy GN 31 Town Centre and Local Retail Centre Development

Representor Number	Representor	Agent	Representation :	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
4328	Mr & Mrs Moore		1	DP GN 31 Town Centre and Local Retail Centre Development	Support	Yes	I agree with the reduction in the number of properties in the centre of town that can only be shops and the alike and the presumption that unoccupied retail properties on the fringe of the shopping area can be converted to dwellings.Haverfordwest Town Development Boundary ,High Street Market Street etc Selected Features: Manually entered Comments:I a agree with the development boundary as drawn	Haverfordwest (Centre)		Support welcomed. No change required.				No			
34485	Pembrokeshire Coast National Park Authority		32	DP GN 31 Town Centre and Local Retail Centre Development	Comment	No comment	Policy GN 31 Town Centre and Local Retail Centre Development and paragraph 5.165 – this paragraph details that the reason for preventing concentrations of fast-food takeaways are related to the well-being of residents and visitors but the policy approach applies only to primary retail frontages. Such impacts are equally applicable to other commercial and retail areas where such premises are permitted. In addition, it would be helpful to quantify 'unacceptable concentration of fast-food takeaways' as detailed in the third bullet point of Policy GN 31.**Note: It would be helpful to clarify the approach to fast food outlets in non- primary frontages and to quantify 'unacceptable concentration'.**			Agree focussed change needed.			Agree that the potential effects of concentrations of fast-food take-aways would apply throughout the defined retail centres. The policy, as written, focusses on the Primary and Secondary Frontages and it would be useful to include some of the text currently set out in the written statement (paragraph 5.161) within the Policy. In terms of defining concentrations of fast-food take-aways, this will need to be assessed taking into account the particular character of the locality. As the number of hot-food take-aways has continued to increase, a growing awareness of the effects on public health are emerging. Studies have emerged which show a correlation between weight gain, type 2 diabetes, cardiovascular disease and other health issues and the density of hot-food take-aways. The policy aims to control the number of such premises in the areas of greatest retail density - namely the Primary Retail Frontages.	Yes			FC05.GN31.01 FC05.GN31.02 FC05.GN31.03

Representor Number	Representor	Agent	Representation :	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
													It is agreed that there is potential for concentrations of such uses across the whole of the identified Town Centres, particularly as outside of the Primary Retail Frontages the concentration of non-A1 uses may be greater with easy access to wider residential areas. For this reason it is agreed that the Policy should be amended to reflect this by amending bullet point 3 under Criterion A to apply it to all of the Town Centre areas. It is also agreed that a definition of 'unacceptable-concentration' is needed. It is proposed that this should be no more than 33% of shop-units in the Town Centre or Local Retail Centre; and no more than 33% of a frontage length of Primary Retail Frontages and no more than 3 consecutive units within the Town Centre. This will help to control the overall number of fast-food take-aways whilst acknowledging that many of the Town Centres in Pembrokeshire have higher than average vacancy rates.				

5.0 Policy GN 32 Out-of-Centre Retail and Commercial Development

Representor Number	Representor	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
4387	PRL Partnership	Lichfield (4409)	5	DP GN 32 Out-of-Centre Retail and Commercial Development	Object	No	Test of Soundness: 3 PRL Partnership seeks consistency between emerging policy GN32 and other emerging policies to ensure its effectiveness. Draft policy GN32 makes reference and exclusion to emerging policy GN29, but the same principle has not been made for emerging Policy 57. The same exclusion needs to be made for GN32. Retail facilities on camping and caravan sites and resorts (which are generally located out of settlement boundaries) aim to only meet the needs of visitors rather than competing with or replacing a much wider offering of local retail services. Such provision will be proportionate to the size of the site and would reduce the need to travel of site (by car) to access retail facilities selling essential items. Although resort retail undermines the retail hierarchy, pragmatism in policy must be applied to allow development vital for tourists.The exclusion is necessary since draft policy SP16 states: "Proposals which would undermine the retail hierarchy or regeneration frameworks for town centres will not be permitted." It is supported by emerging policies GN31 and GN32. Out of centre retail can be permitted provided that four criteria are met. Draft Policy 57 provides a supportive framework for the upgrade and improving of facilities on selfcatering sites (including static caravans, touring caravans and tent sites) where the proposal will not undermine the viability or vitality of a facility within a nearby settlement. With respect to retail facilities, this support is welcomed through the emerging policy. Sufficient safeguards are included in GN57 to align with emerging policy SP16 and so the following amendments are suggested: "This policy does not apply to community facilities located within the community it is seeking to serve (see policy GN 29 Community Facilities), or proposals which implement up-to-date Regeneration Strategies endorsed						Policy GN 57 (Site Facilities) clearly refers to facilities located within holiday parks, caravan and camping parks etc. Location of such facilities will be determined by the location of the enterprise it is intended to serve. The suggested change is considered unnecessary.	No			

Representor Number	Representor	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
							by the authority, or facilities on self-catering sites (see policy GN 57 Site Facilities)."										
4388	Haven Leisure Ltd	Lichfields (4409)	5	DP GN 32 Out-of-Centre Retail and Commercial Development	Object	No	Test of Soundness: 3 Haven Leisure Ltd seeks consistency between emerging policy GN32 and other emerging policies to ensure its effectiveness. Draft policy GN32 makes reference and exclusion to emerging policy GN29, but the same principle has not been made for emerging Policy 57. The same exclusion needs to be made for GN32. Retail facilities on camping and caravan sites and resorts (which are generally located out of settlement boundaries) aim to only meet the needs of visitors rather than competing with or replacing a much wider offering of local retail services. Such provision will be proportionate to the size of the site and would reduce the need to travel of site (by car) to access retail facilities selling essential items. Although resort retail undermines the retail hierarchy, pragmatism in policy must be applied to allow development vital for tourists.The exclusion is necessary since draft policy SP16 states: "Proposals which would undermine the retail hierarchy or regeneration frameworks for town centres will not be permitted." It is supported by emerging policies GN31 and GN32. Out of centre retail can be permitted provided that four criteria are met. Draft Policy 57 provides a supportive framework for the upgrade and improving of facilities on selfcatering sites (including static caravans, touring caravans and tent sites) where the proposal will not undermine the viability or vitality of a facility within a nearby settlement. With respect to retail facilities, this support is welcomed through the emerging policy. Sufficient safeguards are included in GN57 to align with emerging policy SP16 and so the following amendments are suggested: "This policy does not apply to community facilities located within the community it is seeking to serve (see policy GN 29 Community Facilities), or proposals which implement up-to-date Regeneration Strategies endorsed by the authority, or facilities on self-catering sites (see policy GN 57 Site Facilities)."						Policy GN 57 (Site Facilities) clearly refers to facilities located within holiday parks, caravan and camping parks etc. Location of such facilities will be determined by the location of the enterprise it is intended to serve. The suggested change is considered unnecessary.	No			

5.0 Policy GN 33 Farm Diversification

Representor Number	Representor Name	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
34450	Natural Resources Wales		11	DP GN 33 Farm Diversification	Support	No comment	We are supportive of the policy aim to support farm diversification as a means of sustaining the long-term viability of farming in Pembrokeshire. The importance of maintaining viable farms for food production and conservation land management should not be underestimated for reversing the decline in biodiversity and helping to manage flood risk in catchments			Support welcomed. No change required.				No			

5.0 & 6.0 Policy GN 36 Transport Routes etc./ Appendix 5: Safeguarded Transport Schemes

Representor Number	Representor Name	Agent	Representation :	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
2603	Dwr Cymru		14	DP GN 36 Transport Routes and Improvements	Comment	No comment	**GN36 Transport Routes and Improvements** There may be locations where proposed developments / routes pass over public sewers and water mains. Under the Water Industry Act 1991 we have rights to always access our apparatus and protection measures in respect of these assets will be required either in the form of an easement width or a possible diversion of the asset. We welcome early engagement once further detail is available.			Comment noted. No change required.				No			
1745	Cilgerran Community Council		5	DP Appendix 5: Policy GN 36 Transport Routes and Improvements – Programming Details for Safeguarded Transport Schemes	Object	No comment	With regards to the **Cardi Bach Shared Use Path 458**, Councillors wish to express their total support for the progression of the scheme.	Proposal Map & Inset Map Key	Candidate Site 458		The amendment suggested is not supported by the Plan's evidence base.		Candidate Site Register - CS.458. PCC Highways advised that no finance has been secured for the scheme. It is therefore premature to safeguard the route for this plan.	No			

5.0 Policy GN 38 Safeguarding etc., Policy GN 39 Secondary Aggregates etc., Policy 40 Buffer etc.

Representor Number	Representor Name	Agent	Representation :	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
4377	Ateb	Stantec(4376)	12	DP GN 38 Safeguarding and Prior Extraction of the Mineral Resource	Comment	No comment	We acknowledge that the Site was previously located within a mineral safeguarding area and as such could be impacted by draft Policy GN 38 Safeguarding and Prior Extraction of the Mineral Resource. The LP proposals map shows the area as being outside of the safeguarding area and within the proposed development boundary for Letterston. The supporting text of GN38 states that there are very few LDP allocations within the safeguarded mineral resource. In the rare instances in which they do occur, they will take precedence over the safeguarding requirement. In these cases, prior extraction of the mineral resource will be required where it is appropriate for this to happen. We will undertake further study to established whether it is practicable or viable for extraction to occur.	Letterston		Comment noted. No change required.				No			
34450	Natural Resources Wales		12	DP GN 38 Safeguarding and Prior Extraction of the Mineral Resource	Support	No comment	We support the measures in the supporting text 5.221 to protect nature conservation sites			Support welcomed. No change required.				No			

Representor Number	Representor Name	Agent	Representation	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
34450	Natural Resources Wales		13	DP GN 39 Secondary Aggregates and Recycled Waste Minerals	Support	No comment	We support the proposals to use secondary aggregates and recycled waste minerals where possible.			Support welcomed. No change required.				No			
2603	Dwr Cymru		16	DP GN 40 Buffer Zones Around Mineral Sites	Comment	No comment	**GN40 Buffer Zones around Minerals Sites** We note that our Bolton Hill Water Treatment Works (WTW) is within the buffer zone for Bolton Hill Quarry; we therefore wish to ensure that any potential future works that are required at the WTW can take place without restriction (notwithstanding the general requirement to obtain planning permission for development that does not benefit from permitted development rights).	Countryside		Comment noted. No change required.			GN 40 of the deposit plan states that new sensitive development or mineral extraction will not normally be approved within the mineral buffer zones. MTAN 1 describes sensitive development as "any building occupied by people on a regular basis and includes housing areas, hostels, meeting places, schools and hospitals where an acceptable standard of amenity should be expected". Under these terms Bolton Hill Water Treatment Works (WTW) is not considered a sensitive development. Therefore, the buffer zone will not restrict potential future works that are required at the WTW.	No			

5.0 Policy GN 41 Protection of National Designations to Policy GN 44 Biodiversity & Policy 47 Water Quality & Policy GN 51 Outdoor Recreation Areas & Policy 52 Open Spaces

Representor Number	Representor	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
34450	Natural Resources Wales		30	DP GN 41 Protection of National Statutory Environmental Designations	Support	No comment	**Project level HRA** - We welcome the inclusion of the requirement for project level Habitat Regulations Assessments and the amended text detailing the appropriate zone of influence in GN 41.			Support welcomed. No change required.				No			
34450	Natural Resources Wales		16	DP GN 42 Protection of Local Nature Reserves (LNR), Regionally Important Geodiversity Sites (RIGS) and Peat Deposits	Support	No comment	GN 42, GN 43, GN 45 GN 46, GN 48, GN 49, GN 51, GN 52 GN 59, GN 60 – policies to protect and enhance the natural environment – We welcome the inclusion of and recognise their contribution towards delivering SMNR and Area Statement theme priorities			Support welcomed. No change required.				No			
4393	Welsh Government Place Division, Housing and Regeneration Directorate	Lichfields (4394)	14	DP GN 43 Protection of Trees, Woodlands and Hedgerows	Support	Yes	Detailed submission of support provided.			Support welcomed. No change required.				No			
34450	Natural Resources Wales		17	DP GN 43 Protection of Trees, Woodlands and Hedgerows	Support	No comment	We welcome the inclusion of and recognise their contribution towards delivering SMNR and Area Statement theme priorities			Support welcomed. No change required.				No			

Representor Number	Representor	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
4409	Pembrokeshire Living Ltd	Lichfields (4409)	12	DP GN 44 Protection and Enhancement of Biodiversity	Object	No	The policy includes requirements that do not align with PPW. For example, Chapter 6 of PPW sets out that any non-statutory protected sites should apply the step-wise approach to determine the impacts on habitats and species. As it is currently written, draft policy GN 44 makes no allowance for the step-wise approach to be considered in the same way. The only reference to the step-wise approach in the policy is made in reference to the requirement for all development proposals must submit a Green Infrastructure Statement to demonstrate a net benefit for biodiversity. The draft policy introduces a need to demonstrate exceptional circumstances for every proposal where any habitat or a protected species might be disturbed. This is extremely limiting. Notwithstanding that the 'exceptional circumstances' is not defined, the threshold is far in excess of the approach taken in PPW which balances the need for (a range of) development against the needs to maintain and enhance biodiversity and the resilience of ecosystems. Accordingly, the second paragraph of the emerging policy should be reviewed in its entirety. The use of the word 'Protection' in the policy title should be removed and replaced with the word 'Maintenance'. Recommended policy title 'Maintenance and Enhancement of Biodiversity'. Cross reference is also made to representations submitted with respect to draft policy SP 12 by Pembrokeshire Living Limited. Draft policy SP 12 includes the following sentence: "All development proposals will be required to protect, conserve and enhance the natural environment, including:…" The subsequent			Agree focussed change needed.				Yes			FC5.GN44.01

Representor Number	Representor	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
							list is then preceded by the word 'protecting' for a range of natural environment resources. The use of the word 'protect' and 'protecting' in this policy should also be reviewed on the same basis.										
34450	Natural Resources Wales		14	DP GN 44 Protection and Enhancement of Biodiversity	Support	No comment	We appreciate the inclusion and reference to both biodiversity and ecosystem resilience as well as importance of connectivity and the multiple benefits afforded by ecosystems. The inclusion of PPW updated requirements for net gain for biodiversity and GI are also noted and supported. As per our comments on GN1 we welcome the fact that you have screened your allocations using Flood Map for Planning			Support welcomed. No change required.				No			
4393	Welsh Government Place Division, Housing and Regeneration Directorate	Lichfields (4394)	15	DP GN 44 Protection and Enhancement of Biodiversity	Object	No	A detailed submission is provided asking for amendments. Chapter 6 of PPW sets out that any non-statutory protected sites should apply the step-wise approach to determine the impacts on habitats and species. As it is currently written, draft policy GN 44 makes no allowance for the stepwise approach to be considered in the same way. The draft policy introduces a need to demonstrate exceptional circumstances for every proposal where any habitat or a protected species might be disturbed. This is extremely limiting. Notwithstanding that the "exceptional circumstances" is not defined; the threshold is far in excess of the approach taken in PPW which balances the need for (a range of) development against the need to maintain and enhance biodiversity and the resilience of ecosystems. Accordingly, the second paragraph of the emerging policy should be reviewed in its entirety.			Agree focussed change needed.				Yes			FC5.GN44.01

Representor Number	Representor	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
34450	Natural Resources Wales		18	DP GN 44 Protection and Enhancement of Biodiversity	Support	No comment	We welcome the inclusion of and recognise their contribution towards delivering SMNR and Area Statement theme priorities			Support welcomed. No change required.				No			
34450	Natural Resources Wales		15	DP GN 47 Water Quality and Protection of Water Resources	Support	No comment	The final paragraph of this policy refers to phosphorus sensitive riverine Special Areas of Conservation. Can this be changed from phosphorus to nutrient. 5.264 - The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 is the full title for the Regulations.			Agree focussed change needed.				Yes			FC5.GN47.01 FC5.GN47.02
2603	Dwr Cymru		18	DP GN 47 Water Quality and Protection of Water Resources	Comment	No comment	**GN47 Water Quality and Protection of Water Resources** We are investing in our Wastewater Treatment Works (WwTWs) to reduce phosphate in the five failing Special Area of Conservation (SAC) rivers in our operating area, this includes schemes **at Letterston West, Spittal and Wolfscastl**e WwTWs in Pembrokeshire that are due for completion in 2025. In the next investment period 2025 to 2030 (AMP8) we will target investment with the ambition that none of our WwTWs are the cause of ecological failure. Through our phosphorus investment plan, we will have removed 90% of the phosphorus load from our WwTWs discharging to failing SAC rivers, playing our part in allowing these special rivers to meet their water quality targets and to relieve pressure on development restrictions. We expect to complete this programme of work by 2032. Whilst our investment will remove a significant amount of phosphorus from our sewage, in most cases it will not result in SACs complying with the water quality			Comment noted. No change required.			To note the three locations that will benefit from upgraded WwTW under current investment proposals - Letterston West, Spittal and Wolfscastle. This can be referred to in the Development Sites and Infrastructure SPG.	No			

Representor Number	Representor	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
							targets on its own. This is not something that Welsh Water can do on its own and it will take the combined efforts of all the contributing sectors to achieve this. We will be engaging with our regulators and local planning authorities through the Nutrient Management Boards (NMB) which can provide the governance, strategic direction and local intelligence/decision making needed if we are to be successful in relieving the pressure on planning restrictions and restoring river quality										
4393	Welsh Government Place Division, Housing and Regeneration Directorate	Lichfields (4394)	17	DP GN 51 Protection and Creation of Outdoor Recreation Areas	Support	Yes	A detailed submission of support is provided.			Support welcomed. No change required.				No			
34450	Natural Resources Wales		22	DP GN 51 Protection and Creation of Outdoor Recreation Areas	Support	No comment	We welcome the inclusion of and recognise their contribution towards delivering SMNR and Area Statement theme priorities			Support welcomed. No change required.				No			
34550	L Greggain & Co Ltd	GJPPlanning (4358)	4	DP GN 52 Protection of Open Spaces with Amenity Value	Object	No	• Object to the site's part exclusion as an allocation, in light of the allocated Recreational Open Space - see accompanying statement. A detailed submission is provided regarding Land North of Hayston View, Johnston.	Johnston	OSP/048/07	Agree focussed change needed.			The section of woodland parallel to Church Close meets the criteria to be designated as amenity open space. The section measuring 0.95Ha covering part of the	Yes			FC5.GN16.Johnston.02 FC5.GN51.Johnston.01

Representor Number	Representor	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
													agricultural field does not meet the criteria and is recommended to be deleted from OSP/048/07 and added to housing allocation HSG/048/00038.				
34450	Natural Resources Wales		23	DP GN 52 Protection of Open Spaces with Amenity Value	Support	No comment	We welcome the inclusion of and recognise their contribution towards delivering SMNR and Area Statement theme priorities			Support welcomed. No change required.				No			

5.0 Policy GN 45 Green Infrastructure, Policy GN 48 Green Wedges, Policy GN 49 Landscape

Representor Number	Representor Name	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change
2603	Dwr Cymru		17	DP GN 45 Green Infrastructure	Support	No comment	**GN45 Green Infrastructure** We welcome the provisions of this policy and the supporting text. The integration of sustainable urban drainage systems as a Green Infrastructure asset is something that we are particularly supportive of.			Support welcomed. No change required.				No			
34450	Natural Resources Wales		20	DP GN 48 Green Wedges	Support	No comment	We welcome the inclusion of and recognise their contribution towards delivering SMNR and Area Statement theme priorities			Support welcomed. No change required.				No			
4388	Haven Leisure Ltd	Lichfields (4409)	6	DP GN 48 Green Wedges	Object	No	Haven Leisure Limited objects to the defined limits of the **Tenby/Penally green wedge**. PPW states that "Green wedges are local designations which essentially have the same purpose as Green Belts. They may be used to provide a buffer between the settlement edge and statutory designations and safeguard important views into and out of the area. Green wedges should be proposed and be subject to review as part of the LDP process" (paragraph 3.68). A detailed submission is provided.	Penally	Tenby Penally Green Wedge		The amendment suggested is not supported by the Plan's evidence base.		Planning Policy Wales, paragraph 3.64 identifies the use of Green Belts and green wedges as a means to protect open land from development. The wedge shown to the east of Penally Settlement Boundary extends to the boundary of the National Park. The National Park Local Development Plan continues the green wedge designation within its planning area to the Centre Boundary for Tenby. Collectively the two green wedge designations link to help protect against the coalition of Tenby and Penally. Whilst the settlement boundaries for both Penally and Tenby provide some means of limiting development, some types of development are permitted outside but adjacent to or well-related to settlement boundaries. In this location the distance between the two settlement boundaries is small (just half km along the road) and even minor, incremental changes will erode this gap. The extent of the green wedge from	No			

Representor Number	Representor Name	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change
													Penally to the National Park boundary has been re-assessed through the Plan Review process and amended to include additional land to the north of Penally. Whilst there are existing developments to the east of Marsh Road which are included within the green wedge, restricting the extent of the wedge to the west of Marsh Road would reduce the potential for the erosion of the gap between Penally and Tenby.				
4387	PRL Partnership	Lichfield (4409)	6	DP GN 49 Landscape	Support	Yes	PRL Partnership endorses draft policy GN 49 which provides a supportive framework regarding the integration of development into the landscape, and allows development proposals to include measures to mitigate any landscape impacts it may cause. These aspects meet the first test of soundness and are consistent with PPW which states that planning authorities should "...enable complementary development such as accommodation and access to be provided in ways which limit negative environmental impacts..." (paragraph 6.7.14)			Support welcomed. No change required.				No			
4388	Haven Leisure Ltd	Lichfields (4409)	7	DP GN 49 Landscape	Support	Yes	Haven Leisure Limited endorses draft policy GN 49 which provides a supportive framework regarding the integration of development into the landscape, and allows development proposals to include measures to mitigate any landscape impacts it may cause. These aspects meet the first test of soundness and are consistent with PPW which states that planning authorities should "...enable complementary development such as accommodation and access to be provided in ways which limit negative			Support welcomed. No change required.				No			

Representor Number	Representor Name	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change
							environmental impacts…" (paragraph 6.7.14)										
4393	Welsh Government Place Division, Housing and Regeneration Directorate	Lichfields (4394)	16	DP GN 49 Landscape	Support	Yes	A detailed submisison of support is provided.			Support welcomed. No change required.				No			
4377	Ateb	Stantec(4376)	14	DP GN 49 Landscape	Comment	No comment	Whilst supporting the aims of the Policy, we question why GN 49 Landscape is included in the Plan considering the wider strategic policy SP12 and the more specific policies such as GN 43 discussed above. The policy does not provide specific criteria or guidelines for what constitutes acceptable integration or mitigation and terms such as "well integrated," "acceptable visual impact," and "acceptably mitigate" are overly subjective without reference to specific SPDs or landscape studies. Whilst we maintain the importance of balancing development and landscape impact, this surplus policy could lead to inconsistencies in its application, when considered alongside strategic policy SP12 (Maintaining and Enhancing the Environment)				The amendment suggested is/can be addressed through supplementary planning guidance.		Policy GN 49 Landscape is supported by A Landscape Character Assessment - see the reasoned justification which will support the criteria set out in the policy. Also the policies referred to play a different role focusing more on the role of nature conservation and trees and woodland.	No			
34450	Natural Resources Wales		21	DP GN 49 Landscape	Support	No comment	We welcome the inclusion of and recognise their contribution towards delivering SMNR and Area Statement theme priorities			Support welcomed. No change required.				No			

5.0 Policy GN 57 Site Facilities

Representor Number	Representor	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
4387	PRL Partnership	Lichfield (4409)	7	DP GN 57 Site Facilities	Object	No	Test of Soundness: 2 and 3 The inclusion of emerging policy GN 57 is welcomed. The draft policy recognises that facilities are often needed in conjunction with the accommodation in order to respond to a range of operational needs or to improve the on-site offer to guests, e.g. storage building, reception, maintenance facilities, small shops or cafe etc. Representations submitted to draft policy GN 32 request the exclusion of developments that fall under policy GN 57 from requirements relating to out-of-centre retail and commercial developments. The requirement contained within criterion 2 appears to be unduly onerous. There is no definition of the “best practicable environmental standards” and so the policy could be used in an inconsistent way. Further, there is no justification as to why these facilities require environmental standards over and above other types of development covered in the emerging plan. Draft policies GN 1 and GN 2 provide requirements in relation to design which could be used instead of this criterion. Criterion 2 should be deletedReference in paragraph 5.323 of the Local Development Plan 2 Deposit Plan 2 to the emerging SPG should only go as far as relevant, as the SPG does not explicitly assess non-					Agree in part	Criterion 2 of Policy GN 57 (Site Facilities) reflects the considerable range of developments that can be considered as facilities on holiday parks and caravan and tent sites which extends beyond those generally considered as community facilities. This can include shower and washing facilities, laundry rooms and communal kitchen areas as well as shops, club houses and sports facilities. Paragraphs 5.322 and 5.323 set out the need for careful consideration of a range of potential effects. It is agreed that this lacks clarity which can be improved by rewording the explanatory text of the policy as follows: 5.322 The Authority is keen to see improvements that will increase the quality of the tourism offer provided in a way that does not harm the environment and landscape or impact negatively on facilities that are located in nearby settlements that serve the wider community. Where possible existing structures or buildings should be re-used. 5.323 Site facilities comprise a wider range of amenities and services than those serving the wider population and include showers, toilets, dishwashing and laundry facilities as well as shops, leisure and sports facilities and buildings intended for social activities and entertainment. Criterion 2 of the policy therefore requires that all aspects of such facilities that can impact on the environment are fully considered. Such considerations include impacts on the landscape - such as siting, landscaping and lighting. Any landscaping measures should maximise biodiversity and use native species appropriate to the landscape setting and demonstrate they are in line with the	Yes			FC5.GN57.01

Representor Number	Representor	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
							accommodation facilities. Consideration should be given to removing this reference for the avoidance of doubt. If it is retained, the paragraph needs to explicitly state that only the siting and mitigation guidance is relevant. This will avoid any suggestion that the conclusions on capacity in the emerging SPG relate to the provision of facilities within self-catering sites.						requirements of the Caravan, Camping and Chalet Landscape Capacity Assessment which, as noted above will form the basis for SPG. Other potential impacts on the environment include sewage and waste-water disposal, noise, impacts on wildlife and biodiversity and amenity of neighbouring properties and businesses.				
4388	Haven Leisure Ltd	Lichfields (4409)	8	DP GN 57 Site Facilities	Object	No	Test of Soundness: 2 and 3 The inclusion of emerging policy GN 57 is welcomed. The draft policy recognises that facilities are often needed in conjunction with the accommodation in order to respond to a range of operational needs e.g. storage building, reception, maintenance facilities, small shops or cafe etc. Representations submitted with respect to draft policy GN 32, request explicit exclusion for developments that fall under policy GN 57 for the avoidance of doubt. In terms of the requirement at criterion 2, it appears onerous. There is no definition about what this means and therefore it could be used in an inconsistent way. Further, there is no justification as to why these facilities require environmental standards over and above other types of development covered in the emerging plan. Draft policies GN 1 and GN 2 provide requirements in relation to design which could be used instead of this criterion. Criterion 2 should be deleted. Reference in paragraph 5.323 of the Deposit 2 plan to the emerging SPG should only go as far as relevant, as the SPG does not					Agree in part	Criterion 2 of Policy GN 57 (Site Facilities) reflects the considerable range of developments that can be considered as facilities on holiday parks and caravan and tent sites which extends beyond those generally considered as community facilities. This can include shower and washing facilities, laundry rooms and communal kitchen areas as well as shops, club houses and sports facilities. Paragraphs 5.322 and 5.323 set out the need for careful consideration of a range of potential effects. It is agreed that this lacks clarity which can be improved by rewording the explanatory text of the policy as follows: 5.322 The Authority is keen to see improvements that will increase the quality of the tourism offer provided in a way that does not harm the environment and landscape or impact negatively on facilities that are located in nearby settlements that serve the wider community. Where possible existing structures or buildings should be re-used. 5.323 Site facilities comprise a wider range of amenities and services than those serving the wider population and include showers, toilets, dishwashing and laundry facilities as well as shops, leisure and sports facilities and buildings intended for social activities and entertainment. Criterion 2 of the policy therefore requires that all aspects of such facilities that can impact on the environment are fully considered. Such	Yes			FC5.GN57.01

Representor Number	Representor	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
							explicitly assess non-accommodation facilities. Consideration shouldbe given to removing this reference for the avoidance of doubt. If it is retained, the paragraph needs to explicitly state that only the siting and mitigation guidance is relevant. This will avoid any suggestion that the conclusions on capacity relate to the provision of facilities on site.						considerations include impacts on the landscape - such as siting, landscaping and lighting. Any landscaping measures should maximise biodiversity and use native species appropriate to the landscape setting and demonstrate they are in line with the requirements of the Caravan, Camping and Chalet Landscape Capacity Assessment, which as noted above will form the basis for SPG. Other potential impacts on the environment include sewage and waste-water disposal, noise, impacts on wildlife and biodiversity and amenity of neighbouring properties and businesses.				

5.0 Policy GN 46 Coastal Change

Representor Number	Representor	Agent	Representation :	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
1894	South Meadow Homes	G Thomas (1536)	3	DP GN 46 Coastal Change	Object	No	Pembrokeshire LDP2 is evolving at the same time that TAN15 is being reviewed. The LPA have drafted **Policy GN46 Coastal Change** in an attempt to respond. Existing TAN15 and the evolving replacement recognise the need for DEFENDED ZONES when BROWNFIELD REDEVELOPMENT is undertaken. We suggest the wording of Policy GN46 should encompass this objective more clearly.			Agree focussed change needed.			Policy GN 46 (Coastal Change) was included in the Plan due to the delay in publication of the revised TAN15: Development, Flooding and Coastal Erosion and the complications caused by the terminology of the former TAN15: Flooding not linking directly with the Flood Map for Planning, which has been the basis for up-to-date flood advice since 2023. The revised TAN15 was published on 1st April 2025 and fulfils the aims of Policy 46 (Coastal Change). It is therefore proposed to delete Policy from the Plan.	Yes			FC5.GN 46.01
34450	Natural Resources Wales		19	DP GN 46 Coastal Change	Support	No comment	We welcome the inclusion of and recognise their contribution towards delivering SMNR and Area Statement theme priorities			Agree focussed change needed.			Policy GN 46 (Coastal Change) was included in the Plan due to the delay in publication of the revised TAN15: Development, Flooding and Coastal Erosion and the complications caused by the terminology of the former TAN15: Flooding not linking directly with the Flood Map for Planning, which has been the basis for up-to-date flood advice since 2023. The revised TAN15 was published on 1st April 2025 and fulfils the aims of Policy 46 (Coastal Change). It is therefore proposed to delete Policy from the Plan.	Yes			FC5.GN 46.01
34485	Pembrokeshire Coast National Park Authority		34	DP GN 46 Coastal Change	Support	No comment	Policy GN 46 Coastal Change – criterion 3 does not allow the extension of an existing use class C residential property. This is not in conformity with TAN 15 which states that minor extensions should not raise significant issues unless there are adverse effects which would			Agree focussed change needed.			Policy GN 46 (Coastal Change) was included in the Plan due to the delay in publication of the revised TAN15: Development, Flooding and Coastal Erosion and the complications caused by the terminology of the former TAN15: Flooding not linking directly with the Flood Map for Planning, which has been the basis for up-to-date flood advice since 2023. The revised TAN15 was published on 1st April 2025 and fulfils the aims of Policy 46 (Coastal Change). It is	Yes			FC5.GN 46.01

Representor Number	Representor	Agent	Representation :	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
							require appraisal of the full consequences of the development and the need to provide a Flood Consequences Assessment. The approach taken by PCNPA is to resist intensification of existing development unless it can be demonstrated that there will be no increased risk to life or significant increase in risk to property and this might be a more nuanced approach than simply restricting all extensions.Support approach in principle. **Note: Suggested inclusion of reference to minor extensions being acceptable where it can be demonstrated there are no adverse effects.**						therefore proposed to delete Policy from the Plan.				

5.0 Policy GN 59 Waste Management Facilities & Policy 60 Disposal of Waste on Land

Representor Number	Representor Name	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC)
4448	Carew Castle Estate	Edward H Perkins(2348)	2	DP GN 59 Waste Management Facilities	Object	No	A detailed statement on site suitability and need, ecology, agricultural land quality, impact on acquifer/drainage considerations, compatibility with national guidance, future intentions. Policy reference updated to the equivalent LDP 2 Deposit 2 Policy reference.	Carew & Sageston	Candidate Site 286		The amendment suggested is contrary to National Planning Policy and/or Guidance.		Candidate Site 286 proposed this site for employment uses and sui generis uses to allow for waste recycling. The proposal was rejected due to concerns regarding ecology and potential impacts on an aquifer, due to lack of mains drainage. The Deposit Plan 2 representation elaborates on the waste-related activities mooted for the site, referencing wood waste, an associated bulking plant, separating out inert waste streams, including plastic waste and scrap metal recovery. At present, there are existing employment and waste activities in existing buildings and using industrial plant located on the concrete former runway area. These activities are of a modest scale and where appropriate have NRW licences / permits. There is a central grassland area which is unused. The proposal for the site is for expansion and intensification of industrial and waste-management activities and the initial rejection of the Candidate Site has been challenged. In terms of ecology, a detailed ecological report has been submitted, which has been found to be thorough and to provide a fair assessment of the situation that prevails at this site. However, as	No			

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													the representor has acknowledged, it was prepared for the 2020 Deposit Plan consultation and is now out of date in some respects. Although there are some issues that would need to be addressed in conjunction with any future development, these could be dealt with by suitable mitigation. In terms of the potential impacts on the aquifer, it is noted by the proposer that the existing industrial / waste activities are licenced / permitted by NRW and that sealed systems are used. In terms of the scale of current operations, that provides a satisfactory solution, but this proposal envisages both expansion of activities and intensification. TAN 21 on Waste contains numerous references to risk to water, waterways, SACs, water bodies, groundwater and to the local water table in relation to waste and associated industrial activities. It is known that there is no mains drainage system at this site and there is considerable uncertainty whether sealed systems for intensified and extended industrial and waste activities on this site would be either feasible or satisfactory to deal with either matters relating to potential pollution of surface water or groundwater. In that context, the Council is aware that the Milton Borehole Aquifer (which lies beneath this site) makes an				

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													important contribution to the water supply system in Pembrokeshire and it is imperative that this is not compromised. Hence, whilst continuation of the current small-scale industrial and waste activities on this site can continue, a significant expansion / intensification would be problematic and for that reason the allocation of the site for industrial / waste activities is not recommended. In making that recommendation, the Council has taken into consideration the brownfield nature of the site, the existing activities, the potential for ecological mitigation and also some issues relating to agricultural land value (and noting that the representor has supplied further information on this aspect, which suggests that the ALC categorisation may be too high). However, these do not outweigh the potential negative impacts that development might have on surface water and groundwater.				
34450	Natural Resources Wales		24	DP GN 59 Waste Management Facilities	Support	No comment	We welcome the inclusion of and recognise their contribution towards delivering SMNR and Area Statement theme priorities			Support welcomed. No change required.				No			

Representor Number	Representor Name	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
34450	Natural Resources Wales		25	DP GN 60 Disposal of Waste on Land	Support	No comment	We welcome the inclusion of and recognise their contribution towards delivering SMNR and Area Statement theme priorities			Support welcomed. No change required.				No			

6.0 Local Development Plan Appendices

Representor Number	Representor	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
34485	Pembrokeshire Coast National Park Authority		35	DP Appendix 1: Affordable Housing Table	Comment	No comment	General Comments: Appendix 1: Column 'Total' should read '5 Year Average'?						Agree with the representation. However, the table will be replaced in its entirety to show deliver of affordable housing to date and expected units, instead of showing	Yes			FC6.App01.01

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													historical trend data.				
1507	Welsh Government		6	DP Appendix 2: Housing Components and Trajectory	Comment	Yes	**Housing trajectory** The inclusion of a housing trajectory graph is a national policy requirement (PPW, paragraph 4.2.10). Guidance on how to prepare a trajectory is contained in the Draft Development Plans Manual (DPM, Edition 3, consultation, June 2019). The Welsh Government notes the Deposit plan does contain a trajectory in table and graph form (Appendix 2) which is supported. With regards to the content of the trajectory, Welsh Government notes the 'Large Windfall Completions' have been zeroed for two years, in line with the DPM. Whilst the remaining completions in 2033 ideally should be zero (Row N, 2033) there is a deviation of 28 units over the provision in policy SP2. However, this is less than 0.5% of the overall provision and is not considered of concern. **The Welsh Government is content that previous representations have been addressed and the plan is compliant with the DPM and national planning policy.**			Comment noted. No change required.				No			
34550	L Greggain & Co Ltd	GJPPlanning (4358)	9	DP Appendix 2: Housing Components and Trajectory	Object	No	• Detailed changes to the proposed trajectory of the site in the Plan period- see accompanying statement. A detailed submission is provided regarding Land North of Hayston View, Johnston.	Johnston	HSG/048/00038		The amendment suggested is not supported by the Plan's evidence base.		The Joint Housing Land Availability Study (JHLAS) 2012 to 2020 and Housing Delivery Assessment HDA 2020 to 2024 contains the delivery	No			

Representor Number	Representor	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
													rates for 086/00226 (Bunkers Hill) and 086/00129 (Beaconing Fields). Analysis shows a track record of 11 Dwellings Per Annum (DPA) for Greggain Ltd, which does not support the representation.				
4408	PLANED		2	DP Appendix 3: Supplementary Planning Guidance	Support	Yes	Severe housing crisis Welsh Government's commitment to make the delivery of affordable housing a priority for the planning system.			Support welcomed. No change required.				No			
4188	Wales & West Housing	Asbri Planning (4389)	5	DP Appendix 3: Supplementary Planning Guidance	Support	Yes	Wales & West Housing Association welcome the ability to comprehensively masterplan the site as referenced in Appendix 3 as part of the LDP and any related SPG process.	Fishguard	S/HSG/034F/LDP2/1	Support welcomed. No change required.				No			
1745	Cilgerran Community Council		5	DP Appendix 5: Policy GN 36 Transport Routes and Improvements – Programming Details for Safeguarded Transport Schemes	Object	No comment	With regards to the **Cardi Bach Shared Use Path 458**, Councillors wish to express their total support for the progression of the scheme.	Proposal Map & Inset Map Key	Candidate Site 458		The amendment suggested is not supported by the Plan's evidence base.		Candidate Site Register - CS.458. PCC Highways advised that no finance has been secured for the scheme. It is therefore premature to safeguard the route for this plan.	No			

7.0 Delivery Agreement

Representor Number	Representor Name	Agent	Representation No.	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
4433	C Rone		2	Delivery Agreement	Object	No	A detailed submission is provided questioning the approach taken to community engagement.				The amendment suggested is not supported by the Plan's evidence base.		The Council has prepared Consultation Reports (available on the website) which outline how it has carried consultation and engagement. This includes raising awareness with local Councillors, with Town and Community Councils, publishing press releases, public notices, on the Council's website, via social media and through individual account holders via the Council's website. It is not possible to specifically target each individual householder in Pembrokeshire. That level of engagement would be unattainable. As the commentator is now on the Local Development Plan mailing list the Council will be able to correspond directly at formal plan consultation stages.	No			

7.0 Financial Viability Report (July 2024)

Representor Number	Representor Name	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
4393	Welsh Government Place Division, Housing and Regeneration Directorate	Lichfields (4394)	18	Financial Viability Report (July 2024)	Object	No	A detailed submission is provided. Our representations to Policies GN16 and GN18 address this matter. However, of relevance to the viability assessment is a concern that the Council has failed to follow due process and that this might undermine the inclusion of this important site. We are satisfied that the proposed development at Slade Lane is viable and deliverable (subject to correcting the erroneous reference to an 83% affordable housing requirement). By way of resolution, we would be pleased to work with the Council at the earliest opportunity to ensure that the viability of this important site is fully tested.			Agree no change required.		PCC has accepted that the policy GN 16 entry in relation to affordable housing provision on the Slade Lane, Haverfordwest, site needs to change. Subject to the necessary changes being made to that element of GN 16, PCC agrees with the representor that the site is viable and deliverable. However, it is not considered that a key site viability assessment is required in this case, as (with the exception of the already consented phase 1) the site will be developed by an RSL with at least 50% affordable housing, with Social Housing Grant expected to be available.	PCC is proposing a Focussed Change to policy GN 16 to revise the affordable housing provision figure for the Slade Lane, Haverfordwest, site. The new figure will be a reflection of the permitted provision in phase 1 (Pobl), the proposed provision in phase 2 (also Pobl) and Welsh Government's stated aspiration to provide at least 50% affordable housing on the remaining parts of the site, as set out in the 2024 tender document for the Masterplanning work, and including the phase 3 development anticipated to take place in the LDP 2 plan period. As a precaution, PCC has re-contacted Welsh Government to check whether the commitment to build out the remainder of the site with a minimum 50% affordable housing remains their intention. The product of those changes to the affordable housing provision are set out in FC75, which modifies GN 16 - giving an overall figure of 46% for phases 1 to 3 in combination. The representor (Lichfields on behalf of Welsh Government) has indicated a willingness to carry out a key site viability appraisal for the Slade Lane site should that be deemed necessary. The reason why this site wasn't chosen for a key site viability appraisal is because it is expected to be developed by an RSL with at least 50% affordable housing, the same reasoning also explaining why Maesgwynne, Fishguard, was not chosen. The parts of Slade Lane currently awaiting reserved matters planning permissions are expected to be built out at 50% + affordable housing. The already permitted phase 1 proposal falls slightly below this figure. As a precaution, if Welsh Government's reply to PCC indicates a wish to amend their previously stated aspiration for build out of the remainder of the site to be based on a minimum 50% provision of affordable dwellings, then PCC will contact Lichfields to request a key site viability appraisal to	No			

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													inform a subsequent re-consideration of the appropriate level of affordable housing provision.				

Representor Number	Representor Name	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
1533	Home Builders Federation (Mark Harris)		5	Housing Background Paper	Object	No	HBF considers that there is no justification or reason is provided for the reduction in flexibility allowance from 15% to 10%.. • The publication of new guidance on phosphates in Riverine Special Areas of Conservation in Wales by Natural Resources Wales in January 2021 has resulted in the loss of approximately 430 dwellings, comprising of 254 units on allocations and 180 windfall units.- Potential solutions could still be found that would allow some if not all these homes to come forward. • Housing delivery in the first 6 years of the LDP 2 plan period has been delivered at an average of 337 dwellings per annum, which is significantly below the Deposit 1 target of 425 dwellings per annum. – We do not belief planning for the future should be based on past trends particularly over such a volatile period. There are many factors which can affect delivery rates including whether or not there were enough deliverable/viable sites available in the adopted plan, also TAN1 was removed during this period. The document notes that this reduced delivery level will result in a loss of younger people from the area and less job growth, both issues which the plan set out to tackle. The impact of reduced jobs is particular concerning when the plan identifies the impact of around 1000 additional jobs linked to the Celtic Port status.				The amendment suggested is not supported by the Plan's evidence base.		The Council's Background Paper on Housing Requirement 2023 sets out the journey the Plan's Housing Requirement has made from the original Preferred Strategy, Deposit Plan 1 and the associated objection from Welsh Government detailed at paragraph 9 which flagged dangers of overprovision. The approach to the requirement in Policy SP 2 Housing Requirement also reflects the advice of the Development Plans Manual *The level of flexibility will be for each LPA to determine based on local issues; the starting point for such considerations could be 10% flexibility with any variation robustly evidenced.*(Paragraph 5.59) The Council does not have evidence to justify a 15% flexibility allowance. In any case Appendix 2B and 2C identifies in addition to the flexibility allowance units that are allocated or with planning permission which are forecasted as likely to come forward beyond the Plan period. Should the Council's forecasting prove to be an underestimation then this is a further flexibility allowance.	No			

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34751	Amroth Community Council		3	Rural Facilities Background Paper	Comment	No comment	2. Summerhill It should be noted that the points awarded for a public house/club in Summerhill relate to Meadow House Carvan park which is located outside the village boundary.	Summerhill		Comment noted. No change required.			The public bar/club at Meadow House is open to non-residents. Its location outside the settlement boundary for Summerhill does not affect its status as a facility for the local community.	No			

7.0 Strategic Flood Consequences Assessment

Representor Number	Representor Name	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
34450	Natural Resources Wales		32	Strategic Flood Consequences Assessment	Comment	No comment	Strategic Flood Consequences Assessment - The SFCA produced by Atkins covers the broad-based remit and criteria for a Stage 1 SFCA. The SFCA proposes a desk-based assessment of sites utilizing existing flood risk information and adopting a 'precautionary' approach to estimating future flood risk. It is accepted that the broad scale nature of a Stage 1 SFCA means that any sites identified as having an element of flood risk will require further, more detailed assessment if they are to progress. It is therefore important that the screening criteria utilized is robust enough to capture all sites that may be liable to flood risk over the lifetime of development. In order to assess the flood risk to sites in the present day the SFCA refers to the NRW Flood Map zones 2 and 3, NRW Risk of Flooding from Surface Water maps, the Shoreline Management Plan and some historic flood information. In order to estimate flood risk over the lifetime of potential developments the SFCA proposes some assumptions. For fluvial flood risk an assumption has been made that the existing 0.1% flood extent indicated by zone 2 on our Flood Map give an indication of the future 1% flood extent. Whilst this assumption is not supported by any evidence the SFCA considers it to be a 'conservative assumption'. For tidal flood risk the future 0.1% level is estimated by utilizing a + 2m buffer layer within the South of Wales Shoreline Management Plan 2. This layer adds 2m to the current 0.1% tidal flood extent and is therefore considered to be a conservative approach. With regard to the future tidal 0.5% level the SFCA proposes the use of a single level contour of 7m around the whole coastline covered. The 7m contour was overlaid at a 50m resolution resulting in a very coarse estimation of future flood extent not appropriate for particular sites. We would also advise that the existing 0.5% tide level, based			Comment noted. No change required.				No			

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							on 2016 figures, is 6.02m AOD. If an allowance for predicted sea level rise of 1.08m over 100 years is added this will equate to a future level of 7.1m AOD. Therefore, the proposed 7m contour may not capture all site areas affected by the future 0.5% tidal flood extent. When this is combined with the coarse 50m grid used an element of caution must be used in that full extent of flood risk affecting some sites may not be captured at Stage 1.It has been confirmed that all allocations have also be screened using Flood Map for Planning (FMfP). There are two housing commitments that have curtilage (garden) areas now within the flood zone, however they already have planning permission and in both cases, they were obtained some years ago prior to publication of FMfP.									

7.0 Sustainability Appraisal

Representor Number	Representor	Agent	Representation Number	PCC Plan or Document Reference	Rep Type	Sound	Representor Comment/ Suggested Change	Location	Site Reference	PCC Agree	PCC Disagree	PCC Agree in Part	Edit not required as PCC Document or National Policy ref/paragraph ref below sufficient or explanation of edit required.	Edit Required	See Minor Edit No.	Other Edit No.	See Focussed Change (FC) No.
34450	Natural Resources Wales		33	SA General	Comment	No comment	The deposit plan has undergone sustainability appraisal incorporating Strategic Environmental Assessment. We are satisfied with the outcomes and conclusions.			Comment noted. No change required.				No			
34485	Pembrokeshire Coast National Park Authority		36	SA Appendix 4: Strategic Policies	Comment	No comment	SP2 Housing Requirement – Housing requirement, assessment against SA Objective 10. The impact here is likely to be negative since the development of 6,800 new homes will increase emissions due to energy use, waste and travel. Mitigation measures required by National Policy may allow the reduction of per capita Carbon emissions.			Agree minor change needed.				Yes		OE3	
34485	Pembrokeshire Coast National Park Authority		37	SA Appendix 4: Strategic Policies	Comment	No comment	SP2 Housing Requirement - assessment against SA Objective 14. Household and population increase will place increased pressure on inland water bodies for abstraction.			Agree minor change needed.				Yes		OE4	