

**Please note responses to representations can be found in:**

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

**Appendix 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<sup>th</sup> July 2025**

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## 4.1 Agricultural Land Classification/Peatland

Has National Guidance on Agricultural Land Classification (ALC) and Peatland been followed and applied correctly?		
LDP and Other Document References	<ul style="list-style-type: none"> <li>i) GN 1 General Development Policy</li> <li>ii) GN 6 Development Proposals in Pre-Assessed Areas for Wind Energy (as set out in Future Wales)</li> <li>iii) GN 42 Protection of Local Nature Reserves (LNR), Regionally Important Geodiversity Sites (RIGS) and Peat Deposits</li> <li>iv) Candidate Sites' Register and Site Assessment September 2024</li> <li>v) LDP 2 Deposit Plan Allocations and Agricultural Land Background Paper-May 2024</li> <li>vi) Sustainability Appraisal and Strategic Environmental Assessment Report – Re-Deposit Plan - September 2024</li> <li>vii) Data Map Wales - Predictive Agricultural Land Classification (ALC) Map 2<sup>1</sup> Planning Policy Wales Edition 12 Paragraphs 3.58 and 3.59</li> <li>viii) Predictive Agricultural Land Classification Map Guidance Note May 2021 – Chapter 4 survey decision flow chart</li> </ul>	

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
<p><b>1. Application of Welsh Government published guidance on Agricultural Land Classification Surveys:</b> National planning policy is clear that agricultural land of grades 1, 2 and 3a, the best and most versatile land should be conserved as a finite resource. Policy GN1, point 4 notes the need for an ALC survey. However, this is not as per the flow chart in the WG Departmental published guidance – only if the predictive ALC map notes Best Most Versatile (BMV) on site (Grade 1, 2 or Subgrade 3a) is a survey required. This should be amended (in line with guidance on the Predictive ALC map) in GN1, section 5.4 and in numerous other documents (e.g. Candidate Site Assessment Criteria and ALC Topic Paper 1 &amp; 2).</p>	1507/12	Welsh Government

<sup>1</sup> [https://datamap.gov.wales/layers/inspire-wg:wg\\_predictive\\_alc2](https://datamap.gov.wales/layers/inspire-wg:wg_predictive_alc2)

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
None of the allocated sites involving BMV (approx. 200 Ha?) has evidence provided of ALC field survey work undertaken to confirm grading. This is not in line with published WG departmental guidance and requires reviewing.		
<b>2. Referencing of data provided by Welsh Government on agricultural land quality in evidence base:</b> Welsh Government has published data on agricultural land quality (2020) - this has not been referenced as background data for the plan and the application of policy. The WG has previously (2019, 2021 and 2022) provided LPA directly with agricultural land quality information for sites being considered and the need to commission detailed ALC field surveys where BMV is an issue for consideration. It is unclear how this is used in the evidence base and SA.	1507/12	Welsh Government
<b>3. Review Agricultural Land Classification topic paper to demonstrate how policy is applied:</b> The LPA has produced an ALC Topic Paper which should clearly demonstrate and summarise how BMV policy has been applied and addressed throughout the development of the LDP – this is not the case. The paper should be reviewed to include a summary of how BMV policy is evidenced and justified in the plan, from sustainability appraisal, the spatial strategy and site selection assessments for allocations and candidate sites (what weight has been given to BMV land; how BMV policy has been applied to the spatial strategy and site selection).	1507/12	Welsh Government
<b>4. Justify loss of BMV land linking to search sequence and spatial strategy:</b> The Council must be able to robustly justify any loss of BMV land linked to the search sequence in Planning Policy Wales (PPW) and findings in the SA.	1507/12	Welsh Government
<b>5. Update references to Peat data -</b> refer to the Peatlands of Wales (2022) evidence score map via Data Map Wales. It is unclear on the extent and distribution of peat soils in the LPA and how the SA has considered this in the assessment. The SA references the Unified Peatland Map (UPM)	1507/12	Welsh Government

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
which was superseded by the Peatlands of Wales Evidence Score maps in 2022. It is not clear what the BMV or peatland resource is for the LPA and relationship to the LDP.		
<b>6. Policy GN 6 Development Proposals in Pre-Assessed Areas for Wind Energy (as set out in Future Wales) - Section 5.55 - add reference to Peatland.</b> Policy needs reviewing in line with the updates to PPW Chapter 6 to consider impacts to peat soils and peatland habitats in site selection and infrastructure siting for wind energy projects. The main points are: <ul style="list-style-type: none"> <li>• Use of the Peatlands of Wales evidence score map as a first step;</li> <li>• Consideration of the 'stepwise approach (6.4.15 1a and 1b, irreplaceable habitats including the natural resources which underpin them);</li> <li>• Consideration of peatland paragraph 6.4.34.</li> </ul>	1507/12	Welsh Government

Response
<p><b>1. Application of Welsh Government published guidance on Agricultural Land Classification (ALC) Surveys:</b> Policy GN 1 General Development Policy is proposed for change to reflect the updated guidance (Predictive Agricultural Land Classification Map Guidance Note May 2021 – Chapter 4 survey decision flow chart) on when an ALC survey is required (When a site contains predicted Best and Most Versatile (BMV) land). Surveys will be required on allocated sites where there is predicted BMV land as shown on the ALC2 map layers on Data Map Wales<sup>2</sup>.</p> <p><b>2.</b> Edits are proposed to the Agricultural Land Classification (ALC) Background Paper to detail how the evidence provided has been applied.</p> <p><b>3.</b> An edit to the LDP 2 Deposit Plan Allocations and Agricultural Land Background Paper can address how national policy on Best and Most Versatile land (BMV) has been applied in both the Candidate Site Assessment and Sustainability Appraisal.</p> <p><b>4.</b> Full consideration has been given to BMV land in the Plan's preparation including site assessment and allocation. A high proportion of the Plan area's settlements are heavily constrained by BMV. The ALC topic paper highlights the difficulty in avoiding BMV land by showing the spatial distribution of BMV around settlement boundaries.</p> <p><b>a.</b> An example of the difficulty in allocating non BMV sites in the Candidate Site Assessment is provided below.</p>

<sup>2</sup> Data Map Wales -Predictive Agricultural Land Classification (ALC) Map 2  
[https://datamap.gov.wales/layers/inspire-wg:wg\\_predictive\\_alc2](https://datamap.gov.wales/layers/inspire-wg:wg_predictive_alc2)

- b. Of a total of 57 settlements earmarked for growth, 32 settlements in the Plan area have an allocated residential candidate site. Housing allocations are included in Urban Settlements, Service Centres, and Service Villages (see table in paragraph 4.31 of the Local Development Plan). This is where growth is primarily focussed in accordance with the spatial strategy.
- c. Ten of those 32 settlements have residential allocation/s with no BMV and are not shown in the table below. (The table highlights the number of candidate sites with BMV in each settlement. Column A shows the total potential residential candidate sites and Column B shows all potential residential candidate sites excluding sites which did not contain Best Most Versatile land and which were screened out in the candidate site assessment.)

		A	B	C	D	E	F	G	H	I
	Settlement with allocation containing BMV	Total Residential Candidate Sites	Remaining Residential CS	Residential CS with BMV	% Residential CS with BMV	Remaining Residential CS with No BMV	% of Total Candidate Sites with no BMV	Residential CS Allocation with BMV	Residential CS Allocation no BMV	
1.	Fishguard	9	8	7	88%	1	14%	1	0	
2.	Merlins Bridge	4	3	3	100%	0	0%	2	0	
3.	Milford Haven	17	16	13	81%	3	23%	4	3	100%
4.	Neyland	2	2	2	100%	0	0%	1	0	
5.	Pembroke	24	21	16	76%	5	31%	2	3	
6.	Pembroke Dock	12	7	6	86%	1	17%	1	1	100%
7.	Johnston	7	6	6	100%	0	0%	2	0	
8.	Kilgetty	5	4	4	100%	0	0%	1	0	
9.	Lamphey	4	3	3	100%	0	0%	2	0	
10.	Letterston	11	10	10	100%	0	0%	1	0	
11.	Llangwm	4	3	3	100%	0	0%	1	0	
12.	Begelly	10	8	6	75%	2	33%	1	0	
13.	Crundale	5	4	4	100%	0	0%	2	0	
14.	Hill Mountain	7	7	7	100%	0	0%	3	0	
15.	Hundleton	11	10	9	90%	1	11%	1	1	100%
16.	Jeffreyston	2	2	2	100%	0	0%	1	0	
17.	Llanstadwell	2	2	2	100%	0	0%	1	0	
18.	Pentlepoir	15	10	10	100%	0	0%	1	0	
19.	Simpson Cross	2	2	2	100%	0	0%	1	0	
20.	St Florence	7	7	7	100%	0	0%	1	0	
21.	Templeton	9	7	6	86%	1	17%	1	0	
22.	Wolfscastle	1	1	1	100%	0	0%	1	0	
	<b>Totals</b>	<b>170</b>	<b>143</b>	<b>129</b>	<b>90%</b>	<b>14</b>	<b>11%</b>	<b>32</b>	<b>8</b>	

- d. Of the remaining 22 settlements earmarked for growth shown in the table above, there was no other option in 15 Settlements than to choose from BMV Candidate sites – see Column D cells highlighted in yellow for the relevant settlement.
- e. Of the remaining 7 settlements there were 3 settlements where the option of selecting all the non BMV-available candidate sites was chosen – see Column I cells highlighted in green. There was, however, a need to select further land for allocation as explained below:
- **Milford Haven:** There were 3 non BMV sites available for allocation and these were chosen. (see Column H). Milford Haven is a Main Town in the Plan area and these non BMV allocations would be insufficient to provide for the housing requirements of Milford Haven.
  - **Pembroke Dock:** There was 1 non BMV site available for allocation and this was chosen. Pembroke Dock is a Main Town in the Plan area and these non BMV allocations would be insufficient to provide for the housing requirements of Pembroke Dock.
  - **Hundleton:** There was 1 non BMV site available for allocation and this was chosen. For the level of growth required at Hundleton, is a Service Village, and requires a level of growth additional to the 1 non BMV site available for allocation which was chosen.
- f. This leaves 4 settlements to consider:
- **Fishguard:** There was 1 non BMV site available for allocation in the town centre which was suitable for a range of uses. This was retained in the settlement boundary for such uses and therefore was not allocated for residential use. The only other candidate site in the settlement which did not contain BMV was screened out on highways grounds. Fishguard is a main town and requires housing provision to be made. Please see the Agricultural land classification Background Paper (Part 1 - page 55) for further details.
  - **Pembroke:** The 3 non BMV sites that were available were chosen for allocation, with the other 2 possible non BMV candidate sites being included in the settlement boundary (but not allocated). All other candidate sites with no BMV were screened out due to significant constraints including highway concerns and flooding issues. Pembroke is a Main Town in the Plan area and solely allocating the non BMV allocations would be insufficient to service the growth required. Please see the Agricultural land classification background paper (Part 1 -page 44) for further details.
  - **Begelly:** The 3 non BMV sites were retained in the settlement boundary but not allocated due to their small size – they did not reach the threshold for allocation. Other candidate sites in the settlement could not be taken forward due to flood risk concerns and ecological value matters. This left just Candidate Sites with BMV land available to choose from to identify growth for this Service Village. Please see the Agricultural land Classification Background Paper (Part 1 - page 93) for

further details.

- **Templeton:** There was just 1 non BMV site in this Service Village which was partly retained within the settlement boundary. Other candidate sites with no BMV were ruled out due to highway constraints and relationship to settlement. The site chosen has a small element of BMV. Please see the Agricultural Land Classification Background Paper (Part 2 -page 156) for further details.

g. This worked example illustrates the difficulty in allocating lower grade land in settlements that are targeted for growth but are also constrained by BMV. It also shows that, where possible, development has been directed to sites with lower grade ALC.

5. The references to **Peatland data in GN 1 General Development Policy** will be updated to reflect updated guidance on Welsh Peatlands Data<sup>3</sup>. The sustainability appraisal will also be updated to evidence the Welsh Peatlands Data<sup>3</sup>. This data will be added to PCC's constraints map. The extent of peatland has been assessed using this data. Allocations proposed in the Plan have been constraint-checked and no allocations affect areas of peatland.
6. Policies GN 6 Development Proposals in Pre-Assessed Areas for Wind Energy and GN 42 Protection of Local Nature Reserves (LNR), Regionally Important Geodiversity Sites (RIGS) and Peat Deposits will be updated to consider the step wise approach (PPW edition 12 paragraph 6.4.15, 1a and 1b) and Planning Policy Wales guidance on peatland (PPW edition 12 paragraph 6.4.34). Welsh Peatland Data<sup>3</sup> will be referenced as evidence.

Recommendations		Focussed Change/Edit Ref
A.	Policy GN 1 General Development Policy is proposed for change to reflect the updated guidance on when an ALC survey is required (When a site contains predicted (BMV)). Surveys will be required on allocated sites where there is predicted BMV land as shown on the ALC2 map layers on Data Map Wales.	FC5.GN01.06
B.	Add reference to data provided by the Welsh Government Agricultural Land Use Policy Advisor on predicated grades and survey work in the LDP 2 Deposit Plan Allocations and Agricultural Land background paper.	OE10
C.	Edit the LDP 2 Deposit Plan Allocations and Agricultural Land background paper to amplify how the BMV policy was applied in the Candidate Site Assessment and Sustainability Appraisal.	OE10
D.	Update footnote 25 to reference the Welsh Peatlands Data.	FC5.GN01.07
E.	Add reference to Welsh Peatlands Data into the Sustainability Appraisal.	OE11

<sup>3</sup> Wales Environmental Information Portal - Welsh Peatlands Data <https://smnr-nrw.hub.arcgis.com/apps/d18ef8c74ecc4dc4a0cbf71ab6935ba0/explore>



F.	Policy GN 6 Development Proposals in Pre-Assessed Areas for Wind Energy is proposed for change to reflect the updated guidance on protection of peatland.	FC5.GN06.01
G.	Policy GN 42 Protection of Local Nature Reserves (LNR), Regionally Important Geodiversity Sites (RIGS) and Peat Deposits is proposed for change to reflect the updated guidance on protection of peatland.	FC5.GN42.01

## 4.2 Begelly

### Begelly: Should residential allocation HSG/003/LDP2/01 North of Begelly Farm remain in the Plan? Should Candidate Sites 056 and 100 be considered?

<b>LDP and Other Document References</b>	<ul style="list-style-type: none"> <li>i) Proposals Map Begelly</li> <li>ii) SP 6 Settlement Hierarchy</li> <li>iii) SP 7 Settlement Boundaries</li> <li>iv) SP 12 Maintaining and Enhancing the Natural Environment</li> <li>v) GN 1 General Development Policy</li> <li>vi) GN 2 Sustainable Design and Placemaking</li> <li>vii) GN 16 Residential Allocations (HSG/047/LDP2/1)</li> <li>viii) GN 17 Residential Commitments</li> <li>ix) GN 22 Specialist and Supported Accommodation</li> <li>x) GN 23 Specialist and Supported Accommodation Allocations</li> <li>xi) GN 44 Protection and Enhancement of Biodiversity</li> <li>xii) Candidate Sites' Register (Begelly)</li> <li>xiii) Development Sites and Infrastructure Supplementary Planning Guidance (Begelly)</li> <li>xiv) Outline 11/0687/PA approved 27/03/2015 and Reserved Matters 17/0936/PA approved 26/07/2018.</li> </ul>
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Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
Support for Begelly being recognised as a Service Village in the Settlement Hierarchy which provides opportunities for a range of developments and land uses.	<b>3719/3</b>	<b>G Price (Agent Boyer)</b>
<b>Allocation HSG/003/LDP2/01: North of Begelly Farm –</b> <ul style="list-style-type: none"> <li>i) Support for the allocation including proposed delivery.</li> <li>ii) Support for the Settlement Boundary being drawn as in the Deposit Plan.</li> <li>iii) Support for inclusion of the allocation within the Settlement Boundary for Begelly.</li> <li>iv) A water supply can be provided for this site and the public sewer and Llangdon waste-water treatment works have capacity to accommodate the foul flows from the site.</li> <li>v) My property adjoins the access to the site. It is difficult to pull onto the main road due to the volume of traffic. There have been several near misses.</li> </ul>	2603/49 4119/1 <b>3719/1</b> 3719/4	Dwr Cymru/Welsh Water G Di Francesco <b>G Price (Agent Boyer)</b> G Price (Agent Boyer)

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
vi) There is an issue regarding a right of way, two properties and Stonepitt Holiday Park use the same exit onto the main road. vii) The pavement in Begelly is narrow and uneven making walking difficult. viii) There is very little infrastructure to support additional families – a small shop and small park.		
<b>Candidate Site 056</b> – Resubmitted for consideration for residential development in a logical extension to the Settlement Boundary. Detailed submission and site layout plan are provided.	<b>3719/2</b>	<b>G Price (Agent Boyer)</b>
<b>Candidate Site 100</b> – Detailed submission and proposed layout for the allocation of land for residential development.	<b>4197/1,2,3,4</b>	<b>Thompstone (Agent Evan Banks)</b>
Detailed submission requesting recognition of implemented permission <b>Outline 11/0687/PA approved 27/03/2015 and Reserved Matters 17/0936/PA approved 26/07/2018.</b>	4409/9	Pembrokeshire Living Limited (Agent Lichfields)
Support for the residential commitment North of New Road (ref 003/00040) within the Settlement Boundary of Begelly.	4409/5	Pembrokeshire Living Limited (Agent Lichfields)
<b>Response</b>		
<ol style="list-style-type: none"> <li><b>1. Residential allocation HSG/003/LDP2/01 North of Begelly Farm</b> has been allocated to accommodate a minimum of 46 (100%) affordable houses. The phasing for delivery of the houses is 2023 – 2033. The landowner supports the allocation of the land and its inclusion in the Settlement Boundary. Dwr Cymru/Welsh Water has advised that a water supply can be provided to the site and that there is capacity in the public sewer and waste-water treatment works to accept foul water drainage from the site.</li> <li>Objections to the site allocation relate to highway matters, in particular difficulties gaining access onto the A478 which is the main road running through the village. When consulted on the allocation, the Highways Authority acknowledged the need for a new vehicular access from the site onto the A478 with the need to tie into the pedestrian footpath (pavement) running along the road frontage. The Highway Authority has not raised concerns about pedestrian safety. Any transport-related planning obligations should be used to contribute towards a proposed traffic management scheme for the village which was originally developed to address intermittent footway provision.</li> <li>The owner of the neighbouring property has raised an issue regarding a right of way, but this appears to be a matter relating to the access to Stonepitt Holiday Park and two private houses and unrelated to the proposed access to the allocated site. There are no public rights of way in the vicinity of the site entrance from the road.</li> <li>Begelly is categorised as a Service Village in the Settlement Hierarchy. The Rural Facilities Report details the facilities and service available in the village including a local shop, community hall, pub, playground and place of worship. The Haverfordwest to Tenby bus route runs through the village providing hourly services throughout the day.</li> </ol>		

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
<p>5. Allocation HSG/003/LDP2/01 is allocated for 46 affordable dwellings. The landowner has supported the allocation and proposed delivery of the development from the 2023 to 2033. There are no constraints identified to prevent the site being delivered, as anticipated in the Plan.</p> <p>6. There are two housing sites shown as residential commitments in the village and listed in <b>Policy GN 17 (Residential Commitments)</b>. <b>Site 003/00025 Barley Park Close is a site of 26 houses (including 2 affordable dwellings)</b>, now largely complete. <b>Site 003/00040 North of New Road</b> is a development of 70 houses, half of which (35 units) are anticipated to be delivered within the Plan period. The base date of the Local Development is April 2017. The Housing Land Supply base date has been updated for the Deposit Plan to April 2023. As at April 2023 Site 003/00040 North of New Road had planning permission and is correctly shown as a commitment on the Proposals Map and listed under Policy GN 17 (Residential Commitments). Without a lawful commencement on the site, permission lapsed in 2024. Several 'discharge of condition' applications have been determined by the Council. Formal agreement that a lawful commencement has been made at the site will however require a Certificate of Lawfulness. This is outside the Local Development Plan process.</p> <p>8. 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. There are however, two representations requesting the allocation of additional land for housing in Begelly. Both sites were considered as Candidate Sites.</p> <p>9. <b>Candidate Site 56</b> – This site is located on the western side of the village and is outside the Settlement Boundary. The site was not included as an allocation due to a substantial objection from the Highway Authority about the access to the site along a narrow lane. Representation 3719/2 for the same site proposes a solution to the Highway Authority objection by creating a one-way system. The Highway Authority has responded to this proposal stating that it would not be able to overcome road safety issues with regard to intensification of use, visibility and road safety and that it would still be recommended that the site is unsuitable for further development on highway grounds.</p> <p>10. <b>Candidate Site 100</b> – This site is located on the eastern side of Begelly within a broad river valley which runs to the east of the settlement. The eastern edge of the site is within a flood risk zone, partially zone 2, and partially zone 3, as shown on the Flood Map for Planning. When assessed as a Candidate Site, the reasons for it not being included in the settlement boundary and allocated for development are due to its ecology and there being other more suitable land available for allocation in the village.</p> <p>11. No changes are recommended as a result of these representations.</p>		
Recommendations	Focussed Change/Edit Ref	
A. No changes are recommended as a result of these representations.	N/A	

## 4.3 Cilgerran

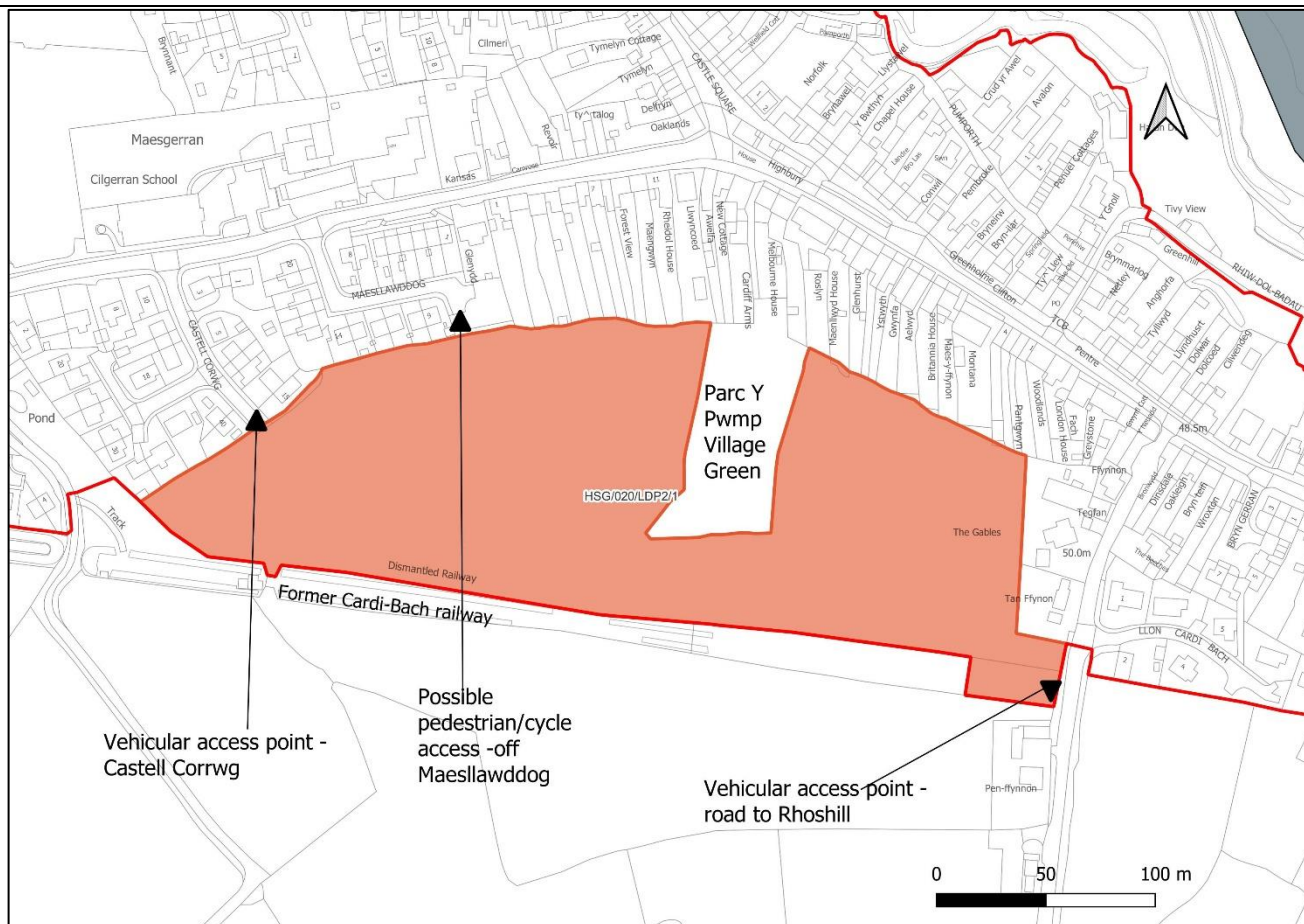
Cilgerran: Is the housing provision for Cilgerran appropriate?		
<b>LDP and Other Document References</b>	i)	Proposals Map
	ii)	SP 7 Settlement Boundaries
	iii)	GN 13 Residential Development
	iv)	GN 16 Residential Allocations
	v)	GN 20 Local Needs Affordable Housing
	vi)	Rural Facilities Report December 2020 with corrections July 2024
	vii)	Candidate Sites' Register and Site Assessment September 2024
	viii)	Financial Viability Report 2024

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
<b>HSG/020/LDP2/1 Land at Tan Ffynnon Fields, Cilgerran:</b> 50 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. Cilgerran 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. <b>(20-unit limit).</b>	2603/39	Dwr Cymru
<b>HSG/020/LDP2/1 = Candidate Sites 238, 239 and 032</b> - Support for three candidate sites based on Welsh Water investing in sewerage infrastructure in Cilgerran – no development should be completed until Welsh Water can accommodate additional dwellings.	1745/3 &4	Cilgerran Community Council
<b>HSG/020/LDP2/1 Land at Tan Ffynnon Fields, Cilgerran:</b> General support for the allocation. However, it is requested that affordable housing requirement be reconsidered and brought into line with GN20.	34438/1&2	A Thomas ( <b>Llyr Evans Planning Ltd (34643)</b> )
<b>HSG/020/LDP2/1 = Candidate Site 238 and 239</b> – Allocation supported as it could offer a solution to current parking problems. Would welcome a mixed development with ample parking – to include parking for existing dwellings. Site needs to deliver community benefit of off-street parking for high street residents.	1745/1	Cilgerran Community Council
<b>HSG/020/LDP2/1 – Candidate Sites 238 and 239 - the Council would welcome a mixed development</b> with rent to buy, affordable and open market as opposed to 100% affordable housing.	1745/1	Cilgerran Community Council

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
<b>HSG/020/LDP2/1 – Candidate Sites 238 and 239</b> - Multiple access points into site to reduce congestion on High Street.	1745/1	Cilgerran Community Council
<b>Candidate Site 032</b> – does not lend itself to development until sites 238 and 239 are delivered. Cilgerran CC oppose the exception site policy for this site. However, if the site is 100% affordable it should be for local needs.	1745/2	Cilgerran Community Council

Response
<p>1. The site allocated “Land at Tan Ffynnon Fields ” referenced as HSG/020/LDP2/1 was submitted for consideration as candidate site (ref. 238). Candidate site ref 239 covers the same area as the eastern part of candidate site 238 and was submitted as a smaller alternative to the larger site. The proposed allocation measures approximately 3.95Ha with a minimum of 50 units planned during the Plan period and a further 40 units beyond the Plan period. The 90 dwellings proposed reflects the densities for residential sites set out in GN 13 (Residential Development) of the Plan. It was estimated that the development would be delivered in the long-term (2028-2033). The indicative affordable housing requirements for the site is 17.5% or 8 units. The landowner has submitted a representation supporting the land allocation in the Plan but has queried the affordable housing requirement.</p> <p>2. <b>HSG/020/LDP2/1 – Candidate Sites 238 and 239:</b> This site was assessed and comments received from a number of statutory and other agencies which can be used in response to some of the issues raised.</p> <ul style="list-style-type: none"> <li>▪ <b>Highways:</b> (See map below for access details). The site has 2 potential vehicular access points – firstly off Castell Corrwg which is currently in Pembrokeshire County Council’s list of roads to be adopted, and secondly an eastern access off the road to Rhoshill. A further pedestrian/cycle access can be created off Maesllawddog, owned by a private individual who has given permission to the site owner to use this access. To ensure connectivity with the existing village, active travel routes should join Castell Corrwg and Maesllawddog then cross Parc Y Pwmp Village Green and end at the Rhoshill road to create north-south and west-east links. A further footpath should be created along the former Cardi-Bach railway to create a southerly link that also provides access to nature, which should link to, and potentially provide part of the route for the aforementioned link. The Highway Authority were further consulted regarding the Community Council’s comments on off-street parking in the settlement and multiple access points alleviating pressure from the High Street (1745/2). Highways would support additional parking within the proposed allocation, open to all residents in the village, with a suggested maximum of 20 additional spaces. This could potentially be located adjacent to the Parc Y Pwmp Open Space. Highways would not be supportive of a larger road to facilitate an alternative traffic route through the settlement. An internal estate road with two access points is required to prevent future ‘rat-running’.</li> </ul>





- Dwr Cymru - Waste water Treatment Works (WwTW) – Dwr Cymru has stated that the local treatment works has limited capacity to accept new flows (ref 2603/39). Dwr Cymru has indicated there is currently a 20-unit capacity at the local treatment works but an upgrade is due to be completed by March 2030. This limit on the site delivery fits with the planned phasing of the site (see Appendix 2 Table B “Anticipated Timing and Phasing of Allocated Sites” on page 223 of the Plan). Therefore, the limited capacity should not affect the delivery of the proposed allocation. The planned upgrade to the treatment works addresses Community Council concerns regarding capacity (1745/3).

### 3. Affordable Housing and Housing Mix: HSG/020/LDP2/1 – Candidate Sites 238 and 239

The landowner (via their planning agent) has expressed concerns over the affordable housing requirement set in the Deposit Plan (ref 34438/1& 2 A Thomas (Llyr Evans Planning Ltd (34643)) as it differs from Policy GN 20 Local Needs Affordable Housing. The affordable housing requirement is based on values submitted by the landowner for the key site viability assessment. The site has been individually assessed based on these figures. The values quoted from GN 20 Local Needs Affordable Housing of the Deposit Plan text refer to a much broader market area where values have been averaged and do not take into account the individual attributes of the Cilgerran allocation.

4. The Community Council has stated it will support a development with a mix of affordable and market housing (ref 1745/1). The Plan’s policies and affordable housing requirement for the site are in accord with this consultation response.

5. **Candidate site 032 “Land at Lon Cardi Bach”** was screened out during the site assessment as it is less well related to the settlement compared to the proposed allocation.

The proposed allocation provides the level of growth appropriate for the settlement. The Community Council objects to this site being 100% affordable. The site will only be approved as an exception site if there is a demonstrable local need for affordable homes. Exception sites can only be developed for 100% affordable housing in perpetuity, to be in accordance with national planning policy (Planning Policy Wales Edition 12 – paragraph 4.2.35). Chapter 4 of Pembrokeshire County Council's current Affordable Housing Supplementary Planning Guidance provides guidance on who can occupy affordable homes (this will be subject to review but likely to contain similar requirements). Paragraph 4.7 states:

*“The social landlords operate local connection policies that apply to rural and urban areas of the County which requires customers to demonstrate they meet certain criteria. Households who demonstrate these criteria are given additional preference in respect of properties advertised for letting with local connection in that area”.*

Recommendations		Focussed Change/Edit Ref
A.	Include additional parking requirements for the site in the proposed Development and Infrastructure Supplementary Planning Guidance.	N/A
B.	No further changes are proposed.	



## 4.4 Clunderwen

### Clunderwen: Is the housing allocation for Clunderwen appropriate, i.e. Residential Allocation HSG/152/LDP2/1 South of Bro'r Dderwen. Should New Site 9 be considered?

<b>LDP and Other Document References</b>	<ul style="list-style-type: none"> <li>i) Proposals Map</li> <li>ii) GN 16 Residential Allocations</li> <li>iii) SP 6 Settlement Hierarchy - Service Village</li> <li>iv) SP 7 Settlement Boundaries</li> <li>v) SP 9 Service Centres and Service Villages</li> <li>vi) GN 13 Residential Development</li> <li>vii) Rural Facilities Report December 2020 with corrections July 2024</li> <li>viii) Candidate Sites' Register and Site Assessment September 2024</li> <li>ix) Local Housing Market Assessment 2021</li> <li>x) Welsh Language Background updated May 2024</li> <li>xi) Agricultural land classification background paper</li> <li>xii) Affordable Housing SPG 2015</li> </ul>
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Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
<p><b>Highway safety concerns - objection to proposed entrance via existing Bro'r Dderwen estate.</b></p> <p><b>Estate entrance</b> - Narrow entrance to estate. New development causing loss of vision due to shadowing at junction to estate. On-road parking blocking entrance to the estate and causing a blind spot (due to a number of houses only having 1 parking space).</p> <p>Too much traffic using one entrance to the estate.</p> <p>Suggested alternative entrance at Llanfallteg with mini roundabout.</p> <p><b>Parking</b> - Car parking on the estate on Saturdays to play football at the nearby park – causing safety problems.</p> <p>Concerns regarding providing sufficient parking for new estate.</p> <p><b>Road and Pedestrian Safety</b> - The 20mph zone is not observed in village causing near misses at the junction.</p> <p>Increased traffic through village and estate road.</p> <p>Impact on elderly and disabled residents of the estate.</p> <p>No footpath access to Narberth to reach services/ facilities – safety issue.</p>	<p>4357/1</p> <p>4363/1</p> <p>4358/1</p> <p>4010/1 &amp; 2</p> <p>4381/1</p> <p>4450/1&amp;2</p> <p>4373/2</p> <p>4436/1</p> <p><b>4435/1&amp;2</b></p> <p>4433/1&amp;2</p> <p>4429/1</p> <p>4425/1</p> <p>4417/1</p> <p>4395/1&amp;3</p> <p><b>4407/1 &amp; 2</b></p> <p>4371/1</p>	<p>Ms M P O Neill</p> <p>G Underwood</p> <p>J Jones</p> <p>H Thomas</p> <p>Cllr S Wright</p> <p>K Harrison (residents of Bro'r Dderwen)</p> <p>K Harrison</p> <p>E Evans</p> <p><b>A Thomas</b></p> <p>C Rone</p> <p>K Johns</p> <p>J Allison</p> <p>M Williams</p> <p>S Cockwell</p> <p><b>H L Jones</b></p> <p>T Jenkins</p>

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
<b>Safety concerns regarding junction within existing Bro'r Dderwen estate</b> to the proposed allocation entrance and narrow estate road with cars parked on road. The (blind) bend is not wide enough for two passing cars. Narrow access will cause problems for emergency services.	4357/1 4363/1 4371/1 4450/1  4373/2 4425/1 4417/1 4395/1 &3 <b>4407/1&amp;2</b>	Ms M P O Neill G Underwood T Jenkins K Harrison (residents of Bro'r Dderwen) K Harrison J Allison M Williams S Cockwell <b>H L Jones</b>
<b>Housing Need</b> - No evidence of housing need – houses up for sale in Clunderwen not being sold. Existing Bro'r Dderwen estate has a number of underdeveloped plots which should be built out first. The allocation is not required as the identified housing need is for 6 houses which has been exceeded by this allocation. Renovate and make use of vacant properties rather than building more homes (ONS figures 10.9% empty properties in Pembrokeshire)	4373/2 <b>4435/2</b> <b>4407/1&amp;2</b> 4010/1 & 2 4450/1  4433/1 &2 4395/1&3 4381/1	K Harrison <b>A Thomas</b> <b>H L Jones</b> H Thomas K Harrison (residents of Bro'r Dderwen) C Rone S Cockwell Cllr S Wright
<b>Concerns over lack of local facilities</b> - No jobs in local area and village has poor transport links, poor facilities and services (police, schools, health, recycling and refuse collection) . Limited Broadband – limited capacity of exchange.	4010/1 4450/1 &2  4373/1 <b>4435/2</b> 4433/1 &2 4429/1 4425/1 4417/1 4395/1&3 <b>4407/1&amp;2</b> 4436/2	H Thomas K Harrison (residents of Bro'r Dderwen) K Harrison <b>A Thomas</b> C Rone K Johns J Allison M Williams S Cockwell <b>H L Jones</b> E Evans
Scale of development will have a detrimental effect on village – which consists of much smaller estates	4010/1&2 4450/1 &2  4373/1 <b>4435/2</b> 4395/1&3 <b>4407/1&amp;2</b>	H Thomas K Harrison (residents of Bro'r Dderwen) K Harrison <b>A Thomas</b> S Cockwell <b>H L Jones</b>
LDP 1 rejected inclusion of the site and it was not included in settlement boundary. Increasing boundaries of the village into agricultural land. Village boundary expanding – which will continue forever.	4450/1  4373/1 4433/1 4395/1 &3 <b>4407/2</b>	K Harrison (residents of Bro'r Dderwen) K Harrison C Rone S Cockwell <b>H L Jones</b>

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
Overhead pylons on the allocated site causing disruption, unsightly and safety concerns for children living nearby – electromagnetic field causing health problems.	4010/1	H Thomas
Concerns with <b>surface water run-off</b> from development – causing pollution in local stream.	<b>4407/1&amp;2</b>	<b>H L Jones</b>
<b>Ecological concerns</b> – loss of habitat and hedgerows. Otters seen on the Llanfallteg road. Loss of birdlife.	4357/1 4363/1 4450/1  4373/1 4436/1 4433/1 4425/1 4395/1&3 <b>4407/1&amp;2</b>	Ms M P O Neill G Underwood K Harrison (residents of Bro'r Dderwen) K Harrison E Evans C Rone J Allison S Cockwell <b>H L Jones</b>
<b>Sewage capacity</b> – Site is crossed by a 225mm diameter sewer. Clynderwen Waste water Treatment Works can accommodate the foul flows from the proposed development site.  Concerns about <b>capacity of local sewage treatment works</b> (overflow at local brook at Gondre shows there may be issues at local treatment works) Concerns about phosphate release into East Cleddau Special Area of Conservation - 41 reported spills in 2023.	2603/2 4357/1 4010/1 & 2 4450/2  4373/1 4433/1 4425/1 4395/1&3 <b>4407/1&amp;2</b>	Dwr Cymru/Welsh Water Ms M P O Neill H Thomas K Harrison (residents of Bro'r Dderwen) K Harrison C Rone J Allison S Cockwell <b>H L Jones</b>
<b>Water Supply</b> – 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 225mm diameter sewer.  Concern about capacity and safety of water supply for existing and new development.	2603/52 <b>4407/1&amp;2</b>	Dwr Cymru/Welsh Water <b>H L Jones</b>
<b>Loss of agricultural land</b> (development should be directed to brownfield sites).	4450/1  4373/2 4395/3	K Harrison (residents of Bro'r Dderwen) K Harrison S Cockwell
<b>Loss of Amenity</b> and open space. Existing houses overlooking proposed allocation – loss view and of house value, loss of light (right to light after 20 years). Loss of amenity and increased air pollution due to increased traffic into the estate. Vulnerable residents – disturbed by the development	4363/1 4373/2 4436/2 <b>4435/2</b> 4433/1 & 2 4425/1 4395/1 & 3 <b>4407/1&amp;2</b>	G Underwood K Harrison E Evans <b>A Thomas</b> C Rone J Allison S Cockwell <b>H L Jones</b>

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
Works traffic and building works causing loss of amenity over a long period of time 5 -10 years and devalue and damage properties and road. New allocation needs to be developed without increasing disruption for existing residents.	4357/1 4373/1 4433/1 4450/1 4381/1	Ms M P O Neill K Harrison C Rone K Harrison (residents of Bro'r Dderwen) Cllr S Wright
Erosion of the <b>Welsh language</b> (reduce rate of development to support Welsh language) Clunderwen is a growing service village and priority should be given to those families who want to invest in Wales, through its language and culture. Loss of village community, values and spirit.	4450/1  4373/2 44362 <b>4435/2</b> 4433/1 &2 4395/1 4407/1&2 4381/1 4010/1&2	K Harrison (residents of Bro'r Dderwen) K Harrison E Evans <b>A Thomas</b> C Rone S Cockwell H Jones Cllr S Wright H Thomas
Provide pedestrian access between old estate and new development	4381/1	Cllr S Wright
Number of dwellings should be reduced in line with Well-Being and Future Generation Act. There should be more space between houses with adequate off-road parking.	4381/1 <b>4407/1&amp;2</b>	Cllr S Wright <b>H Jones</b>
Affordable houses should go to local residents.	4373/2	K Harrison
S106 contributions to improve open space equipment and grounds.	4373/2	K Harrison
Build affordable housing over a longer period-of-time.	<b>4407/1&amp;2</b>	<b>H L Jones</b>
A more suitable site would be at Golwg yr Eglwys <ul style="list-style-type: none"> <li>Land south and west of Golwg yr Eglwys</li> <li>Land west of the A478</li> <li>Land to the north and east of Heol y Gaer</li> <li>Land north, south and east of Gower Villa Lane</li> <li>Land to the north and west of Bro Waldo.</li> </ul>	4010/1 4433/2 4425/1	H Thomas C Rone J Allison
Support for the allocation and associated policies on affordable housing percentage, housing type/mix, settlement hierarchy, viability, minimum number of units in plan period and deliverability of site.	1868/1	S Thomas, B William
Comments on delivery agreement and not being notified of the Deposit Plan.	4433/2 4429/1 <b>4407/1&amp;2</b>	C Rone K Johns <b>H L Jones</b>

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
Suggested new site allocation LDP2/Deposit2/New Site 9 West of Bro'r Dderwen – lack of housing delivery on a number of allocations in other areas of the region means site needed for housing delivery.	4368/1 & 2	<b>Amity Planning (M Southall on behalf of Wales &amp; West)</b>
<b>Response</b>		
<p>1. The site allocated “<b>South of Bro'r Dderwen</b>” referenced as <b>HSG/152/LDP2/1</b> was submitted for consideration as a Candidate Site (ref. 340). The site area measures approximately 2.71Ha with a minimum of 31 units planned during the Plan period and a further 31 units beyond the Plan period. The 62 dwellings proposed reflect the densities for residential sites set out in Policy GN 13 (Residential Development) of the Plan. It is estimated that the development will be delivered in the long-term (2028-2033). The indicative affordable housing requirements for the site is 25% or 7 units. The landowner has submitted a representation supporting the land allocation in the Plan, the suggested timing for delivery and the requirement for affordable housing (Ref 1868/1).</p> <p>2. The site was assessed and comments received from a number of statutory and other agencies which can be used in response to some of the issues raised.</p> <ul style="list-style-type: none"> <li>• <b>Highway Authority</b> - The allocated site has been reviewed by the Highway Authority in light of comments received during consultation (summarised in the table above). No concerns were raised by the Highway Authority regarding the proposal in terms of road safety, increased volumes of traffic nor parking issues. The advice from highways remains the same – see below: <ul style="list-style-type: none"> <li>○ The Highway Authority has required the site access to be taken from the existing turning head at Bro'r Dderwen. The internal access road should connect with the existing footway and re-surfacing to the existing access road may be required. A pedestrian/cycle access and crossing will be needed onto the A478 from the site. An active travel route is required along the western boundary to create a more direct cycle and pedestrian link to the A478. This will require a crossing point as the existing footpath is on the western side of the A478.</li> </ul> </li> <li>• Ecology – No issues with allocating the site were raised. The advice is to retain existing hedgerows and strengthen peripheral hedgerows where lacking at present as an ecological enhancement. A Habitats Regulations Assessment is required due to the proximity to a river.</li> <li>• Dwr Cymru/Welsh Water has stated that they can provide a water supply for the development and the wastewater treatment works can accommodate the foul flows from the site.</li> </ul> <p>3. In response to the other matters raised:</p> <ul style="list-style-type: none"> <li>• <b>Facilities</b> - In the Rural Facilities Report December 2020 the village was assessed with a weighted score of 27 points. The village has sufficient facilities to be categorised as a Service Village. Housing allocations are sought in this category of the settlement hierarchy.</li> <li>• <b>Broadband</b> – A high speed broadband connection will be required for all major residential development (sites greater than 10 dwellings).</li> <li>• <b>Footpath to Narberth</b> – Although there is no footpath to Narberth (approximately 3.6 miles to the south of Clunderwen) a footpath link does exist to the local services within Clunderwen.</li> </ul>		

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
<ul style="list-style-type: none"> <li>• <b>Settlement Boundary</b> – The settlement boundary is reviewed and potentially changed when a new Local Development Plan is prepared and where a need for housing or other development is identified. Edge of settlement boundary locations can come forward for affordable housing.</li> <li>• <b>Local Housing Need</b> – The allocation HSG/152/LDP2/1 reflects the housing need in the local area as shown in the 2021 Local Housing Market Assessment.</li> <li>• <b>School capacity</b> – The Education Department has indicated that there is sufficient capacity in local schools.</li> <li>• <b>Housing delivery</b> – The landowner of the proposed allocation HSG/152/LDP2/1 has stated the site can be developed in line with the housing delivery targets set out in the Deposit Plan.</li> <li>• <b>Disruption, noise and social impacts</b> – disruption caused by the construction of the site can be minimised by use of appropriate conditions to control the time of work and maintaining good site management. The use of the site for residential use is compatible with the neighbouring residential uses.</li> <li>• <b>Loss of amenity</b> - Concerns over loss of amenity and light are matters to be assessed at planning application stage. The application will be assessed in the context of all LDP policies including GN 1 General Development Policy which addresses local amenity.</li> <li>• <b>Open Space</b> – The allocated site will have a requirement to provide on-site open space provision for recreational purposes to meet needs arising within the site under the Local Development Plan policy requirements.</li> <li>• <b>Affordable housing and local communities</b> – 25% of the units in the proposed allocation are required to be affordable. PCC's current Affordable Housing SPG provides guidance on who can occupy affordable homes (this is subject to review but likely to contain similar requirements). It states that social landlords operate a local connection policy where households that meet the local connection criteria will be given preference on first lettings.</li> <li>• <b>Electric Overhead line</b>– A 11kV line crosses the site. Western Power Distribution has stated that these types of lines can be moved to a more suitable location.</li> <li>• <b>Loss of hedgerows and habitat</b> – Planning Policy Wales 12 and the emerging LDP2 state that hedgerows and trees will need to be retained wherever possible. If loss is unavoidable then replacement planting will be required elsewhere. Whilst some loss of habitat is unavoidable the overall net benefit to biodiversity must be positive for a development to comply with national planning policy.</li> <li>• <b>Surface water run off</b> – Sustainable urban drainage plans for the site will require a SuDS Approval Body application to be submitted to the Local Authority to ensure surface water is managed sustainably and doesn't have a detrimental impact on local water quality.</li> <li>• <b>Agricultural land</b> - The site was assessed in Agricultural Land Classification background paper. According to the predictive ALC map on Data Map Wales there is no best and most versatile agricultural land within this site. Planning Policy Wales 12 directs development to these lower agricultural quality areas.</li> <li>• <b>LDP 1 candidate site assessment screened out</b> the current allocation in terms of how it related to the village and its distance to village services at that time. Taking into consideration the more recent development of the site to the north which has almost been fully built out, the candidate site assessment for LDP2 found that the allocation is now the best option for growth in the village. Since the Bro'r Dderwen estate has been further developed the site is now better related to the built form of the village. The site will be linked to local village services by footpath.</li> </ul>		



Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
<ul style="list-style-type: none"> <li>• <b>Welsh Language</b> The updated Welsh Language Background paper identified Clunderwen as a Welsh Language-sensitive area. The allocation has been assessed for its impact on the Welsh language. Development is likely to be for an estimated 8 dwellings per year over 6 years which will enable steady integration into the existing community.</li> <li>• <b>Scale of development:</b> The rate of the development as described above will help to address concerns regarding the impact of the development on the local community character and culture.</li> <li>• <b>Other alternative sites:</b> Of the other sites suggested in the village (ref 4433/1 and 4010/1) only “Land south and west of Golwg yr Eglwys” and “Land south and east of Gower Villa Lane” have been submitted as candidate sites for consideration. As the other sites were not put forward as candidate sites they were not considered for a housing allocation. The two sites put forward were assessed and screened out for the reasons summarised below: <ul style="list-style-type: none"> <li>▪ Land south and east of Gower Villa Lane (candidate site 120) was screened out due to highway and ecology concerns.</li> <li>▪ Land south and west of Golwg yr Eglwys (candidate site 078) was screened out due to its high Agricultural Land Classification and limited highways support.</li> </ul> </li> </ul> <p>4. <b>New site proposal:</b> The “Land south and west of Golwg yr Eglwys” (candidate site 078) forms a small part of the new site proposed by representation <b>4368/1 Amity Planning</b> (New Site 9). 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. Introducing a 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. The proposed housing allocation HSG/152/LDP2/1 is deliverable and provides the level of growth appropriate for the settlement. PCC has already identified sufficient land at Service Village level across its Plan area and is confident of its delivery. The introduction of this further site would risk over-providing against the plan's strategy in that respect.</p> <p>5. <b>Lack of consultation with local community.</b> Consultation Reports (available on PCC website) outline how consultation and engagement was carried out. The Deposit Plan consultation was advertised through the Western Telegraph and through PCC’s website and social media. Community events were run to raise awareness with members of the public, local Councillors and with Town and Community Councils. It is not possible to specifically target each individual householder in Pembrokeshire. Objectors are now on the Local Development Plan mailing list and the Council will be able to correspond directly at future Plan consultation stages.</p> <p><b>Conclusion</b></p> <p>6. <b>Residential Allocation HSG/152/LDP2/1 South of Bro'r Dderwen</b> – is considered by the Council to be appropriate for residential development in the context of professional advice from statutory undertakers and specialists. Objections to the site being allocated have been considered and responded to above. The landowner supports the inclusion of this site in the Plan and allocation for residential development.</p>		

Summary of Issues		Raised By	Name (wish to speak at Examination in bold)
7. <b>New Site 9</b> is not required. 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.			
Recommendations			Focussed Change/Edit Ref
A.	No change to the Deposit 2 Local Development Plan 2 is proposed		N/A



## 4.5 Crundale Opposite Woodholm Close

**Crundale: With reference to land opposite Woodholm Close and at Rhoswell Farm, has the Plan correctly identified existing residential commitments; is the housing allocation of the right scale and location and have infrastructure and highway constraints been addressed in an appropriate manner?**

### **Residential Allocation HSG/029/00014 – Opposite Woodholm Close, Crundale**

<b>LDP and Other Document References</b>	<ul style="list-style-type: none"> <li>i) Proposals Map</li> <li>ii) GN 16 – Residential Allocations</li> <li>iii) GN 17 – Residential Commitments</li> <li>iv) GN 20 – Local Needs Affordable Housing</li> <li>v) GN 45 – Green Infrastructure</li> <li>vi) GN 48 – Green Wedges</li> <li>vii) GN 51 – Protection and Creation of Outdoor Recreation Areas</li> <li>viii) Candidate Sites' Register and Site Assessment</li> </ul>
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<b>Summary of Issues</b>	<b>Raised By</b>	<b>Name (wish to speak at Examination in bold)</b>
<p>Objection to the omission of Candidate Site numbers 267 and 343 from LDP 2, Deposit Plan 2 and to the inclusion of an Amenity Open Space designation in place of some land previously consented for residential development in the same general area.</p> <p>The representations are framed as objections to policies GN 16 (2027/1), GN 17 (2027/2), GN 20 (2027/3), GN 45 (2027/4), GN 48 (2027/5) and GN 51 (2027/6).</p> <p>A detailed submission has been provided, which includes a statement proposing a residential development of at least three phases (potentially more) at Rhoswell Park, Crundale.</p> <p>The statement objects to the omission of Candidate Sites No 267 and 343 from LDP 2, Deposit Plan 2 and to the inclusion of an Amenity Open Space designation in the same general area by that Plan.</p> <p>The planning history of the site is provided, together with a site plan for phases 1 and 2, a location plan for phase 3+, an indicative site</p>	<p><b>2027/1</b></p> <p><b>2027/2</b></p> <p><b>2027/3</b></p> <p><b>2027/4</b></p> <p><b>2027/5</b></p> <p><b>2027/6</b></p>	<p>Mr. and Mrs. Moffat <b>(represented by Agent 3709 Mr. David Haward)</b></p>

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
<p>layout for phase 3+, a location plan for phase 3 and an indicative layout for phase 3.</p> <p>The statement also makes reference to adjacent land uses, exceptional infrastructure costs, development implementation, justification for the proposed larger development and a commentary on LDP 2, Deposit Plan 2.</p>		
<p>Update on matters relating to water supply, sewerage and Wastewater Treatment Works in relation to the residential allocation HSG/029/00014 – Opposite Woodholm Close, Crundale</p>	2603/53	Dwr Cymru Welsh Water

Response
<ol style="list-style-type: none"> <li>1. During the LDP 2, Deposit Plan 1 consultation in 2020, PCC was made aware that abnormal site costs were making the delivery of existing residential planning permissions in this part of Crundale village problematic.</li> <li>2. Planning permissions had previously been granted for a residential development encompassing land at Rhoswell Farm and along the south east frontage of Chapel Road for 15 dwellings. A 16<sup>th</sup> plot was also included in the layout for this site, but was not given planning permission, as it was outside the current (LDP 1) Settlement Boundary. The buildings at Rhoswell Farm have been demolished and a start has been made on the re-development of the site. Appendix A shows the extent of this site in white along the road frontage with a triangular piece of land with plots shown to the south-west.</li> <li>3. A part of the abnormal cost was attributed to the length of the estate road required but further costs were arising from the presence of a 14-inch cast iron strategic trunk water main and the need either to re-locate this or accept a substantial easement within which development could not occur and water company access would be required.</li> <li>4. Broader considerations in Crundale village are that Chapel Road, has attracted a Highway Authority objection and that there is another Candidate Site submission (HSG/029/LDP2/1 – West of Ashford Park) that is without either highway or water main constraints.</li> <li>5. On the basis that the current planning permissions relating to this land did not seem capable of implementation, and in the interests of trying to find a fair solution for the affected landowners, PCC put forward a new proposal in LDP 2, Deposit Plan 2, which recognised the permission on the Rhoswell Park element of the site, but set back the permitted frontage element of the permitted development along the south east frontage of Chapel Road to reflect what had already been committed in numerical terms. The frontage land with the residential planning permission was designated as Amenity</li> </ol>

Open Space and a residential allocation (HSG/029/00014 – Opposite Woodholm Close) was put in place behind this, for 15 dwellings, as a compensatory provision. This was a recognition that much of the previous planning permission was considered to be incapable of being built out without the considerable expense of relocating the water main. It was also a recognition of the highway constraint, where the position at Deposit Plan 2 stage was to accept the number of units already with permission, but nothing further. It should also be noted that a further Candidate Site adjacent to Chapel Road (CS 417 – North of Wallis Park) was rejected outright on highway grounds.

6. The rationale for the above approach was that PCC was attempting to resolve the viability constraint attributed to the length of estate road required for the previously permitted development and the significant cost that would be involved in re-locating the raw water main. It was also a recognition that the previously permitted layout was prepared some years ago and did not appear to have given sufficient weight to various matters including the protection of trees and hedgerows wherever possible and the consideration of ecological matters. Hence, the proposals of LDP 2, Deposit Plan 2 did not ignore or fail to recognise the earlier permissions but rather were put forward to seek an alternative solution that was fair the landowner, recognised the identified constraints and presented an alternative approach that could take account of up-to-date Planning Policy Wales considerations in relation to tree protection and ecology. Essentially, PCC believes that a re-design of the layout at this site would be capable of embedding modern place-making principles.
7. However, the representors, through their agent, have indicated that their preferred way forward is to build out the existing planning permission, which would involve moving the water main to allow the already permitted frontage element of the development (as well the element on the former Rhoswell Farm site) to go ahead as originally envisaged. Recognising the costs involved, they would also wish to see the LDP 2, Deposit Plan 2 allocation remain in the Plan, as a means of offsetting the estate road costs and the costs associated with moving the raw water main. That would allow the original design concept to go ahead as previously conceived, which would not be possible under the LDP 2, Deposit Plan 2 proposal, and provide a further phase of development to help meet the abnormal costs. Under the representors' proposals, the Open Space provision of LDP 2, Deposit Plan 2, would be deleted. The representors also have an aspiration for a phased build-out of the whole field. The maps included as Appendix A and Appendix B to this paper show the representors' ideas of how the layout might work with the existing permissions and a similarly sized allocation (Appendix A) and also for the mooted eventual phased release of the whole field for residential development purposes (Appendix B).
8. Having given the matter further thought, PCC recognises that there are a variety of approaches that could be made to work at this site. Focussed Changes are not proposed at this site, as it is considered that a better approach would be to work through the issues and options at an Examination hearing and seek an independent view from the Examination Inspector on the best way forward.
9. To facilitate that future discussion, PCC has re-contacted Highway Authority colleagues, to check whether there has been any change to the highway advice relating to this site. The outcome of that re-consultation is that the scale of development previously permitted (15 dwellings) is accepted and a further 15 dwellings might also now be possible, served from a single access from Chapel Road. This would be subject to:

- a. Adequate visibility being available at the estate road junction (which they advise is possible); and
- b. A footway being provided to link up to village, potentially through the proposed open space area and behind the existing hedge line, along to Parkway Close, so long as it is available to all users and not just future residents.

The introduction of a 20 MPH speed limit in the village has helped to facilitate that change of view. Hence, there is a little more scope for flexibility on the number of dwellings allowed than was previously the case, although the relaxation of the highway constraint is not sufficient to allow the build-out of the whole field. The availability of an allocated residential site elsewhere in village (HSG/029/LDP2/1- West of Ashford Park) with less constraint is also an important consideration, as is the appropriate scale of future development for a service village.

10. The representation from Dwr Cymru Welsh Water on this matter says that (on the basis of a 15-unit development) a water supply can be provided, and the public sewerage network can accept the potential foul flows from the site. It is noted that Merlins Bridge 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 its Asset Management Plan (AMP) or potentially earlier through developer contributions. There was no reference to the raw water main, but this has been the subject of earlier discussions.
11. To conclude, PCC will welcome a further discuss of this matter at an Examination hearing and will welcome the Inspector's consideration of the best way forward.

## Conclusion

12. No Focussed Changes to LDP 2, Deposit Plan 2, in relation to this this matter, are proposed at this time and the matter will go forward for discussion at an Examination hearing.

Recommendation		Focussed Change/Edit Ref
A.	No Focussed Changes proposed.	N/A

## Appendix A Representer Layout 1



## Appendix B Representer's Layout 2





## 4.6 Gypsy Traveller Need and Provision

Are the Gypsy Traveller Policies and provision appropriate for the Plan area?	
<b>LDP and Other Document References</b>	i) DP SP 4 Gypsy Traveller and Show-people's Accommodation ii) DP GN 24 Gypsy and Traveller Site Allocations iii) DP GN 25 Gypsy, Traveller and Show-people's Sites iv) 2019 GTAA signed off in 2024 v) The Designing Gypsy and Traveller Sites Guidance by Welsh Government 2015 vi) Planning-for-Gypsy, Traveller-and-Showpeople-sites 005/2018 Circular

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
Policy GN 24 identifies allocations totalling 55 pitches, 30 pitches above the level of need. This policy is supported as it meets the needs identified in the Plan/evidence base (2019 GTAA signed off in 2024).	1507/9 <b>34485/30</b>	Welsh Government <b>Pembrokeshire Coast National Park Authority</b>
Whilst the date of the evidence base and relationship to the date of the Examination could raise questions, the Welsh Government considers there is sufficient flexibility, i.e. overprovision of pitches, to provide confidence in that the level of need will be met.	1507/9	Welsh Government
The GTAA 2019 alongside Policy SP4 and Policy GN24 identify potential land for additional sites. There is no certainty regarding the deliverability of these sites. It is evident that any unmet need will only be satisfied with the provision of private sites.	4360/2/3	Travelling Ahead Hayston Developments & Planning Ltd (1975)
The GTAA update for March 2024 refers to a net additional need between 2025 and 2033 of 30 pitches – paragraph 6.4 - these figures are too low.	4360/2/3	Travelling Ahead Hayston Developments & Planning Ltd (1975)
The Plan is not sound as the Gypsy Traveller Accommodation Assessment approved in May 2024 advises that the need of 39 pitches by 2033 are met by existing permissions granted after 2019. There is no need for the allocation at Withybush. Why require 55 pitches?	<b>4454/1</b>	<b>C Maddocks, R Thomas, J Jones</b>
The Welsh Government is content that previous representations have been addressed, and the plan is compliant with the Development Plan Manual and national planning policy. The allocations are shown on the Proposals Map and will need to demonstrate they are constraint-free.	1507/9	Welsh Government
DP SP 4 Gypsy, Traveller and Show-people's Accommodation - Amend typographical errors in Table 2 Gypsy, Traveller and Show-people Need over the Plan Period.	4	PCC Planning Service

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
Policy GN 24 Gypsy and Traveller Site Allocations - Delete reference to a transit site in paragraph 5.131: 'The site Adjacent to Monkton Playing Fields site will provide new pitches <del>and might also have potential for partial use as a transit site should such a need be identified.</del> ' as combining allocations and transit sites is not considered good practice.	16	PCC Planning Service
Policy GN 25 – policy supported	<b>34485/31</b>	<b>Pembrokeshire Coast National Park Authority</b>
Policy GN 25 – Criterion 1 is incompatible with PEDW (2020) guidance and reasoning and should be removed.	4360/1	Travelling Ahead Hayston Developments & Planning Ltd (1975)
<b>GT/095/LDP2/01 Land to the east of Castle Quarry Gypsy and Traveller site, Monkton, Pembroke</b>		
A water supply can be provided for this site. Off-site mains would be needed to connect to the network The public sewerage network can accept the potential foul flows from the proposed development site. Off-site sewers would be needed to connect to the network. Pembroke Dock Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed development site.	2603/77	Dwr Cymru
A survey of residents at the Castle Quarry Site on 27 <sup>th</sup> November 2024 generally showed support for renovations to the existing site, support for the extension to the Castle Quarry Site and the new proposed Monkton Site. Some wished to see the renovations at the Castle Quarry Site prioritised rather than focusing on a new site. The detailed response can be found in the main responses table.	4360/1	Travelling Ahead
<b>Pembroke: South of Monkton Playing Fields GT/095/LDP2/2:</b> Objections raised concerning:		
- Limited access and visibility onto a busy main road B4320 Angle Road	4370/1 4396/1 1744/1	M Thomas C Doyle Pembroke Town Council
- Road is very busy and the 20mph limit is ignored. Traffic calming measures are ignored. Road crossing is not safe. A detailed traffic study is required.	4437/1	H Townsend
- Disturbance to the peace and tranquillity of Monkton Cemetery when visiting deceased relatives.	4370/1 4418/1 4359/1 <b>4366/1</b>	M Thomas A Bearne C Kennington <b>Cllr J Grimes</b>
- The old conduit / watery lane (bridleway) skirts the proposed site which is a sensitive area for endangered species which may be	4418/1	A Bearne



Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
<p>disturbed by being used as an informal access.</p> <ul style="list-style-type: none"> <li>- The historical well of Saint Nicholas which once served Pembroke Castle is on the southern edge of the proposed site.</li> </ul>		
<ul style="list-style-type: none"> <li>- GT/095/LDP2/1 (Castle Quarry Eastern Extension) has been allocated for expansion and should negate the need to allocate additional sites.</li> <li>- There is a significant demand for affordable and social housing in Pembroke and the addition of GT/095/LDP2/2 would not alleviate this.</li> </ul>	<b>4366/1</b> 4396/1 4359/1 4426/1 1744/1	<b>Cllr J Grimes</b> C Doyle C Kennington J Hearne Pembroke Town Council
<ul style="list-style-type: none"> <li>- The site is located in an area with many species of flora and fauna and any development would severely impact on the environmental and natural habitat.</li> <li>- Loss of good quality agricultural land.</li> </ul>	4370/1 <b>4366/1</b> 4396/1 4359/1 4426/1 1744/1	M Thomas <b>Cllr J Grimes</b> C Doyle C Kennington J Hearne Pembroke Town Council
<ul style="list-style-type: none"> <li>- Adjacent to a public cemetery that is close to capacity and could require expansion in the future.</li> <li>- Potential encroachment on the cemetery by stray horses.</li> <li>- Amenity of neighbouring properties adversely affected due to increased traffic.</li> </ul>	<b>4366/1</b> 4426/1 1744/1	<b>Cllr J Grimes</b> J Hearne Pembroke Town Council
<ul style="list-style-type: none"> <li>- Site has direct access to the Watery Lane. This is a bridleway, that extends from The Old Conduit. The Watery Lane is already in a poor state of repair with the Council advising they are not responsible for maintenance. It is inevitable that the lane will also be used for additional access.</li> </ul>	4372/1	A Davies
<ul style="list-style-type: none"> <li>- Fly grazing potential to occur.</li> <li>- Additional traffic near the school.</li> </ul>	4370/1	M Thomas
<ul style="list-style-type: none"> <li>- 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 pre-planning stages. The findings of the HMA would inform the extent of any necessary upgrades. The public sewerage network can accept the potential foul flows from the proposed development site. Off-site sewers would be needed to connect to the network. Pembroke Dock Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed development site.</li> </ul>	2603/80	Dwr Cymru

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
<b>GT/003/LDP2/01 Land west of Kingsmoor Common Gypsy and Traveller site, Begelly</b>		
<ul style="list-style-type: none"> <li>- A water supply can be provided for this site. Off-site mains would be needed to connect to the network. The public sewerage network can accept the potential foul flows from the proposed development site. Off-site sewers would be needed to connect to the network. Langdon WwTW can accommodate the foul flows from the proposed development site.</li> </ul>	2603/78	Dwr Cymru
<ul style="list-style-type: none"> <li>- A survey of residents at the Kingsmoor Common site on the 26th November 2024 generally showed support for new provision but the detail of the layout needs to be considered carefully. The provision should be for those growing up on the site. Can a local letting policy be used? The detailed response can be found in the main responses table.</li> </ul>	4360/2	Travelling Ahead
<b>GT/040/LDP2/01: Land East of Withybush Gypsy and Traveller site</b>		
<p>Objecting to the site's development under Policy SP 4 and GN 24 on the following grounds:</p> <ul style="list-style-type: none"> <li>- Existing occupants have objections to the development of the site which have not been taken into account in the meeting at County Hall. It is a family-based site and are not either Gypsy or Traveller.</li> <li>- Existing residents have fears for their security and concerns for their human rights.</li> <li>- There are highways dangers and the access is not suitable for the volume of traffic (including the Withyhedge site traffic). There has been an accident with a child there.</li> <li>- The site is geographically isolated from services and amenities. There is no pedestrian route or public transport to services such as the doctor's surgery.</li> <li>- The proposal would remove the amenity paddock used by existing families and not provide an alternative.</li> <li>- It is disputed that the Council has vacant possession of the whole site.</li> <li>- Additional pitches should be exclusively for members of families already on the site.</li> <li>- Sites more generally should be accessible and have recreational areas for young families.</li> </ul>	2801/1 & 2	Mr D Llewellyn (lead petitioner on behalf of 34 residents, several businesses operating out of Rudbaxton and the 92 residents of Crundale and District who supported the 2011 petition)
Objecting to the site's development:	4327/1	C Maddocks

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
<ul style="list-style-type: none"> <li>- This is a settled community and although we are from a G&amp;T background we do not mix or co habit with other families within the area.</li> <li>- By extending the site the Council is not considering the current communities' feelings and rights or showing any form of empathy or respect for a settled and content way of life.</li> <li>- There are numerous reasons aired at the County Hall meeting which would go against this site being brought forward.</li> </ul>		
<p>A detailed submission is provided from residents of the Withybush site (three families currently living there) asking that the Withybush Gypsy and Traveller Site to be reconsidered, and this allocation as it is currently proposed, to be removed from the plan. Reasons include:</p> <ul style="list-style-type: none"> <li>- how the residents identify themselves - <i>'we are not gypsy or travellers, as we do not follow the tradition of moving off site to travel for work and then returning to the site'</i>.</li> <li>- Existing residents have fears for their security and do not consider that an extension for 20 additional pitches will integrate well with the existing community.</li> <li>- The Council does not have vacant possession.</li> <li>- If it is to remain then control of occupancy is required: <i>To make this element of the plan sound we suggest the rewording of the policy to read "there is capacity for additional pitches to serve the families already living on the site"</i>.</li> </ul>	4454/1	<b>C Maddocks, R Thomas, J Jones</b>
<ul style="list-style-type: none"> <li>- <b>GT/040/LDP2/01 Land east of Withybush Gypsy and Traveller site:</b> A water supply can be provided for this site. Off-site mains would be needed to connect to the network. The public sewerage network can accept the potential foul flows from the proposed development site. Off-site sewers would be needed to connect to the network. 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.</li> </ul>	2603/79	Dwr Cymru

## Response

1. **Gypsy Traveller Accommodation Assessment 2019 - 2033<sup>4</sup>:** The table below identifies the total need from the Gypsy Traveller Accommodation Assessment 2019. The need figure is derived using the Welsh Government methodology for preparing the Assessment and takes account of Census data (2011 at the time), need from households both inside and outside the County, Council waiting lists, caravan counts and onsite survey work. A total of 39 residential pitches is required (page 34 yellow box), however, 14 pitches have been granted planning permission since 2019 leaving an estimated need for 25 pitches to be provided for. It is useful to note that the sites on which the permissions are granted are unlikely to perfectly match with those where the need was identified. There is no requirement for transit pitches or Travelling Show-people's provision.

### Gypsy Traveller Accommodation Assessment 2019 – 2033 Need and Permissions Granted

	2019 to 2024 Need	2019 to 2024 Permissions Granted	2025 to 2033 Need	2025 to 2033 Permissions Granted	Total Need LDP Period	Total Permissions Granted Nov 2024	Outstanding Need until 2033
<b>Residential</b>	9	14	30	0	39	14	25
<b>Travelling Show-people's</b>	0	0	0	0	0	0	0
<b>Transit Pitches</b>	0	0	0	0	0	0	0

2. The allocated pitches in the Deposit Plan exceeds the residual need of the GTAA 2019 for the following reason. There is likely to be more need emerging during the Plan period. The GTAA 2019 is recently signed off and indicates the need at that date. The 2024 GTAA will commence shortly but is unlikely to be completed until 2027 – still within the LDP 2 time period, but too late to provide evidence to inform the content of LDP 2. Additional need may be identified in the Plan period once the 2024 GTAA results are known. Paragraph 5.6 of the 2019 GTAA advises *'the majority of this increase is based on household growth alone and there are inherent difficulties in using the results of this single survey to predict growth so far in advance. The requirement to undertake a new GTAA at least every five years will result in a far more accurate assessment of need during the plan period.'*
3. The provision of Gypsy Traveller and Showpeople's accommodation is a separate provision to the provision of market and affordable housing.
4. It should be noted that when the Local Development Plan 2 Deposit 2 was published an error was identified in row 5 columns 3, 4 and 5 Table 2, Gypsy, Traveller and Show-people Need over the Plan period (based on the GTAA 2019, with updates. The error is corrected below and highlighted as a part of wider Focussed Change in the Recommendation below.

<sup>4</sup> [https://www.pembrokeshire.gov.uk/objview.asp?object\\_id=11503&language=](https://www.pembrokeshire.gov.uk/objview.asp?object_id=11503&language=) Link to the GTAA 2019 on the Council's website.

30 pitches has reduced to 18 <b>25</b> pitches (2025-2033).  (Planning permission has been granted for 5 additional pitches). and land is allocated for 19 pitches).	39 residential pitches has reduced to 18 <b>25</b> pitches.  (Planning permission has been granted for 14 pitches). and land is allocated for 19 pitches).  0 Travelling Showpeople pitches  0 Transit pitches	<b>Yes</b>  Allocations for ..... pitches.
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5. **Site Provision in Local Development Plan 2 Deposit 2:** An indicative total of 55+ residential pitches are provided for on four sites in the County's planning jurisdiction (see Policy SP4 Gypsy, traveller and Show-people's Accommodation and Policy GN24 Gypsy and Traveller Site Allocations. This provision is in excess of the requirement identified by 30+ residential units. Some representors argue that the level of need is greater and that if this is the case then private sites will be required. Policy GN 25 Gypsy, Traveller and Show-people's sites policy provides the framework for considering such sites.

Site Ref.	Name	Area (ha)	Likely Pitch Nos
GT/095/LDP2/01	Land east of Castle Quarry Gypsy and Traveller Site, Monkton	0.35	4
GT/095/LDP2/02	Adjacent to Monkton Playing Field	2.43	20 +
GT/003/LDP2/01	Land west of Kingsmoor Common Gypsy and Traveller Site, Begelly	0.58	11
GT/040/LDP2/01	Land east of Withybush Gypsy and Traveller Site	1.21	20
<b>Totals</b>		<b>4.57</b>	<b>55+</b>

6. Taking each site in turn and considering the appropriateness of each site's allocation against the representations submitted:
7. **GT/095/LDP2/01: Land east of Castle Quarry Gypsy and Traveller Site, Monkton:** The Council and representatives of Travelling Ahead visited the adjacent allocated site in November 2024. Generally, there was support for additional provision both at this site, which would also assist with re-configuration, and at the site proposed at Monkton.
8. This extension site to Castle Quarry Gypsy Site does, however, lie in the base of a former quarry and there are issues with dampness in the current accommodation. The allocation is also privately owned and in terms of negotiating a value for money price for the site there are concerns regarding deliverability. The purchase is prohibitively expensive, and contamination issues would also need to be addressed. It is considered that the site would have to be compulsorily purchased.
9. In summary, given the uncertainties regarding deliverability of this site and the later addition of an alternative site at Monkton during Plan preparation process **it is proposed to remove**

**GT/095/LDP2/01 Land east of Castle Quarry Gypsy and Traveller Site, Monkton allocation as a Focussed Change.** Policy GN 25 would however, provide a framework for considering an extension to assist with re-configuration in due course if needed.

10. **GT/095/LDP2/2: Pembroke South of Monkton Playing Fields:** In terms of highway access the Highway Authority has not raised any in-principle issues regarding the allocation of the site for development. There is some infrastructure in the highway verge area and a refuge that may need to be moved in conjunction with creation of a new highway access. Also, a visibility splay would be needed, which would require the existing highway vegetation to be removed (or moved back into the site). The Highway Authority has not recommended highway access via the bridleway. Footways into the site from the B4320 would also be required. A traffic statement will be required to support the proposal, but it is unlikely that a detailed traffic assessment will be needed.
11. With regards to speeding the Highway Authority advises: 'drivers are expected to obey the posted speed limit in the area and ensure they are driving appropriately at all times within the vicinity of the pedestrian crossing to ensure there are no road safety incidents.'
12. No external paths are required, only a path alongside the access road. The Designing Gypsy and Traveller Sites Guidance by Welsh Government 2015<sup>5</sup> also advises: *'Roads 3.23 All sites need to have traffic calming measures leading into and through the site. Public roads should have clearly displayed signs requesting cars to slow down for site access.'*
13. The bridleway runs along the southern end of the cemetery and part of the allocation before continuing onwards in a southerly direction. In terms of links to the site the Highway Authority is advising of only one vehicular access point from the B4320 Monkton road. Paragraph 3.26 of 'The Designing Gypsy and Traveller Sites Guidance' 2015 by Welsh Government advises that *'Local Authorities should provide only one access point to the site to prevent non-residents using the site as a through road.'* Paragraph 3.27 of 'The Designing Gypsy and Traveller Sites Guidance' 2015 by Welsh Government advises that *'The site should be connected to the local community by means of a footpath'*. The most direct pedestrian route will be via the B4320 and to avoid the site being used as a through route no direct link to the bridleway on the southern boundary is proposed.
14. The site lies to the south of the B4320 Monkton road with the cemetery to the east and some existing development to the north-west of the site. The site is relatively well contained and benefits from hedge and treelined boundaries. These would need to be retained as part of any proposal coming forward. Paragraph 3.31 of *'The Designing Gypsy and Traveller Sites Guidance by Welsh Government 2015'* also advises that *'The health and safety of children should be a priority when considering boundary arrangements. Site boundaries should be constructed in a way which will minimise the risks to children playing. There should be a 3-metre gap within the inside of all site boundaries as a fire prevention measure.'* This would also create a buffer area between the development and the nearby cemetery.
15. Transit sites: Paragraph 5.131 of the Local Development Plan 2 Deposit 2 refers to the possibility of the site adjacent to Monkton Playing Fields site potentially providing for partial use as a transit site should such a need be identified. The Council's housing department advises that combining a residential site and a transit site is not considered to be good practice. **It is therefore proposed to delete this reference from paragraph 5.131 of the Local Development Plan 2. This will be shown as a Focussed Change.**

<sup>5</sup> <https://www.gov.wales/sites/default/files/publications/2019-03/designing-gypsy-and-traveller-sites.pdf>



16. **Archaeology:** The site is not located within a Registered Historic Landscape and there are no historic assets recorded within its boundary. The potential for development to have a direct impact on archaeological deposits is considered low. There is a holy well – St Nicholas' Well (PRN 3290) just beyond the southern boundary and Heneb recommends that their Historic Monuments department – Dyfed region is consulted on appropriate mitigation to safeguard the setting of this historic asset in the event of development.
17. In terms of the potential for fly grazing the Council announced in December 2024 that Pembrokeshire County Council is teaming up with Dyfed-Powys Police in a bid to tackle a growing problem of horses on public areas more generally in the County. The Council's maintenance team has advised (February 2025) it has constant issues with horses close to the proposed allocation, including fly grazing and tethering. The Designing Gypsy and Traveller Sites Guidance by Welsh Government 2015 paragraph 4.30 also advises that *'Grazing land Local Authorities may consider providing grazing land adjacent to sites, where appropriate. Horse ownership is an important part of Romani Gypsy and Irish Traveller culture. Where Local Authorities consider it appropriate to provide grazing land, they could charge residents who use the land.'* There is sufficient land in the allocation to provide grazing land if required which would help respond to this issue.
18. In terms of capacity of the graveyard with regard to Monkton cemetery (February 2025), although it is nearing full capacity, it is understood that there are no plans by the Council to purchase any adjacent land to extend the grounds as burial provision can be catered for at Llanion and St Michael's cemeteries, both of which are also owned by Pembrokeshire County Council.
19. In terms of numbers of pitches that can be accommodated on part of the site during the Plan period it is considered that the figure should be reduced to 15+ .
20. In terms of deliverability taking account of the alternatives in the locality, this site is deliverable and achievable and is value for money.
21. **GT/003/LDP2/01 Land west of Kingsmoor Common Gypsy and Traveller Site, Begelly:**
22. This allocation has not attracted objection to its development. Residents on site were generally supportive of the allocation. Potential neighbouring properties were concerned about overlooking issues which would need to be addressed as part of a detailed layout.
23. In terms of deliverability the site is owned by Pembrokeshire County Council and is registered as Common. Deregistration of the site is likely to take approximately one year to complete.
24. The development of the most recent extension to the east of this site required a significant amount of ground raising before the site could come forward for development. The proposed allocation shows an initial steep drop but then the site flattens out.
25. **GT/040/LDP2/01 Land east of Withybush Gypsy and Traveller Site:**
26. In terms of consultation, it is agreed the consultation meeting at County Hall did not provide sufficient opportunity for residents to provide comment. An onsite visit was also offered as well.

27. It is agreed that the site is geographically isolated from services and amenities. There is no pedestrian route or public transport to services such as the doctor's surgery. Paragraph 3.21 of *'The Designing Gypsy and Traveller Sites Guidance by Welsh Government 2015'* advises *'The location of a site should enable, not hinder, access to services such as health and education.'* Paragraph 3.32 advises *'...Access – Local Authority residential sites should be located with access to public roads and footpaths leading to the site.'* The design guidance does, however, that acknowledge that the Council may have to go for a best fit scenario: Paragraph 3.22 also advises *'As with all developments, it is likely that Local Authorities will need to follow the 'line of best fit' when assessing potential sites. It may be that none of the potential sites can completely satisfy the guidance in this document.... and in terms of Local Services... 'Ideally located within reasonable distance from education settings, health services and shops. If a site is located, or is going to be located, in a rural area this will not be achievable in many instances.'* The catchment primary school is Spittal VC School. As this is over 2 miles from the site, any pupils attending this school who are statutory school age, would be eligible for transport. The Council does not have any transport to Spittal School (April 2025) so it would offer travel expenses in the first instance. In terms of secondary schools both Haverfordwest High and Ysgol Caer Elen are the catchment schools. They are under 3 miles from the school so residents would not be eligible for free home to school transport. However, if there are spare seats on the bus the Council could offer concessionary school bus passes to travel from the end of the road. Ysgol Caer Elen is also a Welsh medium primary school.
28. The site residents were vociferously opposed to the allocation during the consultation. The objectors advise that it is a family-based site and are neither Gypsy or Traveller and that additional pitches should be exclusively for members of the family already on the site.
29. In terms of restricting occupancy via a local occupancy lettings policy, such an approach currently does not exist. The Housing Department advises that it is exploring such an approach (March 2025). Housing also advises that the site should be reduced in size to focus on re-configuration to bring the site up to standard and to allow only for limited growth.
30. In terms of deliverability objectors do not consider that the County Council has vacant possession of the site. The Property Department advises that the site is owned by the Council and is deliverable.
31. The proposal as proposed in the Deposit Plan would remove the amenity paddock used by existing families and not provide an alternative. The Property Department advises that an alternative can be provided which would provide for a better grazing opportunity.
32. With regard to the issue raised regarding providing recreational areas the Welsh Government guidance <sup>6</sup>advises at paragraph 2.13 that the Sites Capital Grant can be used for the provision of play areas. Paragraph 4.1 of *'The Designing Gypsy and Traveller Sites Guidance by Welsh Government 2015'* advises *'Children's play area 4.1 Due to limited indoor space, the outdoor environment is particularly important to Gypsy and Traveller children. An area for children and young people to play and gather is important, especially if there is not suitable provision within walking distance on a safe route. Each site needs to be considered individually and in the context of local conditions; existing play area provision in the area and the size of the site should be taken into account. Ideally, children living on site will be able to safely access nearby existing play areas utilised by the wider community. However, where this isn't possible sites should include designated play areas.'*

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<sup>6</sup> <https://www.gov.wales/sites/default/files/publications/2019-03/designing-gypsy-and-traveller-sites.pdf>



As there are accessibility issues for the site then onsite provision would need to be considered.

33. Regarding security paragraph 5.3 and 5.4 of 'The Designing Gypsy and Traveller Sites Guidance by Welsh Government 2015' advises *'Designing out crime It is important that residents feel safe and secure on site without feeling isolated or imprisoned. Any new site design should aim to limit the potential for crime. Local Authorities should consult Police 'Designing Out Crime Officers' to ensure security and crime issues are addressed from the outset. 5.4 Site designs should aim to conform to Secured by Design principles<sup>28</sup> to reduce the likelihood of crime. Areas without a clearly defined use are avoided which will reduce acts of vandalism, fly tipping and unauthorised encampments.'*
34. Regarding sewage treatment there are no public sewers in close-proximity and the site lies within the riverine (non-tidal) part of the Cleddau Rivers Special Area of Conservation. A private treatment system will need to be provided and take account of Natural Resources Wales (NRW) advice. This could be achieved by replacing the septic tank serving the existing site, as new packaged treatment plants can often demonstrate lower phosphate outputs with higher foul flows compared to existing septic tanks.
35. Regarding Highway Authority advice, there is no objection, in principle, to the site's development. In terms of options for access the preferred option for Highways would be to use the existing access to the site. However, to avoid disruption to the current residents the approach being proposed is to allow for construction of new pitches away from the existing site. This would need a new access point further to the east of the entrance to existing site. With the benefit of a traffic survey (being planned) the requirements for a visibility splay can be confirmed. Results of the traffic survey are expected (Earliest possible date would be week commencing 5th May (avoiding the May Bank holiday).)
36. In summary, given the isolated nature of the site it is not considered prudent to propose a site for 20 pitches here. **It is proposed GT/040/LDP2/01 Land east of Withybush Gypsy and Traveller Site be reduced in size to accommodate the opportunity to re-configure the existing site and provide for limited growth. This would be proposed as a Focussed Change to the Deposit Local Development Plan.**
37. **Policy GN 25 – Criterion 1: Circular 005/2018:** Planning Policy Wales Edition 12 has a presumption in favour of sustainable development. Factors to be taken into account in establishing the sustainability of sites are set out in paragraph 37 of Circular 005/2018. Paragraphs 38 and 39 advise that first consideration should be for sustainable locations within or adjacent to existing settlement boundaries with access to local services, and that sites in the countryside away from settlements can be considered if there is a lack of sustainable locations. Both Planning Policy Wales and the Circular recognise that there are wider economic, social and environmental dimensions to sustainability.
38. Criterion 1 of Policy GN 25 is consistent with that approach. The Inspectorate's letter to Chief Planning Officers in Wales in December 2018 advises that at appeal stage applicants will be asked *'What efforts have been made to find an alternative site, e.g. approaching Council's housing and planning departments including applications for a pitch on a Local Authority site, estate agents, land-owners, other gypsies and travellers? Written evidence should be provided wherever possible.'*
39. A recently adopted Local Development Plan for Bridgend (Adopted 13th March 2024) also advises (COM8): *Proposals for Gypsy, Traveller and Showpeople sites in the countryside, away from existing settlements, will be permitted where: a) There are a lack of suitable*

*sustainable locations for sites within or adjacent to existing settlement boundaries;* No change is proposed in response to this representation.

<b>Recommendations</b>		<b>Focussed Change/ Edit Ref</b>
A.	Update to take account of representations received and updated information regarding deliverability and capacity issues. Consequently, the Castle Quarry site at Pembroke will be deleted; the Withybush site at Haverfordwest reduced in size and the site at Monkton reduced in terms of the number of units proposed. Table 2 in the reasoned justification to Policy SP 4 Gypsy, Traveller and Show-people's Accommodation will be updated and edited to correct formatting errors. Rectification of an error in row 5 columns 3, 4 and 5 Table 2, Gypsy, Traveller and Show-people Need over the Plan Period (based on the GTAA 2019, with updates). Also update row 2 column 5 to match the update proposed to row 5 column 5 changes.	<b>FC4.SP04.01</b>
B.	Update Policy GN 24 to take account of representations received and updated information regarding deliverability and capacity issues. Consequently, the Castle Quarry site at Pembroke will be deleted; the Withybush site at Haverfordwest reduced in size and the site at Monkton reduced in terms of the number of units proposed. Delete reference to provision of a transit site in conjunction with new pitches as this is not considered to be good practice.	<b>FC5.GN24.01</b>
C.	Amend the Settlement Boundary at Pembroke to take account of the removal of the Castle Quarry site at Pembroke.	<b>FC4.SP07.Pembroke.01</b>
D.	As a consequential amendment extend the Green Wedge at Castle Quarry, Pembroke to include the removed Castel Quarry site.	<b>FC5.GN48.Pembroke.01</b>
E.	As a consequential amendment hard rock safeguarding is required on the area formerly identified as Castle Quarry Gypsy Traveller site extension site - Policy GN 38 Safeguarding and Prior Extraction of Minerals.	<b>ME16</b>
F.	As a consequential amendment the extent of sand and gravel safeguarding requires amendment at the Gypsy Traveller site allocation proposed at Withybush, Haverfordwest	<b>ME18 ME19</b>

## 4.7 Habitats Regulations Assessment

<b>Habitats Regulations Assessment – Responding to issues raised</b>	
<b>LDP and Other Document References</b>	Habitats Regulations Assessment LDP2 Deposit 2 September 2024

<b>Summary of Issues</b>	<b>Raised By</b>	<b>Name (wish to speak at Examination in bold)</b>
I. 1. In general, we support the conclusions of the HRA.	<b>34485/41</b>	Pembrokeshire Coast National Park Authority
II. 2. We are pleased to see a number of references to the Pembrokeshire Coast National Park Management Plan 2020-2024, although we note that it is due to be replaced in early 2025.	<b>34485/42</b>	Pembrokeshire Coast National Park Authority
III. 3. HRA page 3, para-J states: “In respect to recreational impacts, existing mitigation provided by the Pembrokeshire Coast National Park Authority and partners through recreation management initiatives, is sufficient to mitigate impacts resulting from increased recreational use of European sites. As such, no adverse effect to the integrity of the Site will occur in regard to marine and terrestrial recreation.” Further references to recreation management policies from the National Park Management Plan 2020-2024 are made in Table 5.2 of the HRA. We would query the principle of reliance on management by third parties to provide mitigation of existing or novel recreational pressures potentially deriving from proposals outside of the National Park. Furthermore, the National Park Authority’s activities are broadly confined to the National Park area of Pembrokeshire, and therefore have no or limited relevance to mitigation of likely significant effect on European sites outside of this area.	<b>34485/43</b>	Pembrokeshire Coast National Park Authority
IV. P5 (and other instances in the HRA) typo: “Ramsey and St David Peninsula Coast” (replace with “Ramsey and St David’s Peninsula Coast”) P5 (and other instances in the HRA) typo: “Stokhom” (replace with “Skokholm”)	<b>34485/44</b>	Pembrokeshire Coast National Park Authority
V. We are unclear why atmospheric pollution effects have not been considered for more Special Area’s of Conservation (SAC’s), the North Pembrokeshire Woodlands SAC and Preseli SAC appear to be notable omissions.	34450/27	Natural Resources Wales

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
(Table 1.2 Summary of impact pathways resulting in LSE to European sites)		
VI. The Air Quality Section (page 20) states that sites more than 200m of a road are screened out - are traffic associated effects the only air quality impacts under consideration?	34450/27	Natural Resources Wales
VII. If so, why are atmospheric impacts associated with construction and operation of developments not being considered in the same way that associated water quality impacts are?	34450/27	Natural Resources Wales
VIII. The same section states sites with features not affected by pollutants are screened out, yet there is no assessment of the features of protected sites sensitive to atmospheric pollution	34450/27	Natural Resources Wales
IX. Table 3.2 Screening of European Sites (page 51), atmospheric pollution is screened in for Afonydd Cleddau SAC and Pembrokeshire Marine SAC as major roads were located within 200m of the sites, however, Carmarthen Bay Dunes SAC and Northwest Pembrokeshire Commons SAC were screened out for the reason there are a lack of likely commuting routes associated with the allocations.  Why have no other protected sites been considered and why have no other air quality effects associated with the allocations been considered?	34450/27	Natural Resources Wales
X. Section 4, HRA Stage 2 Appropriate Assessment (page 58) The explanation for not including a wider range of European protected sites for further consideration in terms of the Atmospheric pollution impact pathway, is insufficient.	34450/27	Natural Resources Wales
XI. In addition, should agriculture – nitrogen or ammonia from agricultural sources also be included? These have the potential to impact on designated sites. In some areas of Pembrokeshire national modelling (APIS) shows that atmospheric ammonia concentration exceeds the critical level (1ug/m3 annual average concentration) for lichens and bryophytes and is therefore likely/potentially causing damage to the special features of protected sites and ancient woodlands in those areas.	34450/27	Natural Resources Wales

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
<p>XII. The HRA specifies that the Skomer, Stokholm and Seas off Pembrokeshire SPA are excluded because there are no allocations within 10 km. However, it appears that various allocations are within 10km of the SPA boundary along the Castlemartin, (S. Pembrokeshire) coastline. For example, proposals near Lamphey (e.g., HSG/052/00011, HSG/052/LDP2/1) are within ~5km and in and around Pembroke (e.g. HSG/095/LDP2/1,2,4,5) are within 6km.</p>	34450/28	Natural Resources Wales
<p>XIII. We also note that it is not particularly clear and there are inconsistencies in how it is determined which protected sites are included for each allocation screening.</p> <p>For example, HSG/003/LDP2/01 in Begelly is screened in for Carmarthen Bay and Bristol Channel SAC but not Carmarthen Bay SPA despite the protected sites overlapping the same area.</p> <p>Or HSG/096/LDP2/1 in Pembroke Dock does not screen in for West Wales Marine SAC despite the SAC screening in for other developments in the nearby area e.g., HSG/096/00238.</p>	34450/28	Natural Resources Wales
<p>XIV. For Cardigan Bay Appendix B HRA Stage 1 Screening states that:</p> <p>“Grey seals and bottle-nosed dolphins may be disturbed (noise &amp; visual) by increased recreational use of the site via human and boat disturbance. All features, with the exception of sand banks, can be disturbed by casual beach recreation and littering, thus reducing the environmental quality of the site. Increased recreation is listed as a potential pressure to the site. As such, LSE is predicted for grey seal, bottle-nosed dolphin, sea lamprey, river lamprey, reefs, and sea caves.”</p> <p>This impact is included as a Recreation impact however, as it specifically references disturbance, why does Disturbance not also appear as an LSE based on the definitions in Table 2.2 Potential Impacts of Plans and Policies:</p> <ul style="list-style-type: none"> <li>• Recreation: “Habitat degradation due to increased foot traffic.”</li> </ul>	34450/28	Natural Resources Wales

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
<ul style="list-style-type: none"> <li>• Disturbance: "Species disturbance via personnel, machinery, noise, and vibration."</li> </ul>		
XV. We find the reasoning of why an in-combination assessment for consideration of other plans and projects can be ruled out unclear (Chapter 7 para 102-106).	34450/28	Natural Resources Wales
XVI. Water Quality - Water Quality is significant to Pembrokeshire protected sites. Particularly for the Milford Haven outer and inner waterbodies which are only Moderate status under Water Framework Directive (WFD). We stress the importance of ensuring waste systems and pumping stations ability to cope with increased population and development and that consideration is also given to impacts on downstream transitional and marine waterbodies. We welcome the review of Environmental Permits for WwTWs with Dwr Cymru Welsh Water to ensure there is capacity for the two main river catchments.	34450/29	Natural Resources Wales

Response
<ol style="list-style-type: none"> <li>1. Support for the Habitats Regulations Assessment by the National Park Authority is welcomed plus the update regarding the Management Plan. Whilst understanding the point being raised in relation to recreational uses and the role of the National Park Authority Table 5.2 Appropriate Assessment for recreational impacts at terrestrial European Sites highlights a range of mitigation measures including management regimes by various partner organisations (not just the National Park Authority) because that is their role in that location. Given that protected sites are listed where they are within 7km of a proposed allocation in the Plan the impacts are likely to be widely dispersed. Also, the PCC LDP 2 itself concerns itself with the protection of Green Infrastructure which is within the remit of LDP preparation and within the vicinity of many allocated sites which will lessen the impact on protected sites. Plan based HRA is primarily concerned with recreational activities which can reasonably be associated with a typical household, such as walking (which can be local) or visiting a local beach which is most likely going to be in the National Park for Pembrokeshire residents. The National Park is a well-managed resource. Authority staff are familiar with balancing the enjoyment of the Park by visitors with the overarching purpose to protect and conserve the special features of the Park.</li> <li>2. It is agreed that minor edits are needed with regard to the naming of some protected sites as suggested by the National Park Authority. Updating references to the most recently agreed National Park Management Plan would also be beneficial.</li> <li>3. Support by Natural Resources Wales for the approach to water quality in the Habitats Regulations Assessment is welcomed. No change is required.</li> <li>4. <b>Air Quality:</b> With regard to the issues raised in relation to air pollution impacts It is proposed that greater clarity is provided in the methodology to improve the draft HRA by updating: <ul style="list-style-type: none"> <li>- the methodology to incorporate recent JNCC guidance (696) on decision making thresholds;</li> </ul> </li> </ol>

- Appendix B HRA Stage 1 Screening: Initial Review – to capture outputs of updated methodology;
  - Table 1.2 to provide a clear conclusion on screening decision on basis of application of updated methodology; and
  - By including an additional table at Appropriate Assessment stage – that records LSE and AA tests.
5. Track changes are included in an updated Habitats Regulations Assessment to make clear how every site has been considered in relation to credible risks of Likely Significant Effects from air quality impacts, additional text for consideration at ‘methodology’; a clear statement for each site against each criteria in table Appendix B HRA Stage 1 Screening: Initial Review; and an additional to record LSE and integrity tests in main body of report.
  6. With regard to the issue of air quality impacts on sites beyond 200m from the road it is considered to be a reasonable approach to the identification of impact pathways. Air Quality impacts that can be assessed at ‘plan’ level tend to be limited to additional traffic flows from development, to the extent to which it is able to be assessed at plan level. It is usual for plan policies to consider the air quality impacts from generated traffic. No other impacts have been considered. Any additional impacts, from individual developments, may be appropriate to consider at project stage, should individual projects require other permits.
  7. In terms of impacts associated with construction each LDP policy will consider their likely impact pathways. For construction and operation, the HRA has screened in water quality impacts during this phase as forming a credible risk, of a pathway to affect site feature.
  8. Air quality impacts have been identified only from increase traffic flows from plan policies, in view of the fact that a risk has to be real and credible, not hypothetical.
  9. Accepting that there may be short term air quality impacts from construction but case law has confirmed short term transient impacts can be screened out. No additional changes beyond the updates to the methodology and clarity to show pathways to European sites/features required to HRA to address this point. Any operation of individual developments that might give rise to emissions are more appropriately dealt with a project scale HRA.
  10. With regard to the issues raised regarding sites with features not affected by pollutants being screened out, but with no assessment of the features of protected sites sensitive to atmospheric pollution criteria on inherent sensitivities are included in the methodology, as per the Joint Nature Conservation Committee (JNCC) guidance relevant Air Pollution Information System (APIS) reports have been considered in the provision of advice. JNCC Guidance includes consideration of sensitivities in providing advice on the scale of increase in Annual Average Daily Traffic (AADT). The HRA has been updated with track changes to identify the impacts on sites, and the specific features. These updates are based on JNCC Guidance. Updates to the methodology based on JNCC guidance have been carried out. All European sites have been captured, in initial screening stage to show clearly the consideration of each European site within the 10km zone and the criteria that has led to conclusions as to credible risk. Use of scale of residential development (unit) to estimate the likely traffic flows and whether the road will receive significant additional traffic such as to exceed the JNCC 1% threshold has been incorporated. The HRA has been updated to include all European sites in the 10km zone, together with clear determination against criteria. Additional details are provided in a summary table for all sites against air quality impacts, which follows the principles of the JNCC guidance. The JNCC Guidance and the scale of development (as units) in 7.0km is used as an estimate for whether the threshold for exceedance would be met regarding traffic AADT.



11. With regard to the inclusion of agriculture sources from ongoing agricultural activities are properly considered as part of baseline conditions of the site. However, these activities do not form part of the plan that is subject to HRA. The current HRA considers the site condition. The HRA could reference each of the APIS contributions to make clear the relative contribution of livestock to background site conditions. The APIS information is set out in the Appendix to show the relative contribution of road emissions compared to the livestock.
12. Applying the JNCC thresholds, it is suggested that this will not change the outcome of the HRA conclusions. The scale of development is not of a scale that is likely to trigger an 1% exceedance of the European sites.
13. With regard to Skomer, Stokholm and the Seas off Pembrokeshire SPA this designation has now been screened in and the Habitats Regulations Assessment amended.
14. With regard to checking the sites screened the Appendices to the Habitats Regulations Assessment has been checked and consequential amendments made shown in track changes. HSG/003/LDP2/01 in Begelly is now screened for Carmarthen Bay SPA. HSG/096/LDP2/1 in Pembroke Dock Land at Hampshire Drive does not screen in for West Wales Marine SAC as it is greater than 10km away (10.18km). The mitigation measures for recreation pressure are considered to be comprehensive and widespread. However, some changes are proposed in relation to species disturbance and habitat degradation.
15. Regarding in combination effects some additional text is provided to clarify.
16. More generally there are aspects of the report which would benefit from refinement and further clarification. These primarily relate to a shift in focus to better engage with the characteristics and specifics of the sites concerned as viewed through the conservation objectives. There are also opportunities to improve transparency and to better link the HRA report with the specific legal tests which need to be applied.

Recommendations		Focussed Change/Edit Ref
A.	That the edits proposed to the Habitats Regulations Assessment September 2024 shown as track changes be agreed.	Appendix B.5

## 4.8 Haverfordwest Slade Lane

**Slade Lane, Haverfordwest: For the residential development proposed to be delivered at this site during the current Plan period, has the scale of delivery been identified correctly; is the affordable housing provision level set at an appropriate level; and should a key site viability assessment have been prepared?**

### **Residential Allocation S/HSG/040/LDP2/6 – Slade Lane, Haverfordwest**

<b>LDP and Other Document References</b>	ix) GN 16 – Residential Allocations x) GN 18 – Slade Lane, Haverfordwest – S/HSG/040/LDP2/6 xi) LDP 2 Financial Viability Report
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<b>Summary of Issues</b>	<b>Raised By</b>	<b>Name (wish to speak at Examination in bold)</b>
i) A detailed submission is provided detailing changes required to the allocation at Slade Lane, Haverfordwest. This representation records that, for the most part, there is support for the provisions of policy GN 16 at this site, but asserts that more housing could be built during the Plan period than the Plan currently anticipates (368 dwellings rather than the stated 330) and suggests that the proportion of affordable housing, which is set at 83%, is incorrect and should be amended. Also, an element of self-build could be included in the development and this should be referenced.	<b>4393/19</b>	Welsh Government Place Division, Housing and Regeneration Directorate <b>(represented by Agent 4394 Lichfields)</b>
ii) A detailed submission is provided, supporting many aspects of policy GN 18, but also asking for a range of modifications to be made to GN 18, the majority of which relate to matters of detail, as set out in the response.	<b>4393/20</b>	Welsh Government Place Division, Housing and Regeneration Directorate <b>(represented by Agent 4394 Lichfields)</b>
iii) With reference to the viability assessment, there is a concern that the Council has failed to follow due process and that this might undermine the inclusion of this important site. The representor is satisfied that the	4393/18	Welsh Government Place Division, Housing and Regeneration Directorate (represented by Agent 4394 Lichfields)

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
<p>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, Welsh Government and Lichfields would be pleased to work with the Council at the earliest opportunity to ensure that the viability of this important site is fully tested.</p>		

Response
<ol style="list-style-type: none"> <li>Representation 4393/19, policy GN 16, is largely supportive of the allocation of land at Slade Lane, Haverfordwest, for residential and other related development. The primary concerns relate to: <ol style="list-style-type: none"> <li>The 'within plan period' dwellings total, where it is requested that the 330 units recorded in Deposit Plan 2 is raised to 368; and</li> <li>The indicative affordable housing requirement, which Deposit Plan 2 sets at 83% (275 dwellings).</li> </ol> </li> <li>With reference to the former, while PCC notes the change of site ownership and aspiration to build out at a faster rate than Deposit Plan 2 indicates, there has been a long history of non-delivery on this site and the detail of what might happen beyond phase 2 is still being considered, through the master-planning work being led by Lichfields on behalf of Welsh Government. PCC would therefore prefer to retain the 330 dwelling minimum currently in GN 16 for this site, noting that this is a minimum figure and that it does not preclude faster build out within the allocation during the LDP 2 plan period.</li> <li>The affordable housing element of GN 16 for this site does, however, require modification. Policy GN 20 (Local Needs Affordable Housing) identifies Haverfordwest / Merlins Bridge as a Band 3 location. The table in the main policy text suggests an indicative provision of 30% for sites of 100 units + in Band 3 locations, but this does not align with the Viability Report, which suggests that 25% should be the figure. This matter has been investigated, and it has been established that there is a mistake in the Viability Report, which will need to be corrected. The 30% figure, which is derived from the high-level viability testing, is the correct one. The necessary corrections are included in the 'Other Edits' table (Appendix B.4) as change OE20.</li> <li>The Slade Lane, Haverfordwest, site was not the subject of a key site viability assessment, because the site was expected to be developed by an RSL with at least 50% affordable housing, the same reasoning also explaining why Maesgwynne, Fishguard, was not chosen. Also, it is already consented and is currently the subject of master-planning and PCC does not want to prejudge the outcome of that further work, including the ongoing discussions around the scale and location of the new primary school. Nonetheless, an indicative minimum affordable housing provision for the site is needed for inclusion in policy GN 16.</li> </ol>

The Welsh Government's 2024 tender document for the master-planning work indicates an aspiration for the delivery of 50% affordable housing on the Welsh Government owned elements of the site and PCC has re-contacted Welsh Government for confirmation that this remains the intention. The outcome of that inquiry is that it is not, with a lower level of affordable housing provision now envisaged, which means that a key site viability appraisal is now needed to ascertain what the appropriate affordable housing provision should be. Lichfields consultancy, on behalf of Welsh Government, is currently preparing this.

5. As the key sites viability appraisal for this site has only recently been requested and the outcome is not currently known, PCC will set the phase 3 affordable housing provision at 50% as an interim measure, pending further discussion once the key site viability appraisal is to hand – which is most likely to take place at an Examination hearing.
6. Phases 1 and 2 of the site are owned and being taken forward by Pobl housing association. The first phase is fully consented and will deliver 115 dwellings, including 55 affordable dwellings (42 social rent and 13 shared ownership). The second phase proposal is understood to total 103 dwellings, including 54 affordable dwellings. To provide the 330 dwellings minimum for delivery within the Plan period, a further 112 dwellings will be provided in phase 3 and if a 50% affordable housing provision is applied to that figure, it equates to a further 56 affordable dwellings. That gives in total an overall provision on the Slade Lane site of 330 dwellings, of which 165 dwellings will be affordable (50% of the total). It is these figures that are proposed for insertion into the Slade Lane entry for policy GN 16, to replace the figure in LDP 2, Deposit Plan 2 of 83%. These focussed changes are presented as FC5.GN16.Haverfordwest.01.
7. Looking beyond phase 3, it is anticipated that the remainder of the housing provision on the Slade Lane site will be delivered after 2033 and the appropriate affordable housing provision for this further element of development will be decided at a later date.
8. Based on the above, a Focussed Change to policy GN 16, is proposed, to replace the 83% / 275 units figures with 50% / 165 dwellings. To make it clear how the new figures have been calculated, a breakdown of provision in each of the three phases proposed for delivery during the Plan period will also be set out. Overall, the provision is higher than the 30% suggested by the high-level viability testing of the Viability Report, reflecting what was understood to be the Welsh Government aspiration for a higher proportion of the dwellings to be affordable, but accepting that a lower figure is now being sought and will be informed by a key site viability appraisal. In accordance with the Council's approach to testing viability to date it is not considered appropriate to use the high-level viability testing as a basis for modifying GN 16 – the appropriate way forward is to use a key site viability assessment for that purpose.
9. The representation also indicates that the Slade Lane site could potentially include an element of Self-Build, so the right-hand column entry for this site can be changed from 'Not Known' to 'Yes'. This change forms a part of FC5.GN16.Haverfordwest.01.
10. With reference to representation 4393/20, policy GN 18 (which proposes the master-planning of the Slade Lane site), the representor has commented with a range of observations, some supporting the current policy text and others suggesting modifications. Where modifications are proposed, these are in most cases accepted and will be presented as Focussed Changes to the Plan. The changes proposed are:
  - a) adding some further text regarding the importance of providing a range of types, tenures and sizes of houses on the site;

- b) agreement in principle to including provision for community-led housing and self-build plots within the scheme;
- c) providing a caveat to the reference to 'other community facilities' by adding 'if required';
- d) reflecting the need for a range of different types of open space; and
- e) amending the final sentence of the first paragraph of the policy to make specific reference to active travel - adding the words 'together with integrated proposals for active and sustainable travel' to the end of that sentence.

These changes are set out in FC5.GN18.Haverfordwest.01. Related FC5.GN18.Haverfordwest.02 updates on the master-planning work that has been commissioned by Welsh Government.

11. The aspect of the GN 18 representation that PCC does not agree with is the suggestion that an indicative framework plan could be included as part of the LDP policy for clarity. LDP 2, Deposit Plan 2, Appendix 3, sets out the anticipated items of SPG that will support LDP 2. One item is a Slade Lane Masterplan, which would be the document currently commissioned from Lichfields by Welsh Government. It is suggested that this might provide a basis for submission of future planning applications and for the preparation of SPG post adoption of LDP 2. It remains PCC's view that this provides the best way forward. Clearly, a Masterplan agreed by Lichfields / WG and PCC would carry less weight in the planning process than an adopted SPG that had been subject to its own public consultation. Lichfields suggest that the Masterplan would not need to be specifically adopted as SPG, but PCC can see some advantages of doing so, particularly given that the delivery of the later phases will not be for a while, which provides ample time for consultation on a Masterplan presented as an SPG document.

## Conclusion

12. To address the issues raised, Focussed Changes to the Plan are proposed, as set out in FC5.GN16.Haverfordwest.01, FC5.GN18.Haverfordwest.01 and FC5.GN18.Haverfordwest.02.
13. In summary, the Focussed Changes proposed are as follows:

### **FC5.GN16.Haverfordwest.01 – Policy GN 16 – Residential Allocations – Slade Lane, Haverfordwest -**

Amend the GN 16 entries for the Slade Lane site at Haverfordwest to reflect consented / proposed provision of affordable units on phases 1 and 2 of the development and the Welsh Government previous aspiration to build out subsequent phases based on a 50% affordable housing provision (but noting the caveats recorded above in this regard). Also amend the 'Potential for Self-Build' indication to say 'Yes'.

Amend the policy GN 16 table entries for S/HSG/040/LDP2/6 - Slade Lane, Haverfordwest, as follows: Indicative Affordable Housing Requirement - Percentage **83% 50% (48.0 % phase 1, 52.0 % phase 2 and 50.0% phase 3)**; Unit Number **275 165 (55 phase 1, 54 phase 2 and 56 phase 3)**. Potential for Self-Build - **Not Known Yes**

### **FC5.GN18.Haverfordwest.01 – Policy GN 18 – Slade Lane, Haverfordwest – S/HSG/040/LDP2/6 –**

Amend various aspects of GN 18 to reflect various aspects of the representation from Lichfields on behalf of Welsh Government regarding the future development of the Slade Lane site in Haverfordwest.

Modify the GN 18 Slade Lane Haverfordwest policy text follows: The Slade Lane, Haverfordwest, residential allocation forms an element of a site that will be masterplanned to provide residential development, **providing a range of types, tenures and sizes of housing on site which might include community-led housing and self-build plots, a range of different types of** open space, a new primary school, school playing fields and other community facilities **(if required)**, together with integrated proposals for **active and** sustainable travel. The first two phases of the site, primarily for residential development, are being taken forward by Pobl housing association and much of the remainder (although not all) is now owned by Welsh Government and will also be delivered for new housing along with other complementary land uses. The size and complexity of this site requires a co-ordinated approach to be taken to its development, with a view to creating a high quality and well-designed environment for its future residents. Welsh Government is leading on the preparation of a masterplan for the entire site, which it is hoped to take forward as Supplementary Planning Guidance to LDP 2 post plan adoption.

**FC5.GN18.Haverfordwest.02 – Policy GN 18 – Slade Lane, Haverfordwest – S/HSG/040/LDP2/6 –**

Amend paragraph 5.109 to reflect the fact that the Masterplan has now been commissioned and work on this is underway.

Modify paragraph 5.109 (policy GN 18 reasoned justification) as follows: Welsh Government is the owner of much of the remainder of the site has ~~indicated that it intends to~~ **commissioned** the preparation of a masterplan for the whole site, which will include residential elements and also other related development proposals, including public and amenity open space, sustainable drainage systems (SuDS), a new primary school including playing fields, areas protected for their nature conservation value and all matters relating to sustainable access **and active travel**.

Recommendation		Focussed Change/Edit Ref
A.	Agree – Focussed Changes needed	FC5.GN16.Haverfordwest.01, FC5.GN18.Haverfordwest.01 and FC5.GN18.Haverfordwest.02  (Also noting Other Edit OE20 relating to the Financial Viability Report)

## 4.9 Housing Policies GN 15 20 21 22 23

### Is the Plan taking the appropriate approach to affordable housing provision, supported housing provision, housing mix and space standards more generally?

<b>LDP and Other Document References</b>	<ul style="list-style-type: none"> <li>i) GN 15 Housing Mix, Second Homes and Short-term Holiday Lets, Space Standards and Requirements for Lifetime Homes Standards</li> <li>ii) GN 20 Local Needs Affordable Housing</li> <li>iii) GN 21 Exception Sites for Local Needs Affordable Housing</li> <li>iv) Local Housing Market Assessment 2021</li> <li>v) Financial Viability Report 2024</li> <li>vi) Register a Service Care Inspectorate Wales<sup>7</sup></li> <li>vii) Specialist Housing referencing<sup>8</sup></li> </ul>
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Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
<p><b>Policy GN 15:</b> 1. Is there a clear appreciation of viability regarding these requirements?</p> <p>2. Clarify if the Council is seeking adherence to the housing mix set out in the LHMA. An approach that conflates household size with the size of the dwelling should be avoided as it restricts choice when purchasing in the open market.</p> <p>3. In respect of Criterion C, it appears to seek a mix of residential use types e.g. secondary and short-term as part of any residential development. We consider that this criterion would benefit from redrafting to ensure greater clarity to control short-term lets and second homes and define what is meant by 'appropriate mix'.</p> <p>4. In order to ensure that the LDP maintains flexibility throughout the Plan period, we consider that Criterion D should be amended to refer to "Lifetimes Homes Standards or equivalent..."</p> <p>5. The requirement to build dwellings in accordance with identified space standards is accepted, although Criterion E should set out the</p>	<b>4393/11</b>	Welsh Government Place Division, Housing and Regeneration Directorate Lichfields (4394)

<sup>7</sup> [Register a service | Care Inspectorate Wales](https://www.careinspectorate.wales/register-service)<https://www.careinspectorate.wales/register-service>  
[https://www.gov.wales/sites/default/files/publications/2024-10/registering-a-care-home-for-children\\_0.pdf](https://www.gov.wales/sites/default/files/publications/2024-10/registering-a-care-home-for-children_0.pdf)

<sup>8</sup> <https://www.gov.uk/guidance/housing-for-older-and-disabled-people> - explains the different types.  
[West Wales CP Older Peoples Housing Need Assessment HousingLIN-Final.pdf](#) – report referred to in the RJ of Policy GN 22.  
<https://www.housinglin.org.uk/Topics/type/An-assessment-of-the-demand-for-specialist-housing-and-accommodation-for-older-people-in-Wales/> An assessment of the demand for specialist housing and accommodation for older people in Wales 01/01/20  
<https://www.rpb.org.uk/capital-strategy/> capital programme for development Regional Partnership Board July 2023 West Wales



Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
space standards to which new development should comply.		
Detailed terminology changes to the wording of <b>Policy GN15</b> - the current wording of Policy GN15 is restrictive in respect to criterion D. It is considered that, given the current wording of the text, any subsequent planning application that did not precisely and literally accord with the provisions of the Policy text (as currently worded) would not be in accord with the policy, and the Plan. The policy wording 'should' rather than 'must' has been accepted and adopted into various policies for other neighbouring authority Plans.) - linked to representations on allocations at Johnston and Milford Haven.	34550 6/7	<b>L Greggain &amp; Co Ltd GJP Planning (4358)</b>
<b>Policy GN 15:</b> A detailed submission is provided setting out the justification for <b>a lifetime home standard on housing development</b> . Accessible and adaptable homes should be the benchmark for all developments, and not just a requirement for social housing (as per Welsh Development Quality Requirements 2021). The small additional cost would ensure that we only support the building of homes that are inclusive and supportive of lifetime wellbeing. <b>It is therefore suggested that additional requirement (M4(2), which is broadly equivalent to the "lifetime homes standard" is included to the maximum extent possible on any new developments of 5 or more homes, unless there are site-specific constraints that mitigate against this.</b>	4	PCC Social Care
Detailed submission requesting the re-wording of <b>Policy GN 15</b> . Draft policy GN 15 sets out criteria for residential development and short-term lets and recognises the importance of ensuring that the needs of local communities are met. Whilst it is important to ensure that local needs are met, this policy might be too limiting and so a balance should be secured by seeking to meet needs at a wider rather than local level. In the same way as representations have been made with respect to emerging policies SP 9 and GN 13, needs should be at an appropriate level in order to capture the level of housing need that exists and to ensure that this can be distributed in a sustainable manner that supports the wellbeing of existing settlements and communities. Pembrokeshire Living Limited considers the most appropriate level to do this would be at Housing Market Area (HMA) level -	4409/3	<b>Pembrokeshire Living Ltd Lichfields (4409)</b>

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
this would also ensure consistency with PPW. However, the first paragraph of policy GN 15 specifically restricts to meeting needs of the local community. The HMAs in Pembrokeshire should be defined in the Plan, in accordance with the Welsh Government's Undertaking Local Housing Market Assessments guidance 2022.		
<p><b>Policy GN 15:</b> A detailed submission is provided. While we support the principle of improving accessibility in housing, the blanket application of a 20% Lifetime Homes requirement is excessive, undermines viability, and duplicates existing regulations.</p> <p><b>Policy GN 15</b> criterion E states that "All residential development must be built in accordance with identified space standards". While we do not object to the use of space standards generally, we are concerned that the adoption of local space standards could differ and conflict from those proposed to be set nationally. The use of local standards would therefore not fit with the national standards to be set and consulted upon over the initial years of the Plan period.</p>	34657/3	<b>M Owens, A Owens, A Owens and J Owens Highlight Planning (4263)</b>
Points D and E of <b>Policy GN 15</b> refer to space standards with reference to the Lifetime Homes Standards and Welsh Development Quality Requirements 2021 (WDQS). Clarification of the Space Standards should be provided.	4415/1	<b>Persimmon Homes West Wales</b>
<p><b>Policy GN 15:</b> All new-build residential development on sites of 5 or more units must provide a minimum of 20% of properties built to Lifetime Homes Standards and in addition, wheelchair user dwellings will be supported; The supporting text refers to Lifetime Homes standards is a requirement of Welsh Development Quality Requirements 2021, Home Builders Federation (HBF) considers this is confusing, <b>which standard is being required?</b> E. All residential development must be built in accordance with identified space standards, The HBF questions which space standards, they should be named in the policy [ HBF presumes it's the ones within WDQS].</p>	1533/3	Home Builders Federation
<b>Policy GN 20: There is an issue within the degree to which GN20 expands upon the calculation of the commuted sum considered necessary.</b> It is not clear what Band 1 developments are expected to provide in housing contributions. <b>It is recommended that the</b>	4377/11	Ateb Stantec(4376)

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
<b>structure of the policy be simplified, and a commitment be made to a robust monitoring and review process to track the policy's impact and effectiveness as well as reflecting market conditions.</b> Should the mechanism not be altered, a simplified way of calculated the commuted sum would benefit smaller developer enterprises.		
<p><b>Policy GN 20:</b> Where a sustained positive change in the financial viability of development can be demonstrated through monitoring, the local authority will seek a higher percentage contribution towards affordable housing. The HBF considers this to be far too vague a policy which would make it difficult for developers to plan ahead, as the level of Local Needs Affordable Housing could be changed at any time.</p> <p>The current wording only allows for higher contributions. What happens if viability changes to make the scheme less viable; will there be an equivalent reduction in the affordable requirement?</p>	1533/4	Home Builders Federation
<p><b>DP Appendix 4: Monitoring Framework:</b> Allocations and GN 20 Local Needs Affordable Housing – A review of affordable housing requirements is triggered by a 5% average house price rise. This should be amended to also take account of build cost increases as it is not just the sales price of a house which affects the viability of a scheme.</p>	1533/6	Home Builders Federation
<p><b>Policy GN 20:</b> Indicative targets for affordable housing are set out in policy GN 20, which is based on the Financial Viability Report undertaken by Burrows-Hutchinson Ltd (July 2024). There are specific inconsistencies between the Council and National Park Authority Local Development Plans for split settlements: Cosheston, Hook, Houghton and Llangwm, Carew, Milton and Pleasant Valley and Lamphey.</p>	34485/29	Pembrokeshire Coast National Park Authority
<p><b>Policy GN 20:</b> There is an inconsistency between the two LDPs regarding the transfer values of affordable homes from developers to an RSL. The National Park's policy sets the transfer value at 42% of the Welsh Government's Acceptable Cost Guidance (ACG). PCC proposes to set transfer values at a higher rate of 55% of 2021 ACGs. PCC should provide evidence that 55% is affordable for RSLs to ensure the policy approach</p>	34485/29	Pembrokeshire Coast National Park Authority

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
does not impact negatively on the delivery of affordable homes.		
<p><b>Policy GN 21:</b> Support. Exception sites are essential to enable affordable housing, as they are more likely to be sold by a landowner on the assumption of a higher land value than for agricultural use. Para. 5.123. Reference to the ability of a Community Land Trust to facilitate affordable housing is welcomed but that is not the only enabler. <b>Suggest insert at the beginning of the penultimate sentence of para. 5.123:-</b> Along with Charitable Trusts they allow a form of community-led housing.....Statement of fact that Charitable Trusts are used to facilitate community led housing in addition to Community Land Trusts.</p>	4408/1	PLANED
<p><b>Policy GN 22:</b> A detailed submission is provided setting out a justification to <b>include a policy approach to the development of children's homes.</b> They are:</p> <ul style="list-style-type: none"> <li>• to meet local need, and are expressly supported by the social care department of the council.</li> <li>• that notwithstanding other usual requirements about location and extent of development, specifically allow an exclusion in respect of children's homes that are not-for-profit, to enable development of sites which do not adjoin a development boundary, without any restriction about requirement to re-use or extend existing buildings – where an existing development of any size and nature already exists on the plot.</li> <li>• Allow development close to an existing development, but without being contiguous to the development boundary, where this would not produce a significant adverse impact to the general nature and amenity of the surrounding open country.</li> <li>• Enable small children's home to be treated as being treated as presumed to be acceptable where LDP usage or existing usage is noted as class C3.</li> <li>• Specifically include children's residential as meeting any planning requirement that a property is available for other restricted use (e.g. social housing).</li> </ul> <p>If this not accepted in full, we would also like consideration for the Residential allocation in Llandissilio to be extended to incorporate possible C2 usage.</p>	1/2	Social Care

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
<p><b>Policy GN 22:</b> A detailed submission is provided setting out a justification to include a policy approach to enable the development of care homes and extra care housing other than those identified sites:</p> <ul style="list-style-type: none"> <li>• Where they will meet local need, and are expressly supported by the social care department of the council.</li> <li>• Where age-restriction is applied for as 55+, that this will specifically automatically cover younger adults with an identified care or support need up to 10% of the allocation.</li> <li>• A presumption that a small amount of housing for key-workers may be included in any scheme, but that these will be subject to suitable restrictions to prevent them from leaking into the wider residential market (e.g. inclusion within a Community Land Trust).</li> <li>• Inclusion of additional services and facilities that would contribute to the general well-being of residents would be considered favourably, even where if they stood on their own they may not fall within that planning designation – e.g. well-being hubs, children's nursery, restaurant facilities, etc.</li> </ul>	3	Social Care
Emerging policy GN 22 supports new specialist or supported accommodation where a need has been identified and where criteria are met. This provides a positive framework for the delivery of specialist or supported accommodation within Pembrokeshire. More detail is provided in the original submission.	4409/10	Pembrokeshire Living Ltd Lichfields (4409)

Response
<ol style="list-style-type: none"> <li>1. <b>Viability Requirements</b> for the Local Development Plan 2 are set out in the Financial Viability Report 2024 which can be found in the evidence base on the Council's website.</li> <li>2. <b>Policy GN 15 - Overall Housing Mix:</b> The Council's approach is set out in paragraph 5.94 of the Local Development Plan 2 regarding how housing mix will be considered including reference to the latest Local Housing Market Assessment (this document will be reviewed during the life of the Local Development Plan) and information from the Housing Register. Also, viability can play its part in the final mix decided. 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 information available at the point of application for example where a high requirement for one-bedroomed flats may not recognise longer term needs for the growth of households.</li> <li>3. 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. Although paragraph 2.29 of the Local Housing Market</li> </ol>

Assessment 2021 comments on the greater proportion of larger homes (4 bedrooomed properties or more) in Pembrokeshire this does not preclude their provision, albeit the need for such properties may not be as 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 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. 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.

4. **Policy GN 15 – barrier free housing:** Paragraph 4.2.13 of Planning Policy Wales advises: *Planning authorities should also identify where interventions may be required to deliver the housing supply, including for specific sites. There must be sufficient sites suitable for the full range of housing types to address the identified needs of communities, including the needs of older people and people with disabilities. In this respect, planning authorities should promote sustainable residential mixed tenure communities with 'barrier free' housing, for example built to Lifetime Homes standards to enable people to live independently and safely in their own homes for longer.* The Local Housing Market Assessment (LHMA) 2021 paragraph 6.31 advises: *Overall, the requirement for 10,901 adaptable homes implies that a notable uplift will be required to the number of homes that meet this standard currently, and that by the end of the plan period around about 18.0% of the total stock should be available that meet this criterion.* New build provision of both affordable and market housing provides an opportunity to achieve an adaptable home standard such as Lifetime Homes. It is noted that the target of 18% is for the total stock and the implications of this target for existing properties is difficult to assess. At paragraph 6.34 of the Local Housing Market Assessment 2021 it advises that: *'Overall, the requirement for 2,425 wheelchair user dwellings will mean that by the end of the plan period, around about 4.0% of the total stock should be available to meet this criterion.'* **Paragraph 5.99 of the reasoned justification to Policy GN 15 requires updating to reflect the published 2021 Local Housing Market Assessment.**
5. On this basis the Policy requires under criterion D) that all new build residential developments on sites of 5 or more dwellings must provide a minimum of 20% of properties built to Lifetime Homes Standards and, in addition, wheelchair user dwellings will be supported. Paragraph 5.101 of the Local Development Plan 2 Deposit 2 advises that the requirement for 20% such properties on sites of 5 or more has been included in the viability testing.
6. As suggested by one commentator the introduction of the word 'should' rather than 'must' would undermine the policy which sets a minimum threshold of 20% Lifetime Homes Standard for which the Plan has been viability tested. No change is proposed. **Including a reference to 'or equivalent' is considered appropriate as standards change over time.** The link below shows how English Building Regulation Standards are similar in approach to the Lifetime Homes Standards.<sup>9</sup> Welsh Government may for example further update building regulation standards in due course to align with Lifetime Homes Standards.

<sup>9</sup> [Accessible-Housing-Standards-2015-WEB.pdf](#) Comparison of Part M 4 Category 2 with Lifetime Homes Standards...Whilst we welcome the improvements, in Habinteg's view, some issues remain that, if addressed, would enhance the practical use of the building by the widest range of people.



7. In terms of affordable housing provision Welsh Development Quality Requirements 2021 Creating Beautiful Homes and Places: Preface advises: The standard <sup>10</sup> will be applied in full, to all publicly-funded affordable housing schemes submitted to Welsh Government at “concept” stage for technical scrutiny from 01 October 2021. New affordable homes delivered through planning agreements (under section 106 of the Town and Country Planning Act 1990) and planning conditions will only be required to meet the Appendix A and Appendix B “**space requirements**” for agreements entered into after 01 October 2021.
8. Appendix A to the Welsh Development Quality Requirements 2021 advises *Homes should be of sufficient size to meet the needs of occupants, have a convenient layout for everyday living and have adequate circulation space. **Space requirements will be met where:***
- The dwelling provides the Gross Internal (floor) Area (GIA) and built-in storage area set out in Appendix B.
  - Accessibility requirements will be satisfied by designing dwellings to meet the Lifetime Homes Standards as published by the Joseph Rowntree Foundation.  
<http://www.lifetimehomes.org.uk/pages/revised-design-criteria.html> ...

Space Standards	WDQR*	WDQR* Appendix A	Lifetime Homes in WDQR* Lifetime Homes in Policy GN15 (5 or more market dwellings)	WDQR* Gross Internal Floor Space Appendix B	Building Regulations M4 ***
Social Rented (Publicly Funded)	100%	100%	100%	100%	100%
Affordable S106/condition	N/A	100%	100%	100%	100%
Private	N/A	N/A	20%	N/A	100%

\*<https://www.gov.wales/sites/default/files/publications/2021-08/development-quality-requirements-for-housing-associations.pdf> [Welsh Development Quality Requirements 2021](#) Page 3 2d) refers to Homes needing to meet the space standards in Appendix A and Appendix B.

\* See also Appendix A to this paper which provides a useful summary of the Welsh Government space requirements in full for Affordable Housing via S106 agreement and/or condition as set out in Welsh Development Quality Requirements 2021 Creating Beautiful Homes and Places.

\* and \*\* <https://www.lbbd.gov.uk/sites/default/files/2022-09/Lifetime-Homes-Standards-Checklist-April-2015.pdf>

\*\*\*[building-regulations-guidance-part-m-access-to-and-use-of-buildings.pdf](#)

9. Wales Building Regulation requirements lie outside the planning policy framework. It is however useful to note that they include the requirements for dwellings regarding accessibility both internally and externally at ground floor level. Part M [building-regulations-guidance-part-m-access-to-and-use-of-buildings.pdf](#) ii. Dwellings (a) so that people, including disabled people, can reach the principal, or suitable alternative, entrance to the dwelling from the point of access; (b) so that people, including disabled people, can gain access into and within the principal storey of the dwelling; and (c) for WC provision at no higher storey than the principal storey. ‘Principal storey’ is defined in Requirement M4.

<sup>10</sup> <https://www.gov.wales/sites/default/files/publications/2021-08/development-quality-requirements-for-housing-associations.pdf>



10. The M4(2) Category 2: Accessible and adaptable dwellings standards are currently applicable in England (February 2025).
11. This level of provision overall should result in a higher than 20% per site provision of Lifetime Home Standards where affordable housing is required on site and 20% of the market provision on sites of 5+ is already expected. To expect a greater amount would require re-visiting the Financial Viability Report 2024 and the current evidence would not suggest a greater requirement is currently justified.
12. **Paragraph 5.99 also requires editing to refer to the requirements set out in the Local Housing Market Assessment 2021:** Paragraph 6.31 of the LHMA advises that 'Overall, the requirement for 10,901 adaptable homes implies that a notable uplift will be required to the number of homes that meet this standard currently, and that by the end of the Plan period around about 18.0% of the total stock should be available that meet this criterion.' Paragraph 6.34 advises that 'Overall, the requirement for 2,425 wheelchair user dwellings will mean that by the end of the Plan period, around about 4.0% of the total stock should be available to meet this criterion.'
13. Regarding **Policy GN 15 Criterion E: With reference to clarifying which standards are being referred to, it would be beneficial to include a table illustrating the requirements as set out above between paragraphs 5.100 and 5.101.**
14. **Regarding reference to the English space standards in the first sentence of paragraph 5.101 this is an error and should be deleted.** ~~'5.101 The Council has used the English nationally prescribed space standards as a basis to inform the testing of viability on housing sites.'~~
15. **Policy GN 15 Criterion C** - the representor asks that this criterion be redrafted to ensure greater clarity to control short-term lets and second homes and define what is meant by 'appropriate mix'. Paragraphs 5.95 to 5.98 explain the approach that is intended. The Council also intends to prepare supplementary planning guidance.
16. **Policy GN 20 Local Needs Affordable Housing** - It is agreed that some edits are required. Monitoring of the Local Development Plan may necessitate a future review of the affordable housing requirements, but this would have to be carried out through a formal review of the Plan. **The first two sentences of the final paragraph of the Policy regarding re-visiting percentages should be deleted as adjustments to affordable housing requirements will need to be assessed through the formal Plan Review procedures.** This is proposed as a focussed change. Also, Appendix 4 of the Monitoring Framework includes triggers for potentially reviewing policy. These are proposed for a focussed change as well.
17. Planning authorities are required to formally review their plan every 4 years. This is the opportune time to consider viability issues in the round. There are many variables to be considered and new initiatives such as changes in building regulations to taken on board. A monitoring framework is proposed under Focussed Changes which will consider the outcome of affordable housing policy requirements being applied to applications in practice and seeing if the requirements are being met and if not what is the reason.
18. Differences in approach to viability between the National Park Plan area and the remainder of the County are set out in Financial Viability Report July 2024, which is included in the Council's evidence base. The assumptions used by the Council differ from those used by the National Park

Authority. Matters that will influence differences in approach include more up-to date data on house prices (which are rooted in new developments in the Council's planning jurisdiction); differing assumptions regarding land values; and updated figures on build costs etc. Also, the transfer costs to Registered Social Landlords differ – (discussed further below). To strive towards greater compatibility (which is more likely with common timetables) would require a common methodology although geography will still play a part in price differentiation. The National Park area was excluded from the identification of Housing Market areas.

19. **Policy GN 20 and Commuted Sums:** Regarding the issue with the degree to which Policy GN 20 expands upon the calculation of the commuted sum this is recognised. The Council will need to review its current approach set out in its supplementary planning guidance as the methodology used for deriving the requirements are a subset of the overall Financial Viability Report assumptions at the time. A different approach to assessing viability is now being used under the Financial Viability Report 2024. It is recognised that the approach should be easy to understand and operate by smaller developers.
20. **Policy GN 20 and 55% of Acceptable Cost Guidelines** - this has been included in the assumptions used to prepare the Financial Viability Report 2024. This percentage has been used by the County Council under its current Local Development Plan and supporting supplementary planning guidance. The use of 42% of Acceptable Cost Guidelines 2021 will in any case need to be reviewed as it is based at a point in time and does not take account of changes in costs of building and other changes in the housing market since that time.
21. In addition, paragraph 5.11 of the Financial Viability Report advises that *‘Transfer values for affordable housing in Pembrokeshire, are based on 55% of the Welsh Government’s Acceptable Cost Guidance (ACG) for social rented tenure; and 70% of market value for intermediate tenure. The rate of 55% for new social rented homes is higher than that applied by most other planning authorities in Wales, who will typically use 42% of ACG. Welsh Government has not reviewed the ACG rates that include a value for the land on which the new home is built, since 2021. Although more recent ACG’s have been published excluding the value of each plot, a decision has been taken (for the purposes of all the viability assessments covered by this Report) to base the transfer values for new social rented properties on 55% of the 2021 ACG’s including land. It is recognised that the 2021 rates have been eroded to some extent by build cost inflation since then; but the values generated by this formula are still higher than 42% of the 2021 ACG’s (including land) adjusted for inflation. In other words, this formula will have the effect of narrowing the gap between transfer values for social rented property in Pembrokeshire and the rates that have applied in most other local authority areas.’*
22. **Policy GN 22 and Children’s Homes:** The planning system is not the only regulatory regime relevant to children’s homes. There is also guidance that care providers should follow when registering and operating a children’s home (including the suitability of locations through location assessments). ‘Guidance for registering a care home for children October 2024’ has been published by the Care Inspectorate Wales (CIW). The regulations and statutory guidance under the 2016 Act set out the requirements for all care homes. This guidance provides advice on specific considerations for location, layout and design when setting up a care home service for children. The premises must be located, designed, and equipped to meet the specific needs of the children for whom the service is intended. Paragraph 6.3 advises *‘The location of a care home for children is a critical consideration in ensuring children feel safe, secure and are supported to lead an active and full life within the community. Service providers must ensure the location of the premises is suitable to achieve the aims and objectives of the service as set out in the statement of purpose.’* Paragraph 6.4 advises: *‘As part of the location assessment service providers should consult the local authority where the home will be located and consider publicly*

*available local data, such as local crime statistics, consult with relevant local services, undertake a risk assessment, and develop risk management strategies. CIW will ask for evidence of these assessments having been carried out during the registration process. CIW's good practice consideration checklist provides additional guidance.'* Paragraph 6.5 advises '*Ease of access to the local community and relevant facilities, such as education, health, employment, and leisure, as well as access to public transport must be taken into account. Where public transport is limited, the service provider must consider how they will facilitate community access.'*

23. Paragraph 6.6 advises: '*Children's attachment to, and inclusion in, their community is essential for their development of identity, security, and sense of belonging. Some children's care homes may have a rural or isolated location in line with the aims and objectives for the type of service they wish to provide, and for some children this might be a preferred option. However, for most children a well-connected care home which is integrated into the local community will have a positive impact on their well-being.'*
24. Whilst it may appear that a children's care home could fall under either C2 or C3 use, case law has found that children could not form a household on their own and therefore where carers do not reside at the premises, the use class will fall within C2. (North Devon District Council v First Secretary of State [2003] EWHC 157 (Admin)) In the majority of (but not all) cases, care providers will not reside at the premises and so most children's homes will come under C2.
25. The Policy as written reasonably reflects the objectives of the Care Inspectorate Wales Guidance set out above with proposals guided to locations that are well provided with services. The conversion or adaptation of a building, albeit in a countryside location is also allowed. All that is left then is to allow for the potential for new build in a rural setting in exceptional circumstances. It is proposed to add the following text at the end of Policy GN 22 Specialist and Supported Accommodation:

**Exceptionally a new-build children's home away from settlement boundaries in countryside locations will be permitted where satisfactory evidence is provided that:**

- **There are no suitable opportunities in the local area through the re-use or conversion of existing buildings;**
- **The location chosen is in line with the aims and objectives for the type of service the provider wishes to provide.**

26. An additional paragraph is also proposed at the end of the reasoned justification of Policy GN 22 Specialist and Supported Accommodation

**Regarding the provision of children's homes the proposal must be located, designed, and equipped to meet the specific needs of the children for whom the service is intended (Guidance for registering a care home for children October 2024). As part of the location assessment service providers are required to consult the Strategic Commissioning Team in the local authority where the home will be located and consider publicly available local data, such as local crime statistics, consult with relevant local services, undertake a risk assessment, and develop risk management strategies. Care Inspectorate Wales will ask for evidence of these assessments having been carried out during the registration process. Ease of access to the local community and relevant facilities, such as education, health, employment, and leisure, as well as access to public transport must be taken into account. Where public transport is limited, the service provider must consider how they will facilitate community access. The Guidance also advises that children's attachment to, and inclusion in, their community is essential for their development of identity, security, and sense of belonging. Some children's care homes may have a rural or isolated location**

**in line with the aims and objectives for the type of service they wish to provide, and for some children this might be a preferred option. However, for most children a well-connected care home which is integrated into the local community will have a positive impact on their well-being. The planning authority will consult with the Strategic Commissioning Team in the local authority on the justification provided for requiring a rural or isolated location where new build is proposed.**

27. **Policy GN 22 & 23 Supported Accommodation:** The Local Development Plan provides for allocations for Specialist and Supported Accommodation under Policy GN 23. In addition, Policy GN 22 sets out a criteria-based policy for the provision of Specialist and Supported Accommodation both within and well related to a settlement boundary. The policy's reasoned justification refers to the 'Assessment of Specialist Housing and Accommodation Need for Older People in West Wales', November 2018 and 'Housing and accommodation needs assessment for people with learning disabilities in West Wales to 2037 as identifying the needs that the policy aims to meet. Figure 1 of the first report provides a typology of older people's housing and accommodation, ranging from moving from existing housing for example by downsizing or relocating for lower maintenance or moving to more adaptable homes or cohousing, 50+ housing and sheltered housing. These are banded in what is referred to as C3 General Needs Housing. The second part of Figure 1 refers to Specialist Housing and Care Homes which can be either C3 or C2 depending on the level of care and these include extra-care, retirement villages, residential homes nursing homes, hospitals and hospices.
28. The implications for provision are highlighted:
- The need to provide for a mix of housing types and tenures including providing the opportunity to downsize and include specialist provision;
  - If residential care is to decline, then include extra care housing;
  - Include care-ready housing, without care on sites where individuals can be visited with ease;
  - Existing sheltered housing improved to provide better support;
  - Older peoples housing schemes that are catering for people living with dementia – a housing/nursing hybrid;
  - Co-housing initiatives for older people; and
  - Adaptation of existing homes.
29. The table included is derived using the 'SHOP@' model and typically uses the 75+ population as the average age benchmark for most likely use of age designated for specialist housing and accommodation for older people (table 1).
30. The difficulty with planning for these needs in a more prescriptive way is understanding how they can be translated to a more local level. The report itself advises: This is a desktop exercise using secondary data to produce high level estimates of future demand for specialist housing and accommodation for older people. Therefore, this assessment should be treated as a guide to future demand for specialist housing and accommodation for older people.
31. At a strategic level, the Local Development Plan can provide for housing requirements where identified land is available and can be viably delivered. Here the level of affordable housing delivery is tested depending on housing market conditions etc., the identified need – Local Housing Market Assessment, and what the viability testing can absorb regarding housing standards demands for example. Policy GN 20 Local Needs Affordable Housing can provide for affordable housing requirements more generally in Market Areas. Policy GN 15 Housing Mix, Second Homes and Short-Term Holiday Lets, Space Standards and requirements for Lifetime Home Standards sets out requirements at a Plan level in terms of mix, tenure and standards for housing layouts. Supplementary Planning Guidance can also set out prescriptions regarding

affordable housing provision (tenure, number of bedrooms required, including key worker expectations) more explicitly.

32. At the more detailed planning application stage the expertise of the housing authority is also used to refine the more generic expectations with the benefit of Officers' knowledge of existing provision for various types of accommodation including wheelchair accessible requirements. Social Services advice should be part of that too, depending on the expertise required. Affordable housing provision is normally publicly funded or cross subsidised by the developer. The housing authority/social services department can also secure land to provide for development types. Beyond the requirements set out in generic policies of the Plan and the housing allocations (for C3 uses) and the specialist housing allocations which is the primary focus of Policy GN 22, the planning authority does not have sufficient evidence to specify in greater detail as to when and where further specialist housing may be required. It can, however, use the criteria-based policies of the Plan to enable such provision as spending priorities crystallise. For example, at present The West Wales Regional Partnership Board Capital Strategy July 2023 sets out in Appendix 5 Strategic Priorities for up to 10 years. For Pembrokeshire there is reference to a Fishguard Health and Wellbeing Centre which could be considered under Policy GN 29 Community Facilities. The Council is also dealing with a representation as part of this consultation regarding the potential provision of such a facility at the Maesgwynne housing allocation site in Fishguard. The Strategy advises that further scoping is needed. The redevelopment of Haverfordia House is referred to which can be accommodated within the policy framework of the Local Development Plan, in particular GN 13 Residential Development. A care facility at Pembroke Dock involves the repurposing of residential units adjacent to the Community Hospital. The refurbishment of accommodation at St Ishmaels for Children and Young People is listed along with the refurbishment of property at Rock Farm.
33. The table included in the reasoned justification of Policy GN 22 (Figure 4) refers to figures that can also be found in the document entitled: 'An assessment of the demand for specialist housing and accommodation for older people in Wales 01/01/20'.
34. An annexe to the report provides built examples of provision referred to in the Table and this can be used determine whether the Local Development Plan can facilitate these types of requirements.
35. On reviewing the accommodation types likely to come forward the Plan's policy framework is sufficiently flexible to consider such proposals as they come forward. Two edits are required however to ensure compatibility with Policy GN 21 Exception Sites for Local Needs Affordable Housing:
- Criterion 1 of Policy GN 22 advises 'New facilities are within or ~~well related to~~ **immediately adjoining** a settlement boundary .....
  - Add a sentence at the end of the Policy wording to advise: **Market housing proposals will not be permitted outside settlement boundaries.**
36. **Age restriction:** Regarding the more specific queries regarding age restrictions the planning authority would be reliant on the advice of colleagues in the housing department and social services department on the appropriateness of such restrictions. The planning authority would normally only be concerned with retaining housing as affordable housing and retaining that housing in perpetuity for local need for example or understanding the nature of the care being provided by the facility so that its use class can be considered.

37. **Additional services:** The request for the inclusion of additional services and facilities that would contribute to the general well-being of residents can be addressed by Policy GN 29 Community Facilities which permits community facilities in locations where they can best serve their community. This would mean that proposals coming forward would need to show the role these proposed facilities will play in the functioning of the accommodation. Depending on the scale proposed there may be a need to impose conditions on the grant of permission for such facilities to restrict their use to persons residing at the site where it is necessary to protect the vitality and viability of nearby retail centres. Key worker accommodation could also be considered as part of the proposal.
38. In terms of consulting with housing and social services colleagues, it is proposed to explicitly refer to this in the reasoned justification.
39. It is proposed to split the first sentence of Policy GN 22 Specialist and Supported Accommodation as follows and place emphasis on the requirement to evidence need: **New, or extensions to existing, specialist or supported accommodation will be permitted where the following criteria are met: x. a local need for such provision has been satisfactorily evidenced and supported by the local authority Strategic Commissioning Team.**
40. Add the following sentence at the end of paragraph 5.124: **To ensure local need has been satisfactorily evidenced, the planning authority will consult with the housing, social and health services on the appropriateness of proposals coming forward under this policy (and linked Policies dealing with allocations for housing, the development of community facilities and applying standards for how housing is laid out) to ensure that the provision is meeting Pembrokeshire's strategic needs for accessible housing, supported and specialist housing.**

Recommendations		Focussed Change/Edit Ref
A.	Include a reference to ' <b><u>or equivalent</u></b> ' after reference to 'Lifetime Home Standards' in criterion d) of Policy GN 15 is considered appropriate as standards do change over time.	FC5.GN15.03
B.	<b>Policy GN 15:</b> Paragraph 5.99 The Council has identified an ageing population as a key issue for LDP2. Alongside the trend for increasing numbers of over-65s is a trend for an increasing need for properties to be adaptable and potentially accommodate wheelchairs. <del>The Local Housing Market Assessment 2022 identifies that there will be a significant increase in the proportion of the population with a disability between 2017 and 2033.</del> Paragraph 6.31 of the Local Housing Market Assessment 2021 advises that <b><u>'Overall, the requirement for 10,901 adaptable homes implies that a notable uplift will be required to the number of homes that meet this standard currently, and that by the end of the Plan period around about 18.0% of the total stock should be available that meet this requirement'.</u></b> On this basis, 20% of properties on sites of 5 or more must be built to Lifetime Homes standards. Where market properties are proposed on a site, the percentage requirement will apply to the market properties specifically as Lifetime Homes standards is a requirement of Welsh Development Quality Requirements 2021. Lifetime Homes standards ensure that two-storey properties have a standard wheelchair-accessible ground-floor and that the	FC5.GN15.01

	stairs are straight to potentially accommodate a stair lift without a need for a bespoke track. Bungalows built under these standards have a wider turning circle in the hall areas. Ensuring an appropriate mix of properties to meet the needs of the population is a critical element of ensuring that the Council meets the requirements of the Health and Well-being Act. <del>In addition, the Local Housing Market Assessment 2022 predicts that by 2036, there will be a requirement for 4.1% of the total housing stock to be wheelchair accessible and homes built to wheelchair accessible standard will be supported. In addition, paragraph 6.34 of the Local Housing Market Assessment 2021 advises that ‘Overall, the requirement for 2,425 wheelchair user dwellings will mean that by the end of the Plan period, around 4.0% of the total stock should be available to meet this requirement.’</del>																									
C.	<p>Policy GN 15: Include the following table between paragraphs 5.100 and 5.101:</p> <table><tr><th>Space Standards for Residential Development</th><th>WDQR*</th><th>WDQR* Appendix A</th><th>Lifetime Homes in WDQR*  Lifetime Homes in Policy GN15 (5 or more market dwellings)</th><th>WDQR* Gross Internal Floor Space Appendix B</th><th>Building Regulations M4</th></tr><tr><td>Social Rented (Publicly Funded)</td><td>100%</td><td>100%</td><td>100%</td><td>100%</td><td>100%</td></tr><tr><td>Affordable dwellings via S106/condition</td><td>N/A</td><td>100%</td><td>100%</td><td>100%</td><td>100%</td></tr><tr><td>Private Market dwellings</td><td>N/A</td><td>N/A</td><td>20%</td><td>N/A</td><td>100%</td></tr></table> <p>*Welsh Development Quality Requirements 2021</p>	Space Standards for Residential Development	WDQR*	WDQR* Appendix A	Lifetime Homes in WDQR*  Lifetime Homes in Policy GN15 (5 or more market dwellings)	WDQR* Gross Internal Floor Space Appendix B	Building Regulations M4	Social Rented (Publicly Funded)	100%	100%	100%	100%	100%	Affordable dwellings via S106/condition	N/A	100%	100%	100%	100%	Private Market dwellings	N/A	N/A	20%	N/A	100%	FC5.GN15.02
Space Standards for Residential Development	WDQR*	WDQR* Appendix A	Lifetime Homes in WDQR*  Lifetime Homes in Policy GN15 (5 or more market dwellings)	WDQR* Gross Internal Floor Space Appendix B	Building Regulations M4																					
Social Rented (Publicly Funded)	100%	100%	100%	100%	100%																					
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Private Market dwellings	N/A	N/A	20%	N/A	100%																					
D.	<p><b>Policy GN 15</b> - Reference to the English space standards in the first sentence of paragraph 5.101 is an error and should be deleted. <del>‘5.101 The Council has used the English nationally prescribed space standards as a basis to inform the testing of viability on housing sites.’</del></p>	FC5.GN15.04																								
E.	<p><b>Policy GN 20</b> - Delete the first two sentences of the last paragraph of the policy: <del>The authority may seek a higher percentage contribution on any site where local circumstances and/or recent developments in the area suggest it would be financially viable. Where a sustained positive change in the financial viability of development can be demonstrated through monitoring the local authority will seek a higher percentage contribution towards affordable housing.</del> The provision of affordable housing below the target figure may be appropriate in exceptional circumstances, where this is supported by economic viability evidence, and it can be demonstrated that there have been significant changes to viability since the original viability testing of individual housing allocations and high-level residential viability testing for the Plan as a whole.</p>	FC5.GN20.01																								
F.	<p>Amend the trigger for further action for Policy GN 16 and Policy GN 20 in the Monitoring Section of the Plan by deleting the trigger commencing on the last row of page 247 of the Plan: <del>Should average house prices increase by 5% above the base price of 2023 levels sustained over 2 quarters then the Authority will consider other triggers identified in the Affordable Housing SPG &amp; may conduct additional viability testing &amp; modify the targets</del></p>	FC6.App04.01																								



	<p><del>established in GN 16 &amp; GN 20.</del> This will mean that that this whole row is deleted.</p> <p>Edit the Trigger point in row 3 column 5 for Policy SP3 Affordable Housing Target on page 246: <u>If <del>the</del> total number of dwellings built is <del>less than</del> 25% below <del>the</del> target of 125 <b>dwellings per annum</b> for 3 years running. Add the following to row 3 column 5 for Policy SP3 Affordable Housing Target on page 246: <b><u>If the reasons for this affordable housing target not being met are as a result of the outcome of independent financial viability assessments then this aspect of affordable housing delivery, in particular, will require particular focus through the Annual Monitoring process.</u></b></u></p>	
G.	<p><b>Policy GN 21:</b> Insert at the beginning of the penultimate sentence of para. 5.123:- <b><u>Along with Charitable Trusts</u></b> <del>T</del>they allow a form of community-led housing.....</p>	FC5.GN21.01
H.	<p><b>Policy GN 22:</b> It is proposed to add the following text at the end of Policy GN 22 Specialist and Supported Accommodation:</p> <p><b><u>Exceptionally, a new build children's home away from settlement boundaries in countryside locations will be permitted where satisfactory evidence is provided that:</u></b></p> <ul style="list-style-type: none"> <li>- <b><u>There are no suitable opportunities in the local area through the re-use or conversion of existing buildings.</u></b></li> <li>- <b><u>The location chosen is in line with the aims and objectives for the type of service the provider wishes to provide.</u></b></li> </ul>	FC5.GN22.01
I.	<p>An additional paragraph is also proposed at the end of the reasoned justification of Policy GN 22 Specialist and Supported Accommodation</p> <p><b><u>Proposals for the provision of children's homes must be located, designed, and equipped to meet the specific needs of the children for whom the service is intended (Guidance for registering a care home for children October 2024). As part of the location assessment service providers are required to consult the Strategic Commissioning Team in the local authority where the home will be located and consider publicly available local data, such as local crime statistics, consult with relevant local services, undertake a risk assessment, and develop risk management strategies. Care Inspectorate Wales will ask for evidence of these assessments having been carried out during the registration process. Ease of access to the local community and relevant facilities, such as education, health, employment, and leisure, as well as access to public transport must be taken into account. Where public transport is limited, the service provider must consider how they will facilitate community access. The Guidance also advises that children's attachment to, and inclusion in, their community is essential for their development of identity, security, and sense of belonging. Some children's care homes may have a rural or isolated location in line with the aims and objectives for the type of service they wish to provide, and for some children this might be a preferred option. However, for most children a well-connected care home which is integrated into the local community will have a positive impact on their well-being. The planning authority will consult with the Strategic</u></b></p>	FC5.GN22.02

	<b><u>Commissioning Team in the local authority on the justification provided for requiring a rural or isolated location where new build is proposed.</u></b>	
J.	<p>In criterion 1 of Policy GN 22 advise ‘New facilities are within or <del>well related to</del> <b><u>immediately adjoining</u></b> a settlement boundary .....</p> <p>Split the first sentence of Policy GN 22 Specialist and Supported Accommodation as follows and place emphasis on the requirement to evidence need: <b><u>New, or extensions to existing, specialist or supported accommodation will be permitted where the following criteria are met:</u></b>  <b><u>x. a local need for such provision has been satisfactorily evidenced and supported by the local authority’s Strategic Commissioning Team.</u></b></p> <p>Add a sentence at the end of Policy GN22 wording to advise: <b><u>Market housing proposals will not be permitted outside settlement boundaries.</u></b></p> <p>Add the following sentence at the end of paragraph 5.124: <b><u>To ensure local need has been satisfactorily evidenced, the planning authority will consult with the housing, social and health services on the appropriateness of proposals coming forward under this policy (and linked policies dealing with allocations for housing, the development of community facilities and applying standards for how housing is laid out) to ensure that the provision is meeting Pembrokeshire’s strategic needs for accessible housing, supported and specialist housing.</u></b></p>	FC5.GN22.03

## Appendix A

### WG 'Welsh Development Quality Requirements 2021' (WDQR 2021) (July 2021)

WDQR 2021 'Creating Beautiful Homes and Places' states "New affordable homes delivered ... under section 106 ... and planning conditions will only be required to meet the **Appendix A** and **Appendix B** 'space requirements' for agreements entered into after 01 October 2021."

**Appendix A** - Homes should be of sufficient size to meet the needs of occupants, have a convenient layout for everyday living and have adequate circulation space.

#### **Space requirements will be met where:**

- The dwelling provides at least the Gross Internal (floor) Area (GIA) and built-in storage area set out in Appendix B.
- Accessibility requirements will be satisfied if dwellings are designed to meet the Lifetime Homes Standards as published by the Joseph Rowntree Foundation.  
<http://www.lifetimehomes.org.uk/pages/revised-design-criteria.html>
- Homes are provided with adequate facilities for clothes washing, drying and a dedicated airing cupboard containing an appropriate source of heat.
- A dwelling with two or more bed spaces has at least one double (or twin) bedroom.
- Critical room dimensions meet intended purposes, in particular: -
  - A single bedroom must have a floor area of at least 6.5m<sup>2</sup> and must be at least 2.1m wide.
  - A double or twin bedroom must have a floor area of at least 11.5m<sup>2</sup>.
  - One double (or twin bedroom) must be at least 2.75m wide and every other double (or twin) bedroom must be at least 2.55m wide.
- The minimum floor to ceiling height is 2.3m for at least 75% of the GIA.
- Gross Internal (floor) Area (GIA) is measured to the internal finished surfaces of main containing walls on each floor, including private staircases, internal partitions, flues and ducts; it excludes external dustbin enclosures or stores, any porch open to the air or enclosed.
- The measurement of floor area of common access flats excludes the area of the communal stairs and circulation space.
- The measurement of floor areas of individual ground floor external access flats includes the area occupied by the staircase and entrance hall necessary to gain access to the first floor flat. The areas of the ground floor and upper floor flats (walk-up) shall be averaged in order to make comparisons against the minimum floor areas shown above.
- Space for mechanical and electrical installations should be provided in addition to the above general storage areas.
- The areas in the table are based on single or two storey homes and it is recognised that larger homes and homes over two storeys will have a proportionate increase in area.

#### **Appendix B - Minimum Floor Areas**

Home Designation	Home Type	Floor Area (GIA) m <sup>2</sup>	General Storage m <sup>2</sup> (included in GIA)
7P4B	2 Storey House	114	3
6P4B	2 Storey House	110	3
5P3B	2 Storey House	93	2.5
4P3B	2 Storey House	88	2.5
4P2B	2 Storey House	83	2.5
3P2B	2 Storey House	74	2
3P2B	Bungalow	58	2
3P2B	Flat - Walk up	65	2
3P2B	Flat - Common access	58	2
2P1B	Flat - Walk up	53	1.5
2P1B	Flat - Common access	50	1.5

**Note:** Provided that designs do not compromise the quality of homes intended to be delivered by this standard, a reduction of up to 5% of the above GIA may be applied.

<sup>11</sup> <https://www.torfaen.gov.uk/en/Related-Documents/Forward-Planning/SPG-Annex-1-Affordable-Housing.pdf>

## 4.10 Jeffreyston

Jeffreyston: Is the housing provision for Jeffreyston appropriate?	
LDP and Other Document References	i) Proposals Map Jeffreyston ii) SP 7 Settlement Boundaries iii) GN 13 Residential Development iv) GN 16 Residential Allocations (HSG/047/LDP2/1) v) Candidate Sites' Register (Jeffreyston) vi) Rural Facilities Report

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
<b>An amendment to Allocation HSG/047/LDP2/1 is required</b> with a consequential amendment to the Settlement Boundary. Consideration should have been given to extending the allocation site to secure the interests of sustainable development. The extension forms part of Candidate Site 524. An additional area of land is also included (New Site 29). A detailed submission is provided setting out locational considerations, planning framework, how the plan can be made sound and alternative site undeliverability. A site layout plan is also included showing 15 houses.	<b>4406 (Agent 4277)</b>  <b>34376/1/2/3</b>	<b>Mr I Evans (Agent JCR Planning Ltd).</b>  <b>Mr I Evans</b>
<b>Object to site allocation HSG/047/LDP2/1</b>	4350/1 1759/6 4447/1 4447/2 2242/1 2242/2	R Ariss Jeffreyston Community Council M Rogers (Neighbour petition) M Rogers (Neighbour petition) Mr and Mrs Rogers Mr and Mrs Rogers
<b>Development of site 524 would have a devastating impact on wildlife.</b> The hedgerow bordering the site is imperative for nesting birds and the marshy land within the site may be providing a habitat for protected species such as newts. Mature trees would require felling.	4286/1 <b>4443/1</b> 1759/2 1759/5 4447/1 4447/2 2242/1 2242/2 4345/1 4289/1	CA Ballantyne <b>J Williams</b> Jeffreyston Community Council Jeffreyston Community Council M Rogers (Neighbour petition) M Rogers (Neighbour petition) Mr and Mrs Rogers Mr and Mrs Rogers M Chiffi K and A Morgan
<b>Site 524 is subject to frequent flooding</b> from the stream during the winter.	1759/2	Jeffreyston Community Council
<b>Estate development is not in keeping with the character or scale of the local area.</b> The style of housing proposed for <b>Site 524</b> would alter the	4286/1 <b>4443/1</b> 1759/4 1759/2	CA Ballantyne <b>J Williams</b> Jeffreyston Community Council

[illegible]

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
		Mr and Mrs Rogers K and A Morgan
<b>A water supply can be provided.</b> HSG/047/LDP2/1 is crossed by a 100mm diameter watermain which runs parallel to the road.	2603/57 4286/1	Dwr Cymru/Welsh Water CA Ballantyne
There are <b>no public sewers</b> in Jeffreyston.	2603/57 4354/1 1759/2 1759/3 1759/7 2242/1 2242/2 4289/1	Dwr Cymru/Welsh Water J Cox Jeffreyston Community Council Jeffreyston Community Council Jeffreyston Community Council Jeffreyston Community Council Mr and Mrs Rogers Mr and Mrs Rogers K and A Morgan
<b>The village has limited infrastructure.</b> Development of Candidate Site <b>524</b> is not viable – the infrastructure required would make it very expensive to develop.	4354/1 1759/1 1759/2 2242/1 2242/2 4344/1	J Cox Jeffreyston Community Council Jeffreyston Community Council Mr and Mrs Rogers Mr and Mrs Rogers Mr Rogers
Concerned why <b>development is</b> being <b>divided</b> between 2 sites (Sites 524 and 375) as this will <b>affect the delivery of affordable housing.</b>	1759/1	Jeffreyston Community Council
<b>Concern about social impacts</b> of more housing on existing residents.	1792/2	Jeffreyston Community Council
There is a <b>lack of facilities</b> in the village – the nearest are 3 miles away in Kilgetty.	1759/2	Jeffreyston Community Council
Concern about the <b>impact on existing services</b> such as electricity supply, water supply and telecommunications.	1759/2	Jeffreyston Community Council
Concern about <b>increased noise and pollution</b> and the potential effect on elderly residents.	1759/5 4345/1 4281/1	Jeffreyston Community Council M Chiffi K and A Morgan
Development of site HSG/047/LDP2/01 would permanently destroy productive agricultural land.	4434/1	Mr Rogers
The <b>village already has land available for expansion</b> , it does not need more residents.	1759/2 4354/1 4447/1 4447/2 2242/1 2242/2 4345/1 4289/1 4344/1	Jeffreyston Community Council M Rogers (Neighbour petition) M Rogers (Neighbour petition) Mr and Mrs Rogers Mr and Mrs Rogers M Chiffi K and A Morgan Mr Rogers

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
<p><b>Site 375: Objection to inclusion of Site 375 within the Settlement Boundary.</b> Traffic would have to drive through the centre of the village to reach the site.</p> <p>Concern about noise during construction and once the site is occupied.</p> <p>Infrastructure is inadequate to cater for additional houses.</p> <p>Additional traffic would have a detrimental impact on safety for pedestrians and cyclists.</p> <p>The bus service is very limited.</p> <p>There is a lack of amenities.</p> <p><b>Candidate Site 524</b> is a more appropriate location for development, subject to it being a suitable scale for the village.</p>	<p>1759/5 1759/1 1759/6 4424/1</p>	<p>Jeffreyston Community Council Jeffreyston Community Council Jeffreyston Community Council V John</p>

Response
<ol style="list-style-type: none"> <li><b>Overview</b> – two Candidate Sites were submitted for consideration at Jeffreyston. Candidate Site 375 occupies land allocated for residential development in LDP1, but which has not come forward for development. A portion of Candidate Site 375 has been included within the Settlement Boundary for LDP2 but not allocated. Candidate Site 524 was considered appropriate for housing and part of the site was allocated for 8 dwellings under HSG/047/LDP2/2 South of the Crown. The remaining area was excluded from the Settlement Boundary as it was not required for housing during the Plan period.</li> <li>A small area of land (New site 19) is also included as part of the site submission for Candidate Site 524.</li> <li>The site allocated in the Plan (<b>HSG/047/LDP2/1 South of the Crown</b>) is part of a larger Candidate Site (<b>ref. 524</b>) submitted for consideration. This site is situated to the south-west of the village. The area included within the settlement boundary and allocated for residential development measures approximately 0.42ha to accommodate a minimum of 8 houses. Based on the densities for residential sites set out in Policy 13 (Residential Development) of the Plan, the site could accommodate 9 or 10 dwellings. It was estimated that the development would be delivered in the long-term (2028-2033). The representor supports the land allocation in the plan and the suggested timing for delivery.</li> <li>Part of a second Candidate Site (<b>ref. 375</b>) has been included within the Settlement Boundary but not allocated for development. This site is located at the northern edge of the village. This site measures approximately 0.27ha and using the standard density set out in Policy 13 (Residential Development) could accommodate 6 dwellings. The site is part of a wider allocation for residential development in the current Local Development (Adopted 2013) but has not come forward for delivery to date. It is considered that these two sites will deliver an appropriate number of new dwellings within the relatively small village of Jeffreyston to meet identified growth during the Plan period (See Policy SP 9 Service Centres and Service Villages).</li> </ol>



## Response

5. The remainder of both Candidate Sites were considered to be suitable (category Amber 4) for development but excluded from the settlement boundary as sufficient land has been allocated in the Plan or is committed to accommodate the identified level of growth. This doesn't preclude either or both being re-assessed for development beyond the current Plan period.
6. The site submitted by the landowner of Candidate Site 524 through the Deposit Plan consultation includes much of the entire area of Candidate Site 524 and an additional area of land to the west of the site. A site plan for the whole site has been submitted showing a layout for 15 dwellings. The key benefits for increasing the size of allocation HSG/047/LDP2/1 South of The Crown as set out in representation 4406 are:
  - a) The land allocated in LDP1 (Sunnyside) for residential development and partly retained as white land within the Settlement Boundary for LDP2 (Candidate Site 375) has not come forward for development.
  - b) The Sunnyside site (Candidate Site 375) has poor access and significant tree cover.
  - c) Deliverability of Candidate Site 524 would be greatly improved;
  - d) Site HSG/047/LDP2/1 is situated closer to the school;
  - e) Increasing the size of the allocation will allow on-site provision of affordable housing rather than the off-site contribution detailed in the Plan.
  - f) The hedgerow along the site frontage can be retained and a footway created behind;
  - g) The footpath can be linked to the path at the southern end of the road to improve pedestrian links to the school;
  - h) Prominent trees can be afforded protection, although two in the site frontage have ash die-back;
  - i) A solar array can be provided on land to the south, within the landowner's ownership to reduce the carbon footprint of the development.
7. There are a number of representations objecting to the allocation of Site HSG/047/LDP2/1 South of The Crown. The main issues are set out above in the Summary of Issues table.
8. The site was assessed and comments received from a number of statutory and other agencies which can be used in response to some of the issues raised by the local community:
  - a) The site is not in flood risk zone.
  - b) Dwr Cymru/Welsh Water has clarified that there is no public sewer in the village. Development of the site will therefore need to include private drainage facilities.
  - c) The Coal Authority has confirmed that there is a coal mine shaft to the north-west corner of the site which has been designated as open space in the Deposit Plan. There is also a possibility of unrecorded shallow coal workings throughout the site.
  - d) The hedgerow and mature trees along the eastern site boundary and the mature tree in the centre of the site should be retained if possible.
  - e) Natural Resources Wales has been consulted about the site and identified a need to assess the potential for the site to support protected species – namely hazel dormouse, bats and water voles. The Council's Ecologist requested that trees should be retained, and that the habitats of protected species are retained and substantially buffered. The adjacent woodland is likely to be used by bats and this will require further assessment. An ecological report will be required in order to inform the layout of development within the site and a buffer retained around the woodland in the north-west corner of the site.
  - f) The Highway Authority has required the site access onto the B4586 and a shared user path to connect to the existing footpath 80m to the south-east. No concerns were raised about the capacity or nature of the local road network to accommodate traffic movements arising from the site allocation.

## Response

- g) The majority of the agricultural land surrounding the village is Grade 3a land. Lower graded land further away from the village and poorly-related to it. It also contains pockets of woodlands and a stream valley.

### 9. In response to the other matters raised by the community:

- a) **Limited infrastructure** – the lack of a public sewer has been identified. Private sewers will be required with appropriate safeguarding against pollution. This can be achieved. Neither Natural Resources Wales nor Dwr Cymru/Welsh Water has raised an objection to this. Dwr Cymru has advised that a water supply can be provided for the site. Easements will be required along the site frontage due to the location of the water main. Electricity companies are a statutory consultee in the planning process. No responses have been received with regard to the electricity supply at Jeffreyston. Broadband is available in the village.
- b) **Facilities** - Whilst not all facilities are available within the village, it has sufficient to be categorised as a Service Village, with a weighted score of 20 points in the Rural Facilities Report.
- c) **Disruption, noise and social impacts** – the construction of the site will inevitably create some noise and disruption, but this can be minimised by use of appropriate conditions to control the time of work and maintaining good site management. The use of the site for residential use is compatible with the neighbouring residential uses.
- d) **School capacity** – the school has capacity for 120 children and in 2024 had 97.5% occupancy. Responsibility for admissions rests with the School's Governing Body, but currently less than 40% of the pupils attending the school reside within the school catchment. The Education Authority advises that it can be anticipated that the School's oversubscription policy will be applied as children yield from the local area, thereby enabling the school to take in more children from the local area and fewer from outside the catchment.
- e) **Affordable Housing Delivery** – Policy GN 16 (Residential Allocations) of the Deposit Plan sets out the anticipated affordable housing delivery for each of the residential allocations taking viability into account. The requirement for Site HSG/047/LDP2/1 is for an off-site contribution. Policy GN 20 (Local Needs Affordable Housing) of the Deposit Plan sets out the requirement for affordable housing on non-allocated sites and provides an indication of affordable housing delivery for the proposed enlarged site allocation. Jeffreyston is a Band 2 Settlement. The table in Policy GN20 indicates that on-site provision of affordable housing would require a development at 50+ units. Below this number, an off-site contribution would be required.
- f) Planning permission to develop Site 375 would be considered within the context of LDP1 requirements (18 dwellings including 4 affordable houses (25%)) until the adoption of LDP2. The reduced site size and non-allocation of the land would result in a financial contribution towards off-site provision being made, as set out by Policy GN20 of the Plan.

10. **Candidate Site 375** - There are also objections to the inclusion of land at Sunnyside within the Settlement Boundary. An overview of the concerns is included above in the Summary of Issues table. This site is not allocated for development in the Deposit Plan. The Settlement Boundary for Jeffreyston in this location has been drawn to include the parcel of land bounded on two sides by residential development and a third side by the village road. The north-east boundary is formed by the Settlement Boundary that is marked by the field boundary on the ground. Whilst it has the characteristics of an infill site, the white land included in the boundary measures approximately 0.27ha and could accommodate 6 dwellings based on the standard density for Service Villages, as set out in Policy GN13 of the Deposit Plan. The reason for the land being deallocated is non-delivery. Planning permission

## Response

to develop the site has not been sought since 2006 when outline permission was granted and lapsed in September 2010.

11. In response to other issues raised for this site (Candidate Site 375):

- a) The Highway Authority has not raised concerns about the general road network. The land included in the Settlement Boundary was part of a much larger area of land allocated for 18 houses.
- b) As white land, no particular use is specified. Planning applications to use or develop the land will need to take into consideration the neighbouring residential uses to ensure that the amenity and privacy of residents is taken into account.
- c) The village has sufficient amenities to be categorised as a Service Village, including a primary school, pub and community hall. The Rural Facilities Report shows that the village has a weighted score of 20.
- d) The village is in the South Pembrokeshire Fflecsi Bus zone. Trips are booked in advance, and the route is determined by the requirements of the passengers. The buses are available from 07.30 until 18.30 Monday to Saturday.

12. **Candidate Site 375** – The site has not come forward for development to date and this is the main reason for its de-allocation change of the Settlement Boundary. The settlement boundary retains an area of undeveloped land (white land) which could be developed for housing, in which case it would be classed as a windfall development. Taking it out of the Settlement Boundary would not prevent it being developed for a range of uses, including 100% affordable housing, business or community uses.

13. **Site: HSG/047/LDP2/1; Candidate Site 524** – Candidate Site 524 was considered by the Council to be appropriate for residential development in the context of professional advice from statutory undertakers and specialists. The landowner supports the inclusion of this site in the Plan and allocation for residential development. A larger allocation is requested to improve delivery of the site. An indicative layout has been submitted, showing 15 houses, although this is likely to require amendment to take into account ecological constraints, particularly around the woodland to the north-west and the presence of the water main along the site frontage with the road. Taking these matters into account it is likely that the number of dwellings on the site would need to be reduced.

14. A larger site with a greater number of houses would increase the off-site financial contribution to affordable housing provision, but it would not necessarily achieve delivery of on-site affordable homes based on the policy requirements of the Deposit Plan. The landowner has indicated a desire to get planning permission for the site at the earliest opportunity.

## Conclusions:

15. Retain part of Candidate Site 315 within the Settlement Boundary, as shown in the Deposit Plan.
16. Extend the area of Site Allocation HSG/047/LDP2/1 as suggested by Representations 4406 (1,2,3,4) and 34376 (1,2,3) to improve the viability of the site and therefore increase chances of deliverability. The number of units shown in Policy GN 16 (Residential Allocations) of the Plan is a minimum number. Limiting the increased number of units from 8 (as allocated in the Deposit Plan) to 10, rather than 15 requested by the representor will allow for the ecological and water main constraints detailed above. The land shown as open space, immediately to the north-west of the site to be retained as such. The allocation would not include the open space.

**Response**

17. The inclusion of New Site 19 within the site is incidental. The western boundary of the site does not follow a physical feature on the ground and a small triangular area of land could be added to the allocation site.

**Recommendations****Focussed Change/Edit Ref**

A.	Amend the Proposals Map to show the amended area of Residential Allocation HSG/047/LDP2/1 as set out in representations 4406/4 and 34376/2. Amend the Proposals Map to include the proposed site within the Settlement Boundary for Jeffreyeston.	FC5.GN16.Jeffreyeston.01 FC4.SP07.Jeffreyeston.02
B.	Amend Policy 16 (Residential Allocations) of the Plan to show the updated size of Residential Allocation HSG/047/LDP2/1, amended number of units from 8 to 10 and amend the site area to 0.79ha.	FC5.GN16.Jeffreyeston.02
C.	Update the Housing Trajectory to take account of the changes to the number of units and timescale for delivery of the site.	FC6.App2.Jeffreyeston.01
D.	Update the Candidate Sites Register for Jeffreyeston to reflect the inclusion of additional land from Candidate Site 524 plus new site 19 in the allocation and within the settlement boundary.	OE18 Candidate Site Register

## 4.11 Lamphey

Lamphey Are the sites chosen for development in the village appropriate for development? Should additional land be included?	
LDP and Other Document References	<ul style="list-style-type: none"> <li>• SP 7 Settlement Boundaries</li> <li>• GN 13 Residential Development</li> <li>• GN 15 Housing Mix, Second Homes and Short-term Holiday Lets, Space Standards and Requirements for Lifetimes Homes Standards</li> <li>• GN 16 Residential Allocations</li> <li>• Local Development Plan Deposit 2 – Appendix 2 Housing Components and Trajectory, Table 2.</li> <li>• Sustainability Appraisal Scoping Report, October 2018.</li> <li>• SA Appendix 6: Allocations</li> <li>• Development Sites and Infrastructure Supplementary Planning Guidance</li> <li>• Affordable Housing Supplementary Planning, September 2015.</li> <li>• Article 10 (1) (e) of the GPDO 1995 and WO Circular 29/95 – General Development Order Consolidation 1995 (May 1995)</li> </ul>

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
The current application (23/0576/PA) for HSG/052/00011 (South of Cleggars Park) proposes a number of units in excess of the 55 houses.	1553/1	Lamphey Community Council.
Concerns raised regarding surface water drainage and flood risk at HSG/052/00011(South of Cleggars Park).	1553/1 1553/2	Lamphey Community Council.
<b>Foul water/sewage capacity –</b> HSG/052/00011 (South of Cleggars Park) is crossed by a 150 mm diameter sewer. HSG/052/LDP2/1 (Adjacent Lamphey School) is crossed by a 6" diameter waste main.  Concern regarding the capacity of existing foul water infrastructure to accommodate the new development are raised.	2603/44 2603/45  1553/3	Dwr Cymru/Welsh Water.  Lamphey Community Council.
Development at HSG/052/LDP2/1 (Adjacent to Lamphey School) suggested to take up to 5 years to be completed. This should be revised to minimise disruption.	1553/5	Lamphey Community Council.
There are significant highways and safety concerns that need to be addressed, specifically regarding	1553/4	Lamphey Community Council.

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
school holiday period, school opening and closing times, periods of intense agricultural activity. A developer should engage a competent highways engineer to conduct traffic surveys during times on increased traffic flows.		
The density of houses proposed at HSG/052/00011 (South of Cleggars Park) should be lowered as the site is overdeveloped.	1553/5	Lamphey Community Council
The development should reflect the mix of housing styles and surrounding natural habitat.	1553/5	Lamphey Community Council
<b>The development may impact on the use of level crossings</b> – includes both HSG/052/LDP2/1 (Adjacent Lamphey School) and HSG/052/00011 (South of Cleggars Park). Network rail has advised mitigation measures should be delivered where there is an adverse impact on the operation of the railway. Developers should be specific.	1545/3 1545/4	Network Rail
Lamphey Settlement Boundary should be amended to include land adjacent to the Sidings, Lower Lamphey Road, as it is currently drawn in a way which subdivides the field, following no natural or physical features. This amenity space is within the current (LDP1) Settlement Limits and received a positive pre-application response for development at this location. <b>LDP2/Deposit2/New Site 28.</b>	4374/1	Mr & Mrs M Thomas
Development at HSG/052/LDP2/1 (Adjacent Lamphey School) would have a detrimental impact on the special qualities of the National Park. Development at HSG/052/LDP2/1 (Adjacent Lamphey School) has raised concerns regarding the landscape impacts and a potential conflict with Objective 19 of the Sustainability Appraisal.	34485/28 34485/40	Pembrokeshire Coast National Park Authority
Adjoining Pembrokeshire hedge banks and hedges that make up some of the boundaries of the site should be afforded proper protection.	1553/6	Lamphey Community Council
Any residential development in Lamphey should be built for local needs. A covenant should ensure housing is for local needs and not for second homes/holiday lets.	1553/5	Lamphey Community Council
Conditions should be attached to any planning permission to enable enforcement on antisocial behaviour.	1553/5	Lamphey Community Council
Conditions should be attached to planning permissions to ensure that the foul and surface water maintenance are taken over by the appropriate authorities & the developer must take the necessary steps to ensure that the local authority adopts the road.	1553/2 1553/4	Lamphey Community Council Lamphey Community Council



## Response

1. This paper addresses a mixture of representations for Local Development Plan Deposit 2 and comments on a current planning application being considered by the Council under Local Development Plan 1. The response will address the issues raised where implications may affect the allocation of sites identified in Local Development Plan Deposit 2. It will not address concerns raised in relation to the planning application yet to be determined.
2. **HSG/052/00011 South of Cleggars Park. An application has come forward proposing a greater number of units than allocated.** Local Development Plan 2 stipulates a minimum number of units anticipated in the plan period to ensure best use of land, whilst taking into account site constraints. This would not prejudice a subsequent planning application being submitted for a higher number of units which, subject to Plan policy provisions, can be accommodated.
3. **HSG/052/00011 South of Cleggars Park & HSG/052/LDP2/1 Adjacent to Lamphey School - Issues regarding surface water flooding** will be considered at planning application stage. Sustainable drainage systems (SuDS) for the site will require a Sustainable Drainage Advisory Body application to be submitted to the Local Authority to ensure that surface water is managed sustainably.
4. **HSG/052/00011 South of Cleggars Park & HSG/052/LDP2/1 Adjacent to Lamphey School - Issues regarding foul water drainage.** Both sites have been assessed and comments received from a number of statutory consultees including Dwr Cymru/Welsh Water (DCWW). DCWW has confirmed that the public sewerage network can accept the potential foul flows from the proposed development at both HSG/052/00011 (South of Cleggars Park) and HSG/052/LDP2/1 (Adjacent Lamphey School).
5. **HSG/0052/LDP2/1 (Adjacent Lamphey School) – Development Timing and Phasing.** As indicated in Appendix 2: Housing Components and Trajectory, Table B: Anticipated Timing and Phasing of Allocated Sites, the development across the two candidate sites in Lamphey is proposed to occur over a 9-year period. This proposed phased approach is considered appropriate. However, this is an anticipated timeline, and development could come forward using a different timescale. The disruption caused by construction on site can be minimised by the use of appropriate conditions to control the time of work and maintaining good site management, such as through a Construction Environment Management Plan.
6. **HSG/052/00011 South of Cleggars Park & HSG/052/LDP2/1 Adjacent to Lamphey School.** The allocated sites have been reviewed by the Highway Authority. The Highway Authority advises that there are constraints on the sites, but the effect of these can be mitigated.
  - a) **HSG/052/LDP2/1 Adjacent to Lamphey School:** The Highway Authority requires that access will be provided onto the A4139, achieved at an appropriate standard. It is recommended by the Highway Authority that the existing 20mph speed limit within Lamphey is extended to the east of the access point of the site. A footpath with crossing points should be provided to the front of the site. The Highway Authority has determined that site constraints can be mitigated and has made recommendations to ensure safety. The details of this can be considered at detailed planning application stage.
  - b) **HSG/052/00011 South of Cleggars Park:** The Highway Authority requires the existing access road off Freshwater East Road to be brought up to adoptable standards. The developer should consider active travel links to Cleggars Park and Honeyhill Grove.



7. **HSG/052/LDP2/1 Adjacent to Lamphey School and HSG/052/00011 South of Cleggars Park - Density proposed for sites.** Local Development Plan 2 Deposit 2 Policy GN.13 Residential Development sets out minimum site densities for gross site areas. For a Service Centre, this is 23 dwellings per hectare and, as discussed in Point 1 above, the Local Development Plan stipulates the *minimum* number of units anticipated in the plan. For HSG/052/LDP2/1 (Adjacent to Lamphey School), the density proposed is approximately 22.86 units per hectare. For HSG/052/00011 (South of Cleggars Park) the density proposed is approximately 22.63 units per hectare. There are no unique features at either site to justify a change in the proposed density.
8. **HSG/052/LDP2/1 Adjacent to Lamphey School and HSG/052/00011 South of Cleggars Park.** The details regarding proposed design of dwellings will be addressed at a detailed planning application stage. Pembrokeshire County Council's Landscape Officer has been consulted and provided comments for both sites. The proximity of both sites to the National Park would require a comprehensive landscape scheme to be provided at application stage.
9. **The impact on development on the level crossing.** The north-eastern corner of Candidate Site HSG/052/00011 (South of Cleggars Park) is located over 350 metres southwest of the level crossing. Pedestrians leaving the site will most likely exit on Freshwater Road and follow the pavement north over the railway bridge to access community facilities that are north of the railway. Existing pedestrian routes are more likely to be utilised by occupiers of residential properties at HSG/052/00011 rather than the level crossing. Candidate Site HSG/052/LDP2/1 (Adjacent Lamphey School) is however located in close-proximity to the level crossing, and it is likely that pedestrians could use the level crossing to travel north of the railway. A residential development at this location is likely to result in a material increase in the volume or a material change in the character of traffic using the level crossing. Therefore, Network Rail would be a Statutory Consultee on a planning application by reason of Article 10 (1) (e) of the GPDO 1995 and WO Circular 29/95 – General Development Order Consolidation 1995 (May 1995). The recommendation of providing a Transport Statement to support a planning application can be included within the **Development Sites and Infrastructure Supplementary Planning Guidance**.
10. **Query regarding the settlement boundary.** Whilst informal pre-application advice has been provided for the land adjacent to the Sidings, Lower Lamphey Road, no planning application has been made to develop the land. The Housing Requirement Background Paper outlines the level of growth required and the details of delivery. If an amendment to the Settlement Boundary at Lamphey were to be made as suggested, the site could accommodate approximately 10 dwellings and therefore would accommodate a level of development which would require the site to be allocated. This site was not submitted for consideration as a Candidate Site. Four sites were submitted (015, 132, 197 & 200). Two assessed Candidate Sites (132 & 200) have been allocated for a total of 95 units which is considered sufficient for the Plan period. The portion of the land (0.24ha) included within the settlement boundary could accommodate 5 or more dwellings (under Policy GN.13 Residential Allocations) and could come forward as a windfall site during the Plan period.
11. **HSG/052/LDP2/1 Adjacent Lamphey School. Impact of development on the special qualities of the National Park.** Candidate Site 132 is adjacent to the National Park on both the eastern and southern boundary. However, Candidate Site 132 has only been part allocated and therefore there is still a field buffer between the proposed development site and the National Park. Additionally, a landscaping scheme will be required to protect the special qualities of the National Park which will mitigate the potential impacts of any development. The importance of an appropriate landscaping scheme can be included within the **Development Sites and Supplementary Planning Guidance**. An appropriate and sufficient

landscaping scheme submitted at planning application stage will protect and enhance the landscape and therefore accord with Objective 19 of the Sustainability Appraisal.

12. **HSG/052/LDP2/1 Adjacent to Lamphey School and HSG/052/00011 South of Cleggars Park - Protection of existing landscape features.** PCC's Landscape Officer has been consulted for both the allocated sites. As discussed above, a landscape scheme will be included within the **Development Sites and Supplementary Planning Guidance**. An appropriate and sufficient landscaping scheme submitted at planning application stage will protect existing features and enhance the landscape.
13. **HSG/052/LDP2/1 Adjacent to Lamphey School and HSG/052/00011 South of Cleggars Park - Affordable housing for local people.** Pembrokeshire County Council's current Affordable Housing Supplementary Planning Guidance provides guidance on who can occupy affordable homes (this is subject to review but likely to contain similar requirements). Paragraphs 4.7 to 4.9 under Section 4 'How area affordable housing policies implemented?' states that social landlords operate a local connection policy where households who meet the local connection criteria will be given preference on first lettings.
14. **HSG/052/LDP2/1 (Adjacent to Lamphey School) and HSG/052/00011 (South of Cleggars Park) - Issues of homes being used for holiday lets and second homes.** The inclusion of an occupancy condition to restrict use to a primary residence can be considered at planning application stage if there is evidence of particular issues concerning second homes and holiday homes. Policy GN.15 Housing Mix, Second Homes and Short-term Holiday Lets, Space Standards and requirements for Lifetime Home Standards provides a policy framework to appropriately address this.
15. Planning conditions cannot be used at residential development sites to control antisocial behaviour. This would be a matter for the landlord and/or police.
16. **The adoption and maintenance of associated infrastructure.** At planning application stage, the relevant authorities ( e.g. Natural Resources Wales and Dwr Cymru) will be consulted on applications. They will issue the appropriate advice regarding foul and surface water and the maintenance of these systems. The issue regarding the adoption of the highway will be discussed at planning application stage and through consultation with PCC's Highway department at this stage. The highway would need to be constructed to appropriate standards to be adopted and the adoption of the highway would likely be subject to a **S278/S38 Agreement** with PCC's Highway Department.

Recommendations		Focussed Change/Edit Ref
A.	Ensure the Development Sites and Infrastructure Supplementary Planning Guidance makes reference to the recommendation for a Transport Statement to be submitted alongside a planning application at Candidate Site HSG/052/LDP2/1 as necessitated by Network Rails response regarding the level crossing.	N/A.
B.	Ensure Development Sites and Infrastructure Supplementary Planning Guidance makes reference to an appropriate Landscaping Scheme to be included with any planning application due to proximity to Pembrokeshire Coast National Park boundary.	N/A

## 4.12 Llanteg Llanteglos

<b>Llanteg and Llanteglos: Are these locations correctly identified as Service Villages?</b>	
<b>LDP and Other Document References</b>	i) Proposals Map Llanteg and Llanteglos ii) SP 6 Settlement Hierarchy - Service Village iii) SP 7 Settlement Boundaries iv) GN 13 Residential Development v) Rural Facilities Background Paper vi) Candidate Sites' Register

<b>Summary of Issues</b>	<b>Raised By</b>	<b>Name (wish to speak at Examination in bold)</b>
Inaccurate Data – public house and church have both closed and the village green is not maintained/used.	<b>4305/1</b> <b>4305/10</b> <b>4306/1</b> 4379/2 4380/1 34751/1 & 2	<b>Mr and Mrs Taylor</b> <b>Mr and Mrs Taylor</b> <b>Mr and Mrs Hiscock</b> T Cormack Cllr A Cormack Amroth Community Council
There is no public transport in the vicinity.	<b>4305/1</b> <b>4305/2</b> <b>4305/6</b> <b>4306/1</b> <b>4306/2</b> <b>4305/9</b>	<b>Mr and Mrs Taylor</b> <b>Mr and Mrs Taylor</b> <b>Mr and Mrs Taylor</b> <b>Mr and Mrs Hiscock</b> <b>Mr and Mrs Hiscock</b> <b>Mr and Mrs Taylor</b>
Inconsistent grouping of settlements - Llanteg, Llanteglos and Llanteg Park have been treated differently. All should be considered separately as in other places such as Wiseman's Bridge and Pleasant Valley.	<b>4305/2</b> <b>4306/2</b>	<b>Mr and Mrs Taylor</b> <b>Mr and Mrs Hiscock</b>
Candidate Sites 220, 428 and 434 should not be supported.	<b>4305/1</b> <b>4306/7</b> <b>4306/9</b> <b>4306/1</b>	<b>Mr and Mrs Taylor</b> <b>Mr and Mrs Taylor</b> <b>Mr and Mrs Taylor</b> <b>Mr and Mrs Hiscock</b>
Development of Candidate Sites 220 and 434 would not comply with the National Planning Policy Framework to prioritise sustainable development and protect environmental assets.	<b>4305/8</b>	<b>Mr and Mrs Taylor</b>
Other reasons that Candidate Sites 428, 434 and 220 should not be supported include: a. Ground source Protection Zone adjacent to site 220.	<b>4305/3</b> <b>4305/4</b> <b>4305/5</b> <b>4306/3</b> 4380/4	<b>Mr and Mrs Taylor</b> <b>Mr and Mrs Taylor</b> <b>Mr and Mrs Taylor</b> <b>Mr and Mrs Hiscock</b> Cllr A Cormack

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)														
b. Site regularly floods due to run-off from higher ground and poor drainage. c. Site is rich in biodiversity – adders, amphibians, birds and bats. d. Would affect the ‘green belt’ between the village and the National Park. e. No mains drainage f. Access via single-track roads is problematic g. Development is too large for the village.	34751/5	Amroth Community Council														
Include parcel of land known as Hafod Wen in the settlement boundary. <b>New Site proposed at Deposit Stage.</b>	34425/1	Messrs K and J Worthing et al														
Include Candidate Site 135 into the settlement boundary of Llanteg.	34629/1 34629/2 34629/3	Mr P Griffiths (BABB Architects) Mr P Griffiths (BABB Architects) Mr P Griffiths (BABB Architects)														
Lack of proper consultation and documentation is flawed.	<b>4305/10</b>	<b>Mr and Mrs Taylor</b>														
<b>Response</b>																
<p>40. <b>Service Village Designation:</b> For the purposes of the Plan, Llanteg and Llanteglos are grouped together as a single settlement. In combination, the two built areas are defined as ‘Service Villages’ under Policy SP6 (Settlement Hierarchy) of the Plan. This categorisation is tier 3 of 4 in the settlement hierarchy. The amount of growth directed to each level of settlement depends on the hierarchy placing – which in turn, is based on the assessment of available services and facilities.</p> <p>41. A rural facilities survey was undertaken by the Council in 2017 – the base year for LDP2, updated in 2018 and 2019, following publication of the Preferred Strategy for LDP2. A further update was undertaken in autumn 2020, following the initial Covid-19 lockdown which had a significant impact on behaviours and consequently services and facilities. A final update to the data was made in July 2024.</p> <p>42. In the survey the combined villages of Llanteg and Llanteglos were found to have a range of services, giving a weighted score of 12 points. Service Villages were selected on the basis of having ‘<i>an excellent service provision, scoring 11 or more points</i>’. The table below shows the facilities and weighted scoring.</p> <table><tr><td>Population</td><td>Local Store</td><td>Community Hall</td><td>Public House</td><td>Place of Worship</td><td>Village Green</td><td>Total 12 points</td></tr><tr><td>129</td><td>(5 points)</td><td>(3 points)</td><td>(2 points)</td><td>(1 point)</td><td>(1 point)</td><td></td></tr></table> <p>43. The representations submitted following the Deposit Plan consultation state that the public house closed in 2021, and the church closed in 2011. The availability of a village green is disputed.</p>			Population	Local Store	Community Hall	Public House	Place of Worship	Village Green	Total 12 points	129	(5 points)	(3 points)	(2 points)	(1 point)	(1 point)	
Population	Local Store	Community Hall	Public House	Place of Worship	Village Green	Total 12 points										
129	(5 points)	(3 points)	(2 points)	(1 point)	(1 point)											

Summary of Issues			Raised By	Name (wish to speak at Examination in bold)		
<p>44. It is reported on the Coflein website that the church closed in 2011 due to cracks in the tower which have caused it to be a dangerous structure. The public house remains closed. The village green is the former school garden, located between the villages of Llanteg and Llanteglos. It is situated in the countryside and poorly related to Llanteg and Llanteglos. It's countryside location would provide sufficient protection from development without the need for the open space designation. The loss of the public house, church and village green would reduce the score of the combined villages to 8. The rural facilities services report filed in the evidence base, defines those settlement with 3 to 10 points as 'Local Villages'. <b>Therefore, as a first step these villages should be reclassified as 'Local Villages' as a result.</b></p>						
Population	Local Store	Community Hall	Public House	Place of Worship	Village Green	Total 12 <u>8</u> points
129	(5 points)	(3 points)	<del>(2 points)</del>	<del>(1 point)</del>	<del>(1 point)</del>	
<p>45. The Rural Facilities Report 2024 does not specify distances within which services and facilities are to be located, apart from the National Cycle Network. In this instance the services currently still available are located closer to Llanteg than Llanteglos. Llanteg is a small, nucleated village. Access to the community hall and shop is reached by walking through the village and south to the A477. There are pavements available for all or the majority of the route. The shop is situated close to the village, along the same route to the A477, although there is a need to cross the carriageway which has a 40mph speed restriction.</p>						
<p>46. The distance from the land included within Llanteglos settlement boundary to Llanteg community hall is approximately 800m, with much of this distance along single-track roads running from the village to the A477 with no pavement. The national speed limit would apply to these roads. The distance from the same location to the shop at the filling station on the A477 is 820m. Again, this is mostly along single-track roads between the village and the A477 with no pavement. There is no street lighting along these routes. Whilst Llanteglos is reasonably proximate to the community hall and shop, its degree of accessibility is significantly limited. The route to the former school garden amenity space is also along the same single-track roads with no pavement.</p>						
<p>47. There are less facilities and services available than identified in the Rural Facilities Report which was used as evidence to support the settlement hierarchy of the Plan. <b>Those facilities and services that remain available would in the first instance reclassify Llanteg as a 'Local Village'.</b> Settlement boundaries are used for Local Villages to provide clarity on where opportunities for infill and rounding-off (typically 1 to 2 plots) may be suitable. <b>Llanteglos would not qualify as a Local Village as the limited-service provision available for Llanteg is not easily accessible in Llanteglos.</b></p>						
<p>48. In addition, Llanteglos does not have a bus route or active travel route option to a higher order settlement (as specified as a requirement in the Defining Settlement Clusters Report, May 2019) which would allow it to qualify as Cluster Village. <b>It is therefore also proposed that the settlement boundary be deleted from Llanteglos.</b></p>						

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
<p>49. The consultation process has been undertaken in accordance with the LDP Regulations. The recent Deposit consultation is a part of that process and offers further opportunity to address issues raised.</p> <p><b>50. Candidate Sites Llanteglos:</b> As advised above, no land allocations have been made in Llanteglos, but land has been included in the settlement boundary measuring approximately 0.46ha (a portion of Candidate Site 220). Existing properties in Llanteglos are all large and generally set in large plots. A further 3 to 4 properties could be provided in a similar style within the white land, however policy GN 13 Residential Development of the Deposit Plan requires new development in Service Villages and otherwise on sites of 0.10ha to be built at a density of at least 23 dwellings per hectare. On this site, it could amount to a minimum of 10 new dwellings. This number of dwellings would normally be subject to an allocation. <b>It is proposed that the area of site 220 which is included in the Deposit Local Development Plan settlement boundary be reclassified as unsuitable for development given the proposed re-categorisation of Llanteglos in the settlement hierarchy.</b></p> <p>51. Candidate Site 428 and part of 220 outside the settlement boundary have been assessed as sites suitable for development, but surplus to requirement within the Plan period (Category Amber 4) – see Candidate Sites’ Register and Site Assessment (September 2024). <b>Given the reclassification of Llanteglos Candidate site 434 has should be re-assessed as being unsuitable for residential development (Category Red 4).</b></p> <p>52. <b>Candidate Sites Llanteg:</b> Part of Candidate Site 135 was considered suitable for inclusion within Llanteg Settlement Boundary but due to highway and landscape concerns the majority of the site was excluded from the Boundary and categorised as unsuitable for residential development (Category Red 4).</p> <p>53. A small area of Candidate Site (ref. 135) has been included in the Settlement Boundary for Llanteg. The representor has suggested two options for including additional/all of the land contained within Candidate Site 135.</p> <p>54. The first of these is to include land to the west of the boundary currently occupied by an agricultural barn, which is no longer in use for agricultural purposes (<b>Option A</b>). The additional area is approximately 0.04ha. The second option is to include a large area of land extending from the northern boundary of Llanteg, including the barn and additional land to the west (Option B). This area measures approximately 0.61ha. Candidate Site 135 – <b>Option A – the agricultural barn is no longer in use. Inclusion of the area occupied by the barn within the Settlement Boundary for Llanteg would allow a small rounding off of the land for residential use, as proposed in Representation 34629/2.</b> The Highway Authority has advised that the existing access from the south would be sufficient to access up to 3 dwellings only.</p> <p>55. Candidate Site 135 – <b>Option B</b> – the site is on land rising from the northern Settlement Boundary of Llanteg to a field boundary to the north. Based on the minimum density required for residential sites in rural areas, it could accommodate at least 10 additional dwellings. This wider site breaches an established boundary of trees and hedgerow along much of the existing Settlement Boundary line and would extend development into the countryside beyond. Whilst the village of Llanteg is currently screened from the north by topography and hedgebanks, extension of the village to occupy the land north of the</p>		



Summary of Issues		Raised By	Name (wish to speak at Examination in bold)
<p>existing Settlement Boundary would have a considerable visual impact. Objections have also been raised by the Highways Authority in accommodating additional traffic in this location.</p> <p>56. Representor 34425 has requested inclusion of a parcel of land situated to the south-east of Llanteglos within the settlement boundary. The land is isolated from the settlement boundary shown in the Deposit Plan. The land submitted for inclusion within the Llanteglos settlement boundary is separated from the boundary shown in the Deposit Plan by undeveloped countryside. The land was not submitted as a Candidate Site, but the principle of its development for residential use would not be acceptable as it is located in the countryside. Access to the facilities at Llanteg would be subject to the same issues as those outlined above for Llanteglos.</p> <p>57. The additional reasons provided by the representors for rejecting Candidate Sites 428, 220 and 434 are detailed matters that will require further consideration only if the principle of their suitability for development is supported.</p>			
Recommendations		Focussed Change/Edit Ref	
A.	The Rural Facilities Background Paper March 2025 be updated in relation to the closure of the public house and church, as set out above.	See Other Edit OE9	
B.	Amend the Proposals Map to remove the Open Space designation on the land identified as a village green.	FC5.GN52.Llantegetc.01	
C.	Amend Policy SP6 (Settlement Hierarchy – A Sustainable Settlement Strategy) to delete the reference of Llanteg/LLanteglos as a Service Village. Amend Policy SP6 (Settlement Hierarchy – A Sustainable Settlement Strategy) to include Llanteg as a Local Village.	FC4.SP06.Llantegetc.01 FC4.SP06.Llantegetc.02	
D.	Amend Band 3 Table in the reasoned justification to GN 20 Local Needs Affordable Housing on page 145 of the Deposit Plan by deleting Llanteglos.	FC5.GN20.02	
E.	Amend the Proposals Map to remove the Settlement Boundary for Llanteglos.	FC4.SP07.Llantegetc.01	
F.	Update the Candidate Sites Register March 2025 to reflect that Sites 220, 428 and 434 are not considered suitable for residential development (Category Red 3).	See Other Edit OE8	
G.	The land at Hafod Wen is not considered appropriate for residential development in principle and should not be included into the settlement boundary for Llanteglos nor recognised as a settlement in its own right.	No Change.	
H.	Amend the Proposals Map to show the land currently occupied by an agricultural barn to be included within the Settlement Boundary for Llanteg.	FC4.SP07.Llantegetc.02	
I.	As a consequential amendment remove hard rock safeguarding (Policy GN 38 Safeguarding and Prior Mineral Extraction) from the additional area of land included in Llanteg settlement boundary.	ME12	



Summary of Issues		Raised By	Name (wish to speak at Examination in bold)
J.	As a consequential amendment include hard rock safeguarding (Policy GN 38 Safeguarding and Prior Mineral Extraction) on the Llanteglos area no longer included in a settlement boundary.		ME13

## 4.13 Maesgwynne Fishguard

**Maesgwynne, Fishguard –Should an increased delivery rate be supported at this housing allocation including the introduction of residential care elements and a health care centre?**

### **Residential Allocation S/HSG/034F/LDP2/1 – Maesgwynne, Fishguard**

<b>LDP and Other Document References</b>	<ul style="list-style-type: none"> <li>i) SP 2 – Housing Requirement</li> <li>ii) SP 3 – Affordable Housing Target</li> <li>iii) GN 16 – Residential Allocations</li> <li>iv) GN 19A – Maesgwynne, Fishguard</li> <li>v) Appendix 3 – Supplementary Planning Guidance</li> </ul>
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<b>Summary of Issues</b>	<b>Raised By</b>	<b>Name (wish to speak at Examination in bold)</b>
GN 16 – Residential Allocations - S/HSG/034F/LDP2/1: 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.	<b>4188/1</b>	Wales and West Housing (4188) <b>(represented by Agent 4389 Asbri Planning)</b>
GN 19A – Maesgwynne, Fishguard - S/HSG/034F/LDP2/1: A detailed submission is provided requesting the inclusion of residential care elements and health care centre components as options within the allocation. A commentary on the tests of soundness is also provided.	<b>4188/2</b>	Wales and West Housing (4188) <b>(represented by Agent 4389 Asbri Planning)</b>
SP 2 – Housing Requirement: Whilst the residential allocation under Policy GN 19A Maesgwynne, Fishguard S/HSG/034F/LDP2/1 is supported in principle, an objection is presented to Policy SP 2 'Housing Requirement' and the housing requirement of 6,425 dwellings, enabling delivery for 5,840 units (365 per year). The representor is seeking to improve the deliverability of units during the remaining plan period, from an estimated 22 units per year to 40 units per year. This would enable the allocation to be delivered during the Plan period and would remove the total units to be delivered outside of the Plan period. In summary, the representor believes that the housing requirement should reflect the anticipated enhanced delivery of	<b>4188/3</b>	Wales and West Housing (4188) <b>(represented by Agent 4389 Asbri Planning)</b>

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
residential units as Maesgwynne. A commentary on the tests of soundness is also provided.		
SP 3 – Affordable Housing Target: Whilst the residential allocation under Policy GN 19A Maesgwynne, Fishguard S/HSG/034F/LDP2/1 is supported in principle, an objection is presented to Policy SP 3 ‘Affordable Housing Target’. The representor anticipates that 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, the representor believes that 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.	<b>4188/4</b>	Wales and West Housing (4188) <b>(represented by Agent 4389 Asbri Planning)</b>
Appendix 3: Supplementary Planning Guidance: Support - 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.	4188/5	Wales and West Housing (4188) <b>(represented by Agent 4389 Asbri Planning)</b>
GN 19A – Maesgwynne, Fishguard: Support - In summary, these representations wish to fully support the Pembrokeshire RLDP Second Deposit Plan, including the allocation of Maesgwynne for a residential allocation under Policy GN 16 ‘Residential Allocations’. Wales & West Housing Association is fully committed to the delivery of the allocation, in accordance with the policies of the Replacement Plan (both site-specific and plan-wide policies inclusive).	4188/6	Wales and West Housing (4188) <b>(represented by Agent 4389 Asbri Planning)</b>

## Response

1. **4188/1:** This representation is broadly supportive of the strategic residential allocation at Maesgwynne, Fishguard, which is set out in policies GN 16 and GN 19A of Deposit Plan 2. That support is welcomed. In terms of the detail within policy GN 16, the representation notes that 175 dwellings minimum is proposed for the Plan period (to 2033) with the remaining 167 units identified for delivery beyond the Plan period. The representor notes that this equates to a delivery rate of 22 dwellings per annum across the remainder of the LDP 2 Plan period. The request is that this should be increased to 40 dwellings per annum, which would lead to a delivery during the LDP 2 Plan period of 320 dwellings and by implication a correspondingly much reduced provision beyond the Plan period (or possibly the complete build-out of the site during the LDP 2 Plan period).
2. Residential development on the Maesgwynne site started some years ago (at Parc Loktudi) but has been very significantly delayed due to a highway access issue which was for a long time considered to adversely affect site viability. More recently permission has been granted for a 50-dwelling affordable housing development, referenced in Deposit Plan 2 policy GN 17 as site 034/00165 - West of Clos-y-Bigney. With a new developer now involved and the prospect of a new planning application being submitted for the undeveloped parts of the site in the near future, there is every prospect that development of the remainder of the site can now be achieved and that any remaining highway issues can be resolved. PCC is therefore confident that the restored allocation is deliverable. However, it is also slightly cautious in terms of anticipated delivery rates, given that development of the residual part of the Maesgwynne site has yet to commence and that significant infrastructure investment is likely to be needed in conjunction with the provision of new dwellings.
3. In that context, a delivery rate of 22 dwellings per annum (dpa) minimum for the remainder of the Plan period seems realistic. The 175 dwellings is an integral part of the overall housing provision for the Plan period and hence a substantial increase in the anticipated delivery rate would affect the overall housing provision and result in a mismatch between provision through allocations and the overall provision on which the Plan is predicated. That would be challengeable in its own right and also on the basis of previously modest build rates at Maesgwynne (including built out elements). That said, if a faster build rate than LDP 2 anticipates transpires, then GN 16 is sufficiently flexible to accommodate this (noting that the figure of 175 for the period to 2033 is a minimum) - but in PCC's view, consideration needs to be given to what represents a sensible, phased, roll-out of development over a number of years for a site of this size.
4. **4188/2:** The general support for the residential allocation at Maesgwynne, Fishguard of policy GN 16 and for the more detailed consideration given to the site in policy GN 19A (which relates to the anticipated masterplanning of this strategic housing site) is welcomed. This representation notes that the site could accommodate an expanded range of uses, including a potential residential care facility in use class C2 and a health care centre / clinic in use class D1. These further uses have been put forward following early-stage discussions with potential providers. This representation therefore proposes that GN 19A be modified to provide a 100% residential option and also, as an alternative, a residential-led development with the residential care facility and health care centre / clinic options included. Amended policy wording for GN 19A has been supplied.
5. At this stage, PCC would not wish to rule out consideration of those potential further elements of what might be developed at the Maesgwynne site. It is, however, mindful of the advice in PPW edition 12, paragraph 4.3.21 which notes that 'Some education, healthcare and community uses may have specific accessibility requirements which mean they need to be

located close to the communities they serve'. This matter will require further investigation. PCC is prepared to give consideration to the inclusion of these further uses at the site and hence modifications are proposed to the GN 19A text and its reasoned justification. However, at this stage this falls short of a firm commitment to accept those additional uses. The proposed wording for the related focussed changes reflects a willingness to consider these additional land uses but not a firm commitment to accept them. A potential implication of allowing more non-residential uses onto the site would be to reduce the potential to deliver new housing, hence some caution is needed as it will be important to ensure that the housing delivery aspirations of LDP 2 are not undermined by over-providing non-residential uses within the allocation area.

6. **4188/3:** The housing requirement for LDP 2 is set out in policy SP 2 and explained in the reasoned justification to the policy. This is supported by the Plan's evidence base. The growth strategy to deliver 5,840 new homes over the plan period 2017 to 2033 has had a 10% flexibility allowance applied, increasing the provision to 6,425 dwellings. Paragraph 4.10 explains that the chosen growth scenario for LDP 2 is based on an average of three scenarios. Paragraph 4.11 explains that this provides a figure that is higher than the Welsh Government projection and is considered to be deliverable (in line with historic build rates), to reflect longer term migration trends, to assist in meeting the affordable housing backlog, to support the local building industry and the wider economy, to deliver a more balanced population profile, to take account of the Natural Resources Wales phosphates guidance and to complement the provision of new jobs during the Plan period.
7. **4188/4:** 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. 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.
8. **4188/5 and 4188/6:** Support welcomed. No change required.

## Conclusion

9. In most cases, no changes to the Plan are proposed to address the issues raised. However, Focussed Changes to policy GN 19A – Maesgwynne, Fishguard, are proposed, as set out in FC5.GN19A.Maesgwynne.01 and FC5.GN19A.Maesgwynne.02.

Recommendation	Focussed Change/Edit Ref
A. <b>Policy GN 19A – Maesgwynne, Fishguard:</b> Add the following additional sentence to the end of paragraph 1 of the policy text: <b><u>Proposals for residential care and /or a health centre / clinic within the site area will also be considered, their acceptability being subject to detailed consideration of conformity with Welsh Government policy on accessibility of services and to their being no significant adverse effect on the capacity of the site to deliver new homes.</u></b>	FC5.GN19A.Maesgwynne.01 and

B.	Amend reasoned justification paragraph 5.112, by adding the following sentence at the end of the paragraph: <b><u>In the event that proposals to provide residential care accommodation and / or a health centre / clinic are accepted, in principle, for inclusion within the site, then these too should be incorporated into the masterplan.</u></b>	FC5.GN19A.Maesgwynne.02
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## 4.14 Milford Haven Housing

Milford Haven Housing Allocations and Commitments	
<b>LDP and Other Document References</b>	i) SP 6 Settlement Hierarchy ii) SP 7 Settlement Boundaries iii) GN 10 Mixed-use proposals iv) GN 16 Residential Development v) GN 17 Residential Commitments vi) GN 46 Coastal Change vii) Deposit Plan Appendix 2: Housing Components and Trajectory viii) Proposals Map Milford Haven ix) Candidate Sites' Register

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
Representations related in <b>SP 6 Settlement Hierarchy</b> in respect of Milford Haven		
Support Milford Haven's identification as an Urban settlement and being one of four towns identified as a Reginal Growth Centre in policy SP 6.	<b>34657/2</b> 4428/1	<b>M Owens, A Owens, A Owens and J Owens</b> Port of Milford Haven
Representations related to <b>South West of The Meads, Milford Haven</b> HSG/086/00222		
A water supply can be provided for HSG/086/00222. Milford Haven Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed development site. Site is crossed by 225mm & 375mm diameter sewers.	2603/22	Dŵr Cymru
Representations related to <b>Land at Myrtle Meadows, Steynton, Milford Haven</b> HSG/086/LDP2/1		
A water supply can be provided for HSG/086/LDP2/1. Milford Haven Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed development site. A hydraulic modelling assessment (HMA) will be required to determine the point of connection to the public sewerage system and potential developers would be expected to fund investigations during preplanning stages. Site is crossed by 100mm & 250mm diameter sewers.	2603/23	Dŵr Cymru
<b>Policy GN 16 Residential Allocations</b> in relation to allocation HSG/086/LDP2/1. Support for site's inclusion.	<b>34550/2</b>	<b>L Greggain &amp; Co Ltd</b>
<b>Policy GN 16 Residential Allocations</b> in relation to allocation HSG/086/LDP2/1. Object	<b>34550/10</b>	<b>L Greggain &amp; Co Ltd</b>



Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
to the minimum units being 60 as the site has been promoted for 63 units.		
<b>Deposit Plan Appendix 2</b> - Housing Components and Trajectory in relation to allocation HSG/086/LDP2/1. The site promotor has a track record of delivery of sites of a similar size in the locality that is not reflected in the trajectory for HSG/086/LDP2/1, as it is anticipated that the site could yield completions by 2026/27 and at a higher rate.	34550/8	<b>L Greggain &amp; Co Ltd</b>
<b>Representations related to East of Castle Pill Road, Steynton, Milford Haven HSG/086/LDP2/2</b>		
A water supply can be provided for HSG/086/LDP2/2. Milford Haven Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed development site. A hydraulic modelling assessment (HMA) will be required to determine the point of connection to the public sewerage system and potential developers would be expected to fund investigations during preplanning stages.	2603/24	Dŵr Cymru
<b>Representations related to East of Castle Pill Road, Steynton, Milford Haven HSG/086/LDP2/2 &amp; South of Conway Drive, Steynton, Milford Haven S/HSG/086/LDP2/3</b>		
<p>Objection to allocating HSG/086/LDP2/2 &amp; S/HSG/086/LDP2/3 on the basis of:</p> <ul style="list-style-type: none"> <li>▪ The reasons listed in the Site Assessment Report October 2010 for not allocating the site in the LDP adopted 28<sup>th</sup> February 2013 are in the case of HSG/086/LDP2/2, advice from the Highway Authority and for S/HSG/086/LDP2/3 the site was peripheral to the town and therefore inappropriate for development.</li> <li>▪ Safety of highway access at the junction between Castle Pill Road and the A4076 trunk road, given that the Highway Authority previously objected in 2010 and there have been a number of accidents recently. There are also a number of amenities located in close proximity, which means a high number of pedestrians use the nearby crossings.</li> <li>▪ Loss of greenfield land populated with mature trees and hedgerows, which support local wildlife and provide enjoyment to residents and walkers.</li> </ul>	4027/1	Mr J Matthews

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
<ul style="list-style-type: none"> <li>Potential increase in surface water flooding.</li> <li>Steynton losing its identity if the sites are developed, leading to merging with the wider Milford Haven.</li> <li>Phasing of development HSG/086/LDP2/2 in combination with neighbouring allocation S/HSG/086/LDP2/3 could see some existing residential areas subjected to increased traffic, noise, dust and associated health and safety risks for in excess of 15 years, due to the phasing of development contained in Appendix 2 of the Deposit Plan.</li> </ul>		
Representations related to <b>South of Conway Drive, Steynton, Milford Haven S/HSG/086/LDP2/3</b>		
<p>Objection to allocating S/HSG/086/LDP2/3 on the basis of:</p> <ul style="list-style-type: none"> <li>Loss of potential sites for additional wind turbines several of which already operate nearby</li> </ul>	4027/1	Mr J Matthews
A water supply can be provided for S/HSG/086/LDP2/3. Milford Haven Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed development site. A hydraulic modelling assessment (HMA) will be required to determine the point of connection to the public sewerage system and potential developers would be expected to fund investigations during preplanning stages.	2603/13	Dŵr Cymru
<b>Policy GN 16 Residential Allocations</b> in relation to allocation S/HSG/086/LDP2/3. Support for site's inclusion but also objection in relation to allocation S/HSG/086/LDP2/3. Object to units being included beyond the Plan period when the site could come forward within the Plan period and consider the potential for self-build.	34657/1	<b>M Owens, A Owens, A Owens and J Owens</b>
Appendix 2 in relation to allocation S/HSG/086/LDP2/3. Object to units being included beyond the Plan period when the whole site could come forward within the Plan period and the timing of delivery	34657/4	<b>M Owens, A Owens, A Owens and J Owens</b>
<b>Policy GN 16 Residential Allocations</b> in relation to allocation S/HSG/086/LDP2/3. Object to the deliverability of the allocation on the grounds of highway access constraints and lack of supporting infrastructure services to support the development.	34550/1	<b>L Greggain &amp; Co Ltd</b>

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
Representations related to <b>Former Hakin Infants School, Milford Haven HSG/086/LDP2/4</b>		
A water supply can be provided for HSG/086/LDP2/4. The public sewerage network and Milford Haven Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed development site.	2603/25	Dŵr Cymru
<b>Policy GN 16 Residential Allocations</b> in relation to allocation HSG/086/LDP2/4. The site resides within the housing department's portfolio and is within the department's development programme. The developer states that the site is within the longer-term development program.	PCC Housing/2	Pembrokeshire County Council – Housing Department
Object to the site being identified as 100% affordable housing. This is on the basis that Former Hubberston VC School, Milford Haven HSG/086/LDP2/5 and Former Hakin Junior School, Milford Haven HSG/086/LDP2/6 are in close proximity, which are both identified as 100% affordable housing and the housing department wants to avoid over supplying the area with social housing and instead providing the area with a mixed community. PCC Housing would request that the affordable percentage is dropped to 0% and taking into account Policy GN 20 Local Needs Affordable Housing and the fact Hakin is a Band 1 area then a potential commuted sum could be offered if the site is sold as open market. This option may provide us with funding to help accelerate delivery of some of the larger sites in Hakin. It may also mean that housing could be developed sooner by either PCC or a private developer.	PCC Housing/4	Pembrokeshire County Council – Housing Department
Representations related to <b>Former Hubberston VC School, Milford Haven HSG/086/LDP2/5</b>		
A water supply can be provided for HSG/086/LDP2/5. The public sewerage network and Milford Haven Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed development site.	2603/26	Dŵr Cymru
<b>Policy GN 16 Residential Allocations</b> in relation to allocation HSG/086/LDP2/5. The site resides within the housing department's portfolio and is within the department's development programme. A planning application is due to be submitted this year (2025) for 30+ units. Construction start will be dependent on availability of Social Housing Grant.	PCC Housing/3	Pembrokeshire County Council – Housing Department

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
Object to the site being identified as 100% affordable housing. PCC housing requests that the levels of affordable units are reduced to 50% to help provide flexibility and to cater for an element of Shared (Welsh Government model) and potentially open market if we decide to move in that direction.	PCC Housing/4	Pembrokeshire County Council – Housing Department
Representations related to <b>Former Hakin Junior School, Milford Haven HSG/086/LDP2/6</b>		
A water supply can be provided for HSG/086/LDP2/6. The public sewerage network and Milford Haven Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed development site.	2603/27	Dŵr Cymru
Object to the site being identified as 100% affordable housing. PCC housing requests that the levels of affordable units are reduced to 50% to help provide flexibility and to cater for an element of Shared (Welsh Government model) and potentially open market if we decide to move in that direction.	PCC Housing/4	Pembrokeshire County Council – Housing Department
Representations related to <b>Land North East of Beaconsing, Steynton, Milford Haven HSG/086/LDP2/7</b>		
A water supply can be provided for HSG/086/LDP2/7. Milford Haven Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed development site. A hydraulic modelling assessment (HMA) may be required to determine the point of connection to the public sewerage system and potential developers would be expected to fund investigations during preplanning stages.	2603/28	Dŵr Cymru
Representations related to <b>Land at Milford Marina 086/00377</b>		
Support the inclusion of 086/00377 in <b>policy GN 17 Residential Commitments</b>	4428/2	Port of Milford Haven
Object to only 45 of the 190 units granted by outline planning permission 14/0158/PA being included as commitment as the full amount can be delivered in the remaining 9 Plan years. The objection cites the delivery of the hotel under reserved matters reference 19/0948/PA and Quay Stores under reference 19/0938/PA as evidence of the outline consent being delivered.	4428/2	Port of Milford Haven
Representations related to <b>Land at Castle Pill Candidate Site 334</b>		
Objection to the site being excluded from the settlement boundary for Milford Haven, following the candidate site assessment. The representation states that the majority of the site	4428/5	Port of Milford Haven

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
lies outside of Flood Map for Planning zones 2 and 3. The submission also objects to Ecology concerns and Greenfield categorisation on the basis that this could be managed through sensitive development and achieve on-site biodiversity net gain.		

Response
<ol style="list-style-type: none"> <li><b>SP 6 Settlement Hierarchy in respect of Milford Haven:</b> Deposit Plan SP 6 Milford Haven – Support for Milford Haven being identified as a Regional Growth Area within the Urban Settlement tier welcomed.</li> <li><b>South West of The Meads, Milford Haven:</b> Deposit Plan GN 16 Residential Allocations HSG/086/00222 – Dŵr Cymru comments noted.</li> <li><b>Land at Myrtle Meadows, Steynton, Milford Haven:</b> Deposit Plan GN 16 Residential Allocations HSG/086/LDP2/1 – Dŵr Cymru comments noted.</li> <li>Deposit Plan GN 16 HSG/086/LDP2/1 – Support for the site’s allocation welcomed.</li> <li>Deposit Plan GN 16 HSG/086/LDP2/1 Minimum Units in Plan period – The policy stipulates a minimum number of units in the plan period to ensure best use of land, whilst taking into account site constraints. This would not prejudice a subsequent planning application being submitted for a higher number of units. A Focussed Change is also proposed to insert the word ‘Expected’ at the top of the 4<sup>th</sup> and 8<sup>th</sup> column of the allocations table in Policy GN 16 Residential Allocations.</li> <li>Deposit Plan Appendix 2: Housing Components and Trajectory in relation to allocation HSG/086/LDP2/1 - The replacement LDP2 timeline suggests that it would not be possible to have completed units by April 2027, as the Plan is only scheduled for adoption in mid-2026. When the time lag to construction is factored in, it is considered that the site would most likely begin yielding completions by April 2029 as per the Deposit 2 Plan. In terms of rate of delivery, the Joint Housing Land Availability Study (JHLAS) for 2012 to 2020 and Housing Delivery Assessment (HDA) 2020 to 2024 for 086/00226 (Bunkers Hill) and 086/00129 (Beaconing Fields) shows a delivery of 11 dwellings per annum (DPA) for Greggain Ltd. As the trajectory already includes a higher delivery rate it is not considered appropriate to increase the number of units per annum.</li> <li><b>East of Castle Pill Road, Steynton HSG/086/LDP2/2:</b> Deposit Plan GN 16 HSG/086/LDP2/2 – Dŵr Cymru comments noted.</li> <li><b>East of Castle Pill Road, Steynton, Milford Haven HSG/086/LDP2/2 &amp; South of Conway Drive, Steynton, Milford Haven S/HSG/086/LDP2/3</b> – In response to objections submitted on various grounds: <ol style="list-style-type: none"> <li><b>Highways:</b> The Council’s Highway Authority (CHA) has not objected to the allocation of the site. The Welsh Government Transport Division responsible for the trunk road</li> </ol> </li> </ol>

network also did not object to the site being allocated. The latter has required a Transport Statement/Assessment to determine the impact and any mitigation measures required for Steynton Cross roads. The Site Assessment Report dated October 2010 was produced in support of the LDP that was adopted 28<sup>th</sup> February 2013 and has been superseded by the Candidate Sites' Register and Site Assessment (September 2024).

- b) **Greenfield site:** When allocating land for development, brownfield is preferential but there was insufficient land available to meet the housing needs of Milford Haven, so greenfield land has been allocated. Planning Policy Wales (edition 12) requires all trees and hedgerows to be retained whenever possible and mitigation where appropriate to maintain biodiversity. Planning Policy Wales also requires a net gain in biodiversity to be provided by all forms of development. There may be a need to translocate the hedge along the western boundary of East of Castle Pill Road to facilitate access to South of Conway Drive, but this is a detailed matter that would be considered at the planning application stage.
  - c) **Surface Water:** All developments of 1 or more dwellings require Sustainable Drainage Systems (SuDS) Approval Body (SAB) consent in relation to surface water to prevent issues such as those described in the representation.
  - d) The built form of Milford Haven and Steynton joined some decades ago. The Deposit 2 Plan considers Steynton to be part of Milford Haven and is within the settlement boundary, which is the same as LDP adopted 28<sup>th</sup> February 2013 and the Joint Unitary Development Plan adopted 28<sup>th</sup> June 2006.
  - e) Whilst the construction of houses inevitably will impact existing areas, larger housing sites require a Construction Environmental Management Plan (CEMP) to mitigate and reduce the impact. The smaller allocation may not require a CEMP but conditions can be used to define working hours and maintain good site management.
9. **South of Conway Drive, Steynton, Milford Haven S/HSG/086/LDP2/3:** The land was promoted for residential use and considered appropriate to allocate for residential use. The loss of potential for another land use such as wind turbines is not a material consideration as no opposing proposals were put forward requesting the site or any neighbouring land for such purposes. Deposit Plan GN 16 S/HSG/086/LDP2/3 – Dŵr Cymru comments noted.
10. Deposit Plan GN 16 Residential Allocations S/HSG/086/LDP2/3 – Support for the site's allocation welcomed.
11. Deposit Plan Policy GN 16 Residential Allocations Deposit Plan Appendix 2: Housing Components and Trajectory and S/HSG/086/LDP2/3 – The representation states this is a landowner-led scheme. Whilst self-building has been suggested as a potential delivery vehicle for some of the site, the Council is not aware if a developer has been engaged to support the claim that the whole site could be delivered within the Plan period. Annual Monitoring Reports (AMRs) also show that large allocations take time to deliver, with some requiring allocation in successive plans before coming to fruition. To avoid the potential for significant under-delivery, only a portion of the total units have been included within the expected minimum units within the Plan period column. As the site promotor is supportive of self-build, this aspect of Policy GN 16 Residential Allocations can be amended with a minor edit proposed.

12. Deposit Plan GN 16 S/HSG/086/LDP2/3 (see Map attached to identify sites referred to in this response) – One representator objects to the allocation of the site on three grounds which are responded to below:

- a) The objector has obtained a copy of the indicative layout for the site which lies to the north of the allocation site (Beaconing Drive) and has argued that the highway access via 086/00129 Beaconing Field (which is under construction) is not possible, as it would require at least two of the houses (at the time of writing) not to be built, and for a section of the under-construction road to be upgraded. This is matter that can be addressed as part of the masterplan required by GN 19B South of Conway Drive, Castle Pill Road, Steynton, S/HSG/086/LDP2/3, as a road known as Hilton View (at the time of writing) is due to be built up to the boundary with S/HSG/086/LDP2/3 South of Conway Drive, Steynton, Milford Haven, and can provide an access to the South of Conway Drive site. This has been confirmed by the Council's Highway Authority.
- b) The objector advises that a secondary access via Castle Pill Road on the western boundary of the allocation is sub-standard at two locations and therefore unsuitable for additional vehicles in addition to another allocation known as HSG/086/LDP2/2 East of Castle Pill Road, Steynton which will also be accessed via the same road. In terms of the point where the carriageway width reduces to a single lane, the site promotor for South of Conway Drive owns the land alongside neighbouring allocation HSG/086/LDP2/2 and could widen the lane to recognised standards to address this issue. This option would require hedgerow translocation to be undertaken. There is also an option for South of Conway Drive to be accessed via HSG/086/LDP2/2, which would remove any need for the hedgerow translocation. In respect of the road width near the junction with the A4076 trunk road, the Council's Highway Authority are satisfied that some of the allocation South of Conway Drive can utilise Castle Pill Road, subject to a Traffic Assessment. This is therefore considered to be a matter that can be addressed through the master planning and subsequent planning application.
- c) With regard to services, namely foul water and electricity, the objector advises that there is limited capacity in the local foul system and electricity network. Representation 2603/13 by Dwr Cymru confirms that there is capacity at the wastewater treatment works, but it would be for the site developer to undertake hydraulic testing in the local network to determine the point of connection. This is therefore considered to be a matter that would be addressed at the planning application stage. In terms of electricity, the objection states that there may be limited capacity within the local network. In terms of connection to the National Grid, this is considered to be a matter that would be addressed at the pre-construction stage after obtaining planning permission.

13. **Former Hakin Infants School, Milford Haven Deposit Plan Policy GN 16 Residential Allocation:** HSG/086/LDP2/4: – Dŵr Cymru comments noted.

14. Deposit Plan GN 16 HSG/086/LDP2/4 – Support for the site's allocation welcomed.

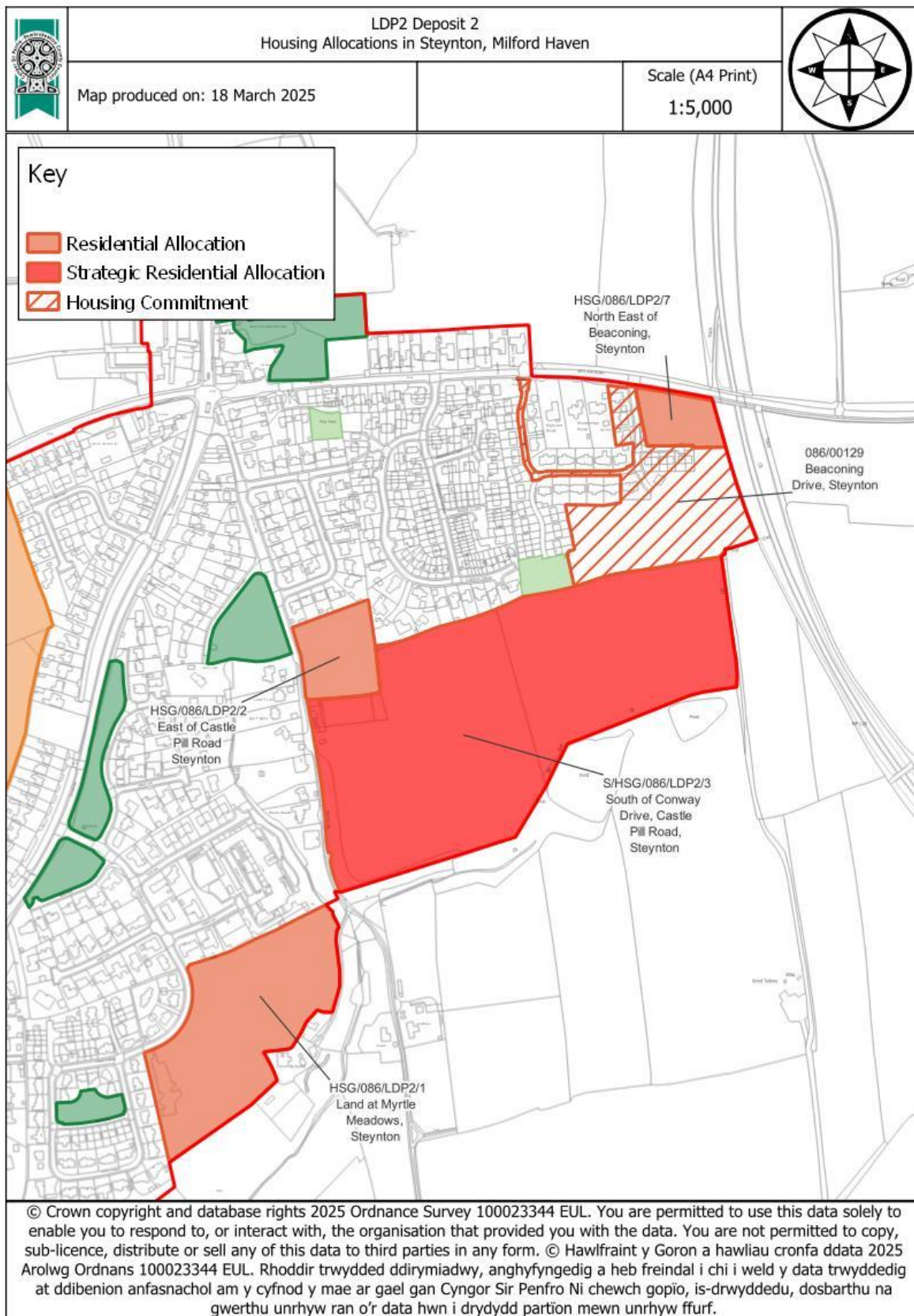
15. Deposit Plan Appendix 2: Housing Components and Trajectory HSG/086/LDP2/4 – The site developer states this site is within their longer-term development plans, so will not come to fruition for a number of years. The profile for the site's development in the Trajectory expects the site to deliver units in 2028/29 and 2029/30, so this is in alignment the Deposit Plan expectations. No change is needed.



16. **Former Hubberston VC School, Milford Haven Deposit Plan Policy GN 16 Residential Allocations HSG/086/LDP2/5:** – Dŵr Cymru comments noted.
17. Deposit Plan GN 16 HSG/086/LDP2/5 – Support for the site’s allocation welcomed. The site is expected to deliver a minimum number of 26 units, whilst a planning application is due to be submitted for 30+ units. As the figure in the Plan is an expected minimum, the planning application can be submitted for more units. A Focussed Change is also proposed to insert the word ‘Expected’ at the top of the 4<sup>th</sup> and 8<sup>th</sup> column of the allocations table in Policy GN 16 Residential Allocations.
18. Deposit Plan Appendix 2: Housing Components and Trajectory HSG/086/LDP2/5 – The site promotor states that a planning application is due to be submitted this year (2025) with construction then dependant on Social Housing Grant availability. This is in alignment with the Deposit Plan’s expectations for delivery timescale.
19. With regard to the representations received requesting different mixes of housing for the above school sites, it is understood that the Council’s intention for this Plan’s preparation was to lead by example in terms of promoting the delivery of affordable housing on sites retained by the Housing Department. The point raised with regard to mix is understood and intended to ensure there is a range of types of affordable housing proposed. Changes are proposed to the definition of what the term affordable housing means and expectations for the percentage of social rented housing required as opposed to other forms of affordable housing. These changes are proposed to the Glossary of Terms and to Policy SP 3 Affordable Housing Target.
20. **HSG/086/LDP2/6 Former Hakin Junior School, Milford Haven Deposit Plan Policy GN 16 Residential Allocation HSG/086/LDP2/6:** – Dŵr Cymru comments noted.
21. **Land North East of Beaoning, Steynton, Milford Haven Deposit Plan Policy GN 16 Residential Allocation HSG/086/LDP2/7:** – Dŵr Cymru comments noted.
22. **Land at Milford Marina Deposit Plan GN 17 Residential Commitments 086/00377:** – Support for the site being identified as a housing commitment welcomed.
23. Deposit Plan GN 17 086/00377 – The site promotor advises that the entirety of the site can be delivered in the remaining Plan period. Whilst one element of the outline planning permission has been delivered with reserved matters approved for a further element to date, no reserved matters application has been submitted for the residential aspect of the scheme. As the outline planning permission was approved 01/11/19, which at the time of writing is over 5 years ago, there is little certainty that a residential scheme of this scale in a Pembrokeshire context will be delivered within the remaining 9 years of the Plan period, when no progress has been made in the intervening 5 years since the outline planning permission. As a result, a 75% discount (with rounding) was applied to the number of units counted within the Plan period. It should be noted that whilst this was the conclusion, there would be nothing to prevent the site promotor from bringing the site forward as per the outline planning permission and thereby deliver the 190 units.
24. **Land at Castle Pill, Milford Haven candidate site 334** Deposit Plan SP 7 – The site promotor objects to the exclusion of the site from the settlement boundary, following the

assessment of Candidate Site 334. It is accepted that only a small portion of the site is covered by zones 2 and 3 of Flood Map for Planning (FMfP) and the remainder of the site could be considered for inclusion within the settlement boundary. However, whilst the representation states that the ecology concerns could be mitigated, no evidence has been provided to substantiate this statement. On this basis, the candidate site assessment outcome should remain unchanged and therefore the site should be excluded from the settlement boundary for Milford Haven.

<b>Recommendations</b>		<b>Focussed Change/Edit Ref</b>
A.	No change to GN 16 Residential Allocations LDP2 Reference HSG/086/LDP2/1 Land at Myrtle Meadows, Steynton, Milford Haven.	No change
B.	No change to the Housing Trajectory for HSG/086/LDP2/1 Land at Myrtle Meadows, Steynton, Milford Haven.	No change
C.	Add the word 'Expected' to the start of the 4 <sup>th</sup> and 8 <sup>th</sup> column names of GN 16 Residential Allocations.	FC5.GN16.01
D.	Change Potential for Self-Build Indicated By Site Promotor to 'Yes' GN 16 Residential Allocations LDP2 Reference S/HSG/086/LDP2/3 South of Conway Drive, Castle Pill Road, Steynton, Milford Haven.	ME9
E.	No change to the Housing Trajectory for S/HSG/086/LDP2/3 South of Conway Drive, Castle Pill Road, Steynton, Milford Haven.	No change
F.	No change to GN 16 Residential Allocations LDP2 Reference HSG/086/LDP2/4 Former Hakin Infants' School, Milford Haven. Change proposed to the definition of affordable housing in the Glossary of Terms. Change also proposed to identify the split between social rented affordable housing requirements and other forms of intermediate housing.	<b>FC1. Context.01</b> <b>FC4.SP03.01</b>
G.	No change to the Housing Trajectory for HSG/086/LDP2/4 Former Hakin Infants' School, Milford Haven. Change proposed to the definition of affordable housing in the Glossary of Terms. Change also proposed to identify the split between social rented affordable housing requirements and other forms of intermediate housing.	<b>FC1. Context.01</b> <b>FC4.SP03.01</b>
H.	No change to GN 16 Residential Allocations LDP2 Reference HSG/086/LDP2/5 Former Hubberston VC School, Hakin, Milford Haven. Change proposed to the definition of affordable housing in the Glossary of Terms. Change also proposed to identify the split between social rented affordable housing requirements and other forms of intermediate housing.	<b>FC1. Context.01</b> <b>FC4.SP03.01</b>
I.	No change to the Housing Trajectory for HSG/086/LDP2/5 Former Hubberston VC School, Hakin, Milford Haven.	No change
J.	No change to the Housing Trajectory for HSG/086/LDP2/6 Former Hakin Junior School, Milford Haven.	No change
K.	No change to GN 16 Residential Allocations LDP2 Reference HSG/086/LDP2/7 North East of Beaconsing, Steynton, Milford Haven.	No change
L.	No change to SP 7 Settlement Boundaries in relation to Milford Haven and candidate site 334 Land at Castle Pill, Milford Haven.	No change



## 4.15 Milford Haven Other

<b>Milford Haven Non-Residential Allocations and Designations – is the Plan setting out an appropriate framework for considering proposals coming forward?</b>		
<b>LDP and Other Document References</b>	i) SP 6 Settlement Hierarchy ii) SP 13 Port and Energy Related Development and Celtic Freeport iii) SP 14 Strategic Employment Provision iv) GN 30 Community Facility Allocations v) Proposals Map Milford Haven vi) Candidate Sites' Register	
<b>Summary of Issues</b>	<b>Raised By</b>	<b>Name (wish to speak at Examination in bold)</b>
Representations related in <b>SP 6 Settlement Hierarchy</b> in respect of Milford Haven		
Support Milford Haven's identification as an Urban settlement and being one of four towns identified as a Reginal Growth Centre in policy SP 6.	<b>34657/2</b> 4428/1	<b>M Owens, A Owens, A Owens and J Owens</b> Port of Milford Haven
Representations related to <b>New Primary and Secondary Schools, Milford Haven CF/086/LDP2/01</b>		
A water supply can be provided for CF/086/LDP2/01. Milford Haven Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed development site. A hydraulic modelling assessment (HMA) will be required to assess capacity and determine the point of connection to the public sewerage system. The developer would be expected to fund investigations during preplanning stages. Site is crossed by a 150mm diameter sewer.	2603/82	Dŵr Cymru
Representations related to <b>Hayguard Hay, Thornton S/EMP/086/LDP2/01</b>		
No watermain crossing the site. No sewers crossing the site. Site is in the catchment area of Milford Haven WwTW.	2603/90	Dŵr Cymru
Support for allocating the site, particularly in light of the Celtic Freeport as the site can address the newly arising needs to support Freeport due to its location.	1881/1	I Bannister
Representations related to <b>Milford Waterfront</b> requesting a new policy		
The representation requests that Milford Waterfront has a dedicated policy to recognise its ability to provide a mixed development of housing, leisure employment, as granted outline planning permission under reference 14/0158/PA, to provide certainty for the developer, Port of Milford Haven. The submission states that this would be consistent with	4428/4	Port of Milford Haven

policies SP2 Housing Requirement, SP3 Affordable Housing Target, SP 5 Supporting Prosperity, SP 8 Regional Growth Areas and Urban Settlements, alongside the port related uses supported by policy SP 13 Port and Energy Related Development and Celtic Freeport.		
<b>Representations related to SP 13 Port and Energy Related Development and Celtic Freeport</b>		
Support the policy including Port locations including Milford Haven. Also support the Council amending SP 13 to include Celtic Freeport, following the successful bid.	4428/3	Port of Milford Haven
Request for the area covered by SP 13 to be extended to cover <b>Land at Castle Pill</b> , which was submitted as <b>Candidate Site 334</b> to enable the delivery of associated facilities and infrastructure in alignment with the aspirations of the policy.	4428/6	Port of Milford Haven
<b>Response</b>		
<ol style="list-style-type: none"> <li><b>SP 6 Settlement Hierarchy in respect of Milford Haven:</b> Deposit Plan SP 6 Milford Haven – Support for Milford Haven being identified as a Regional Growth Area within the Urban Settlement tier is welcomed.</li> <li><b>GN 30 Community Facility Allocations: New Primary and Secondary Schools, Milford Haven CF/086/LDP2/01</b> - Dŵr Cymru comments noted.</li> <li><b>SP 14 Strategic Employment Provision: Hayguard Hay, Thornton S/EMP/086/LDP2/01</b> - Dŵr Cymru comments noted.</li> <li>Support for the site's allocation welcomed.</li> <li><b>Milford Waterfront: Request for a dedicated policy</b> - The land granted outline planning permission for a mixed-use development under reference 14/0158/PA is within the settlement boundary of Milford Haven as shown on the Proposals Map. The town is recognised as a Regional Growth area within the Urban Settlement Tier of SP 6 Settlement Hierarchy. Policy SP 8 Regional Growth Areas and Urban Settlements sets out the types of development that would be acceptable in principle within this tier of the hierarchy, which includes commercial, retail, employment, tourism, leisure, recreational, green infrastructure and community facilities. It is therefore considered that as Milford Waterfront could contribute to a number of different needs and land use types, the policy framework of the plan would serve as the most appropriate mechanism to determine planning applications.</li> <li><b>SP 13 Port and Energy Related Development and Celtic Freeport:</b> Support for the policy and Deposit Plan 2 including Celtic Freeport welcomed.</li> <li>Request for <b>Land at Castle Pill, Milford Haven Candidate Site 334</b> to be included within the area defined by Policy SP 13. The site promotor objects to the exclusion of the site from the defined port, energy and freeport designation. The candidate site was put forward as a mixed-use development of Housing, Employment, Retail, Boat Yard and Leisure. It was unsuccessful due to flood risk and ecology concerns. See representation reference 4428/2 in the Milford Haven Housing Issues Paper. This paper considers the request for the site to be included within the settlement boundary. The remaining uses, particularly the employment and boat yard</li> </ol>		



elements can be considered in relation to Policy SP 13 Port and Energy Related Development and Celtic Freeport. Employment and maritime (boat yard) land uses could be considered to be water compatible, and it is accepted that only a small portion of the site is covered by zones 2 and 3 of Flood Map for Planning (FMfP). It is accepted that there is potential for this constraint to be overcome. This would leave the ecology objection, which relates to the land now blending into the surrounding landscape and now being considered as greenfield not previously developed land. Whilst the representation states that the ecology concerns raised by the candidate site assessment process could be mitigated, no evidence has been provided to substantiate this statement. On this basis, the candidate site assessment outcome to exclude the site from the settlement boundary is considered to be the appropriate approach. It is also considered appropriate to exclude the site from the SP 13 Port and Energy Related Development and Celtic Freeport designation.

Recommendations		Focussed Change/Edit Ref
A.	No change to SP 6 Settlement Hierarchy in respect of Milford Haven	No change
B.	No change to GN 30 Community Facility Allocations: New Primary and Secondary Schools, Milford Haven CF/086/LDP2/01	No change
C.	No change to SP 14 Strategic Employment Provision: Hayguard Hay, Thornton S/EMP/086/LDP2/01	No change
D.	No change/additional policy for Milford Waterfront	No change
E.	No change to SP 13 Port and Energy Related Development and Celtic Freeport	No change
F.	No change to SP 13 in relation to Milford Haven and Land at Castle Pill, Milford Haven candidate site 334	No change

## 4.16 New Hedges Lidl at Park House

Park House, New Hedges: Should the land should be allocated for a new Lidl Store?	
LDP and Other Document References	<ul style="list-style-type: none"> <li>i) Proposals Map</li> <li>ii) SP 16 Retail Hierarchy</li> <li>iii) LDP2 Vision and Objectives</li> <li>iv) SP 20 Transport Infrastructure and Accessibility</li> <li>v) GN 21 Exception Sites for Local Needs Affordable Housing</li> <li>vi) GN 23 Specialist and Supported Accommodation Allocations</li> <li>vii) GN 32 Out-of-Centre Retail and Commercial Development</li> <li>viii) Candidate Site Register – Candidate Site 154</li> <li>ix) PCC/PCNPA Statement of Common Ground</li> <li>x) South West Wales Regional Retail study</li> <li>xi) PCC Retail Survey 2023</li> <li>xii) Background Paper – Retail and Commercial Centres</li> </ul>

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
1. The <b>Vision and Objectives</b> of LDP2 need to be updated to reference the relationship of the Plan with Pembrokeshire Coast National Park Planning area particularly in relation to retail need and planning for future development requirements.	4390/2 4390/3	Lidl GB Ltd (Agent Carney Sweeney)
2. The <b>Statement of Common Ground with the National Park Authority</b> and the South-West Wales Regional Retail study (2017) are not an appropriate/sufficient evidence base and <b>need to be updated</b> .	4390/4 4390/6	Lidl GB Ltd (Agent Carney Sweeney)
3. <b>The 2017 South-West Wales Regional Retail Study is flawed</b> for the following reasons: <ul style="list-style-type: none"> <li>i. Population and expenditure projections are out-of-date;</li> <li>ii. Assessment is required of the assumption that the capacity forecasts are based on market shares remaining in equilibrium; and</li> <li>iii. The Study recognises that there is potential for increased market shares from new store openings which would lead to long-term increase in forecast capacity.</li> </ul>	4390/6 4390/7 4390/8 4390/9	Lidl GB Ltd (Agent Carney Sweeney)
4. <b>Land at Park House, New Hedges should be allocated for retail use</b> for the following reasons: <ul style="list-style-type: none"> <li>i. It will support Plan Objectives C, D and I through employment generation; boosting the</li> </ul>	4390/2 4390/3	Lidl GB Ltd (Agent Carney Sweeney)



Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
<p>local economy and reducing the need for commuting; supporting the existing and growing population of Tenby and areas to the north; by providing active-travel improvement opportunities to employment, services and facilities.</p> <p>ii. Leakage of expenditure from Tenby to other areas such as Pembroke Dock;</p> <p>iii. Identified need for Tenby to retain its relative retail position in the hierarchy is not planned for in PCC's LDP2;</p> <p>iv. There are no other suitable, available and viable sequentially preferable sites available to address identified need.</p>		
<p>5. <b>No allocations for retail development have been included in LDP2.</b> The Park House site is the most sequentially preferable, suitable and available location to meet identified need.</p>	4390/3	Lidl GB Ltd (Agent Carney Sweeney)
<p>6. Whilst out-of-date the Retail Study concludes that <b>Tenby and nearby settlements are poorly served in retail terms.</b></p>	4390/3 4390/6	Lidl GB Ltd (Agent Carney Sweeney)
<p>7. <b>Allocation SSA/089/LDP2/01</b> East of Park House, Tenby for specialist and supported accommodation <b>would compromise the effectiveness of LDP2 to meet the retail needs of the National Park and surrounds.</b></p>	4390/5 4390/10	Lidl GB Ltd (Agent Carney Sweeney)
<p>8. <b>Policy GN 32 (Out-of-Centre Retail and Commercial Development)</b> should be expanded to recognise that additional retail development is needed to meet the retail needs of settlements beyond the Authority boundary, with specific reference to Pembrokeshire Coast National Park.</p>	4390/11 4390/9	Lidl GB Ltd (Agent Carney Sweeney)
<p>9. <b>Policy SP 16 (Retail Hierarchy) and supporting text</b> should be expanded to recognise that additional development in Pembrokeshire is required to address the retail needs of settlements, with specific reference to Tenby.</p>	4390/12	Lidl GB Ltd (Agent Carney Sweeney)
<p>10. <b>Policy SP 20 (Transport Infrastructure and Accessibility)</b> is supported. Development of Candidate Site 154 at Park House for retail use offers active travel opportunities between Tenby and New Hedges.</p>	4390/13	Lidl GB Ltd (Agent Carney Sweeney)

Response
<p>1. The proposed site is situated to the south of New Hedges and to the west of and alongside the A478 which is the main route into Tenby. The road forms the boundary of the National Park which lies to the east. The settlements of Tenby and Saundersfoot to the east are within the</p>

National Park and in the planning jurisdiction of Pembrokeshire Coast National Park Authority. The land originally formed the grounds of an estate known as Park House which was converted to a hotel and is now a nursing home.

2. Planning Policy Wales Edition 12 requires that when identifying sites for convenience (and other) retail uses, **there is first a need to establish whether there is a need for additional retail provision** where the proposed site is outside defined retail and commercial centre boundaries.
3. The South-West Wales Regional **Retail Study** was prepared for Pembrokeshire and Ceredigion County Council and Pembrokeshire Coast National Park Authority in **February 2017** which is the **base date for Pembrokeshire County Council's LDP2**. The retail study **considers the period up to 2036** which is three years beyond the LDP2 Plan period. **Need for new convenience and comparison retail space was identified at a strategic level with the majority directed to Haverfordwest. Almost all resident catchment convenience expenditure is retained within the County of Pembrokeshire (including the National Park).** Tenby is the closest town with an identified retail centre which is approximately a mile and half away from the representation site. The retail report concludes that **the forecast need for Tenby over the study period can be accommodated through small-scale retail and mixed-use developments within or on the edge of centre.**
4. A Candidate Site was submitted for land including the representation site and additional land to the north, extending to the edge of Well Park Caravan site (reference **Candidate Site 154**). The Candidate Site submission asked for the site to be **considered for a variety of uses – namely housing, hospital expansion, hotel, food retail/pub. The conclusion was that the retail and commercial uses were not justified with no need established for this site.**
5. The representor regards the Retail Study as 'flawed' and out of date. They nonetheless rely on the same Study to support their case that additional retail space for Tenby is needed. This appears to be based on a leakage of expenditure from Tenby to other towns such as Pembroke Dock (approximately 11 miles to the west) and that this will undermine the National Park Authority's retail strategy for Tenby to maintain its position in the retail hierarchy relative to Saundersfoot. The representor has quoted from the Retail Study in relation to market demand for stores such as Aldi and Lidl for Key Centres and 'local' format foodstores (such as Sainsbury's Local, Tesco Express) within town centre locations. This is not however specific to Tenby but relates to 'key centres' throughout Pembrokeshire. **The National Park Authority published a draft Review Report for it's Local Development Plan 2 for public consultation in December 2024.** The Report advises that the retail policies of the Plan have been performing as intended. The Authority plans to review the extent of the 5 Retail Centre boundaries within the National Park planning area and give further consideration to identification of further Primary and Secondary Frontages, with particular reference to Saundersfoot. **There is, however, no concern raised about Tenby not maintaining its position in the retail hierarchy.**
6. Future Wales – The National Plan published by Welsh Government in February 2021 encourages the development of sustainable communities by directing new development to rural towns and villages which in turn can support their surrounding areas. Policy 6 (Town Centre First) of the Plan directs 'significant' retail facilities to town and city centres with good access by public transport. It broadly defines 'significant' as a facility to serve a town, city or region-wide catchment, although leaves the decision as to whether a proposal is of a 'significant scale' to the local planning authority. It is acknowledged in the supporting text of the Future Wales policy that a plan-led approach is the best way to identify the location for such facilities but where allocations are not made, a sequential approach must be used to determine

planning applications. Due process has been followed in getting the Local Development Plan to the Deposit Stage. Candidate Site 154 was considered at the appropriate stage and an allocation made in the Plan to cater for identified specialist and supported housing. The site has not been assessed for retail use, including the potential impact on the vitality or viability of retail centres within the Council's and National Park Authority's planning jurisdiction, as no need for additional retail space was identified.

7. The sequential test is set out in detail in Planning Policy Wales 12 (paragraphs 4.3.18 to 4.3.24) and requires sites within and at the edge of retail centres to be considered before out of centre locations. The extent of the sequential test should be agreed between the developer and the planning authority. The representation states that *"a sequential approach has been used to inform the identification of the best location for a new retail development for Tenby."* Reference is made to discussions with officers from Pembrokeshire County Council regarding the representation site being the most suitable, available and viable site to accommodate a new retail store to meet the needs of Tenby. No details of the search area have been provided.
8. The focus of the representation is Tenby. It is not known if sites in or adjacent to other settlements have been considered. The closest town with an identified town centre within the County Council's area is Narberth, approximately 9 miles to the north. The retail study does not forecast new retail floorspace need for Narberth. In addition, Kilgetty which is approximately 4 miles to the north of the site is identified as a Local Retail Centre.
9. Candidate Site 154 was supported in part for Specialist and Supported Accommodation for which there is an identified need. This is set out in the Assessment of Specialist Housing and Accommodation Need for Older People in West Wales Background Paper (November 2018). Quarter of a hectare of land within the Candidate Site 154 was allocated for a residential/nursing facility extension under Policy GN 23 (Specialist and Supported Accommodation Allocations) of the Plan (ref SS/089/LDP2/01 East of Park House, Tenby), along with an larger allocation to the south-west allocated for development of an extra care facility for older persons (Ref SSA/089/01). The allocation of two parcels of land in close proximity demonstrates the level of need. Both sites are adjacent to the existing care home facility at Park House. The representation suggests that allocation SS/089/LDP2/01 would compromise the effectiveness of LDP2 to meet the retail needs of the National Park and surrounds. There is identified need however for the residential/nursing home extension and providing for housing need is a priority for the County Council.
10. Amendment to Policy GN 32 Out-of-Centre Retail and Commercial Development is not considered necessary.
11. Reference is made in the representation to development of the Park House site for retail offering active travel opportunities between Tenby and New Hedges. Planning Policy Wales 12 (paragraphs 4.1.8 to 4.1.18) requires that active and sustainable travel is considered for all development.
12. No changes to the Plan are proposed as a result of these representations.

Recommendations		Focussed Change/Edit Ref
A.	No change is proposed to the Plan in response to this submission.	N/A

## 4.17 Pembroke & Pembroke Dock

Pembroke and Pembroke Dock: Is the spatial distribution of housing allocations in accordance with the Settlement Hierarchy?	
LDP and Other Document References	<ul style="list-style-type: none"> <li>i) SP 2 Housing Requirement</li> <li>ii) SP 6 Settlement Hierarchy – Urban Settlements</li> <li>iii) SP 7 Settlement Boundaries</li> <li>iv) SP 8 Regional Growth Areas and Urban Settlements</li> <li>v) GN 16 Residential Allocations</li> <li>vi) Appendix 2 Housing Components and Trajectory – Table A: Housing Supply.</li> <li>vii) Proposals Map Pembroke and Pembroke Dock</li> <li>viii) Housing Requirement Background Paper (2023)</li> <li>ix) Candidate Sites' Register and Site Assessment</li> <li>x) Joint Housing Land Availability Studies and Housing Assessments 2008/09-2022/23)</li> <li>xi) Pembrokeshire - Demographic Forecasts (July 2018)</li> <li>xii) Pembrokeshire – Updating the LDP Demographic Evidence (December 2020)</li> <li>xiii) Rural Facilities Background Paper (December 2020 with corrections July 2024)</li> <li>xiv) Urban Facilities Background Paper (September 2019 with corrections July 2024)</li> </ul>

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
Representations related to <b>South West of Southlands, St Daniels Hill, Pembroke HSG/095/LDP2/2</b> and <b>South East of Southlands, St Daniels Hill, Pembroke HSG/095/LDP2/5</b> in respect of policies <b>SP2 Housing Requirement, SP6 Settlement Hierarchy, SP 7 Settlement Boundaries, GN 16 Residential Allocations</b>		
<ul style="list-style-type: none"> <li>i. Object to allocating South West of Southlands, St Daniels Hill, Pembroke HSG/095/LDP2/2 and South East of Southlands, St Daniels Hill, Pembroke HSG/095/LDP2/5 on the basis that the housing requirement set out in Policy SP 2 is based on flawed assumptions.</li> <li>ii. <b>SP2 Housing Requirement:</b> The housing requirement (with the flexibility allowance included) is 6,425 dwellings over the Plan period based on the average of: <ul style="list-style-type: none"> <li>• WG 2018 based Long Term Population Projection which forecasts a need for 295 dwellings per annum;</li> <li>• Dwelling-led, 5 year average completion rate from 2014/15 to 2018/19 of 413 dwellings per annum;</li> <li>• Dwelling-led, 10 year average completion rate from 2009/10 to 2018/19 of 378 dwellings per annum.</li> </ul> </li> </ul>	2233/1 2233/2	<b>S &amp; F Walder and neighbours</b>

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
<p>iii. This information is taken from <b>Pembrokeshire Demographic Forecasts (July 2018) prepared by Edge Analytics</b>. The average figure is justified on the basis of a further population projection that took account of longer term migration trends (2001/02 – 2015/16) than those of the Welsh Government projections, which smooths out the 2014 population drop attributed to the closure of one of the refineries. This is considered to be a flawed argument, as net migration has not returned to the 2001-2008 levels. The Population Growth (PG) 10-year scenario of 3920 dwellings over the plan period is considered to be more appropriate, as it does not include the pre-2009 recession higher period of net migration.</p> <p>iv. As further justification for a lower housing target, the Council's paper titled Housing Requirement Background Paper 2023 states that a higher level of growth will promote a more balanced age demographic, due to more houses being available for young families to move into Pembrokeshire. This is considered to be a flawed assumption as there are numerous reasons why a family would move to the area. One critical factor would be suitable employment and as the Edge analytics report notes, the closure of one of the refineries in 2014 led to a drop in population in the subsequent year. Furthermore, the employment led scenarios in the report would result in dwelling growth of 191 and 182 dwellings per annum. This suggests the employment opportunities would not support the chosen growth option. It would also not promote a more balanced age demographic as a result because of the need for employment to encourage young families to move to the area.</p> <p>v. The housing target is also not supported by the Local Housing Market Assessment (2021), which states there is a need for 4083 dwellings over the Plan period. This would lead to an excess of 650 dwellings based on the LDP2 target</p> <p>vi. As a result of the above points there has been an oversupply of land allocated for housing and the LDP is therefore not appropriate and unsound in this regard.</p>		
<p>vii. Pembroke has been allocated a disproportionate level of houses in GN 16 Residential Allocations to make up for a deficit of sites at Pembroke Dock, which is identified as being above Pembroke in the settlement hierarchy due to the service provision calculated in the Urban Facilities Background Paper.</p> <p><b>Housing Supply in Pembroke and Pembroke Dock</b></p> <p>viii. Policy <b>SP6 Settlement Hierarchy</b> states that the settlement hierarchy has been defined on the basis of functional characteristics and availability of services and facilities,</p>	<p><b>2233/1</b> <b>2233/2</b></p>	<p><b>S &amp; F Walder and neighbours</b></p>

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
<p>(including sustainable transport), with respect also for the existing size and built character of a settlement. Paragraph 4.30 further states that the Settlement Strategy directs the greatest proportion of growth to those settlements with the most existing facilities and that development will therefore be proportional to the size of a settlement, its function and character, and based on current service provision.</p> <p>ix. <b>PCC's Urban Settlements Report (September 2019) (with minor updates July 2024)</b> ranked urban settlements according to the number and range of services within them. <b>Pembroke Dock and Pembroke were ranked 3 and 4 respectively.</b> Paragraph 4.39 of LDP 2 describes Pembroke Dock as "a key service, employment and retail centre in south Pembrokeshire." Paragraph 4.40 describes Pembroke as a historic town which will benefit from developments that further strengthen the conservation of its impressive built and natural heritage. Its importance as a tourist destination and retail and service offer are also noted. The only employment land allocated in LDP 2 for Pembroke is a small (0.5 hectare) site for mixed retail, commercial and community uses (MXU/095/LDP2/01). Whereas Pembroke Dock has been allocated 21.69 hectares of employment land.</p> <p>x. Under policy GN 16, Pembroke Dock has been allocated a total of 130 units within the plan period, whilst Pembroke has been allocated 285 units, which is more than double. However, Pembroke Dock has a significantly higher population than Pembroke (21%, or 2062 people). Effectively land in Pembroke is being used to meet the housing needs of Pembroke Dock.</p> <p>xi. In conclusion, Pembroke has been allocated a disproportionate amount of housing land compared to Pembroke Dock its nearest urban neighbour (more than double). This contradicts the settlement strategy which seeks to allocate housing land to those settlements with the most facilities, proportional to the size of the settlement and to reflect its function and character. Clearly Pembroke Dock is a more sustainable settlement than Pembroke in terms of its size, services, transport links and access to employment. As such, LDP 2 is not appropriate and is unsound in this regard. To overcome this issue there should be a review of housing sites in Pembroke and Pembroke Dock with a view to removing sites in Pembroke, including housing allocation sites HSG/095/LDP2/2 and HSG/095/LDP2/5, and increasing the provision of housing land in Pembroke Dock.</p>		
<p>xii. The burden of the housing requirement falling on Pembroke is excessive and contrary to, and will therefore fail to deliver, the Plan's housing strategy.</p>	<p>4336/1 4336/2 1744/2</p>	<p>Cllr J Grimes, Pembrokeshire County Council</p>



Summary of Issues		Raised By	Name (wish to speak at Examination in bold)
		1744/3	Pembroke Town Council
xiii.	There are obvious housing sites in Pembroke Dock (which supports greater infrastructure) that have not been considered ahead of allocating sites HSG/095/LDP2/2 and HSG/095/LDP2/5.	4336/1 4336/2 1744/2 1744/3	Cllr J Grimes, Pembrokeshire County Council Pembroke Town Council
xiv.	<b>Housing Supply in Pembroke and Pembroke Dock:</b> Pembroke has been allocated a disproportionate amount of housing land compared to Pembroke Dock its nearest urban neighbour (more than double). This contradicts the settlement strategy which seeks to allocate housing land to those settlements with the most facilities, proportional to the size of the settlement. Clearly Pembroke Dock is a more sustainable settlement than Pembroke in terms of its size, services, transport links and access to employment.	4383/1 4383/2	Cllr A Carey, Pembrokeshire County Council
xv.	As such LDP 2 is not appropriate and is unsound in this regard. To overcome this issue there should be a review of housing sites in Pembroke and Pembroke Dock with a view to removing sites in Pembroke, (including housing allocation sites HSG/095/LDP2/2 and HSG/095/LDP2/5) and increasing the provision of housing land in Pembroke Dock.		
xvi.	In preparing the LDP PCC has failed to properly assess potential housing land in line with the sequential tests in Planning Policy Wales paragraph 4.2.17. Alternative land that could have met the housing needs of Pembroke Dock was overlooked and instead higher quality farmland encroaching the countryside to the south of Pembroke (including the two sites adjacent to Southlands) has been allocated inappropriately.		
Representations related to <b>New Site 19</b> North of Pembroke Road and west of Ferry Lane, Pembroke Dock in respect of policy <b>GN 16 Residential Allocations</b>			
A new site covering 11.4ha is suggested north of Pembroke Road and west of Ferry Lane, Pembroke Dock, reference New Site 19. The submission outlines the suitability of the site in terms of its location between built form with housing to the north, the secondary school to the south and housing allocation reference HSG/096/00238 to the west. It outlines that it is located in closer proximity to services such as schools, the local hospital and employment opportunities when compared to allocations HSG/095/LDP2/2 South West of Southlands, St.Daniels Hill and HSG/095/LDP2/5 South East of Southlands, St.Daniels Hill in neighbouring Pembroke. It also has a lower Agricultural Land Classification (ALC) compared to these allocations.		2233/1	<b>S &amp; F Walder and neighbours</b>
Representations related to <b>Candidate Site number 074 Land at Upper Sycamore Woods (Upper Site) Pembroke Dock</b> in respect of policy <b>GN 16 Residential Allocations</b>			
Object on the basis that no allocations for Pembroke Dock have been identified as being deliverable in the short term and no small sites have been identified to allow for delivery in the short term. Candidate site		2007/5	<b>Celtic Homes Ltd</b>



Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
074 could provide delivery of houses in this time-period and provide a wider range of site sizes to assist with the delivery of Housing within Pembroke Dock.		

Response
<p><b>Policy SP 2 Housing Requirements</b> and evidence base papers <b>Housing Requirement Background Paper (2023)</b>, <b>Pembrokeshire - Demographic Forecasts (July 2018)</b> and <b>Pembrokeshire – Updating the LDP Demographic Evidence (December 2020)</b></p> <ol style="list-style-type: none"> <li>1. The <b>Preferred Strategy</b> included provision for 7,820 dwellings over the Plan period to enable delivery of 6,800 dwellings, equivalent to 425 per annum, which was carried forward to the Deposit Plan 1 consultation, undertaken January-March 2020. This was a dwelling-led scenario from the growth scenarios including in the original paper by Edge Analytics, titled <b>Pembrokeshire - Demographic Forecasts (July 2018)</b>.</li> <li>2. The <b>Housing Requirement Background Paper (2023)</b> (hereafter referred to as the 'background paper') refers to the Welsh Government's (WG) category B objection to the housing requirement, which was submitted during the Deposit Plan 1 consultation (January-March 2020). In summary it states <i>"The authority needs to explain why they are proposing growth significantly above the projections, the reliance and continuation of net in-migration and the relationship to economic growth levels. Evidence needs to demonstrate where in-migration will be derived from, i.e. neighbouring counties, elsewhere in Wales, the UK, or international migration, taking into account the likely effect of UK immigration policy."</i> It requests that the scenarios are updated using the 2018 mid-year population estimates.</li> <li>3. The Council commissioned Edge Analytics to produce an update titled <b>Pembrokeshire – Updating the LDP Demographic Evidence (December 2020)</b>. It showed that: <ol style="list-style-type: none"> <li>i. The 2018 based Welsh Government Principal Projection is higher than the 2014 based Principal Projection and reflects, in part, higher than anticipated in-migration figures to Pembrokeshire in 2015 and 2016. The 2018 principal projection has an annual net in-migration rate of 688, compared to 386 in the 2014 (rebased) projection. This also demonstrated that the 2014/15 year of low migration was a 'blip' and not a sustained drop.</li> <li>ii. The population change projected with the 2018 based figure is 4.9% in comparison with the 2.6% figure of 2014.</li> <li>iii. The WG 2018-based principal projection results in an annual need for 271 dwellings, in comparison with the WG 2014 principal projection, which projected an annual requirement for 184 dwellings per year.</li> <li>iv. The 2018 based growth scenarios have long term lower growth outcomes from natural change than the 2014 based projections due to the dampened fertility and mortality assumptions.</li> </ol> </li> <li>4. The background paper cites that since the Deposit Plan 1 and the updated report, the <b>Celtic Freeport</b> bid was successful in March 2023. This is now progressing, with elements of the legislation such as tax relief sites now in place. On this basis, the background paper considers that employment prospects have improved further, which would justify a higher level of housing growth compared to the net migration scenario.</li> </ol>

5. The background paper also considers the additional few years of annual dwelling completion figures from 2020/21, 2021/22 and 2022/23 taken from the **Joint Housing Land Availability Studies and Housing Assessments**, given that this provides more up to date figures on demand and supply within the new-build housing market since Deposit Plan 1 was prepared in early 2020. The background paper found that the rolling 10-year average was 378 dwellings per annum and the 5-year average was similar at 374.
6. For the reasons set out above, the preferred growth option is the average of the following three scenarios:
  - i. Population Growth (PG) Long Term projection - Uses ONS 2018 Mid-Year Estimates and migration assumptions from a 17-year 2001/02-2017/18 at 295 dwellings per annum.
  - ii. Dwelling-led (5-year average) - 413 dwellings per annum over the 5-year period 2014/15 to 2018/19.
  - iii. Dwelling-led (10-year average) - 378 dwellings per annum over the 10-year period 2009/10 to 2018/19.
7. The average comes out as 363, rounded to 365 dwellings per annum. This equates to 5,840 over the 16-year Plan period.
8. This preferred option:
  - i. Is considered to be deliverable, as the figure is similar to the 5 and 10 year average completion rates;
  - ii. It reflects longer term migration trends;
  - iii. It takes account of economic variances including the closure of a major employer in Pembrokeshire in 2014;
  - iv. It will assist in meeting the significant backlog of affordable housing need;
  - v. It will support the local building industry and wider economy;
  - vi. It will deliver a more balanced population profile than lower growth levels; and
  - vii. It scores more positively than higher levels of growth in terms of the Sustainability Appraisal as it provides more opportunities for protecting soil quality, minimising pollution and protecting water quality.
9. **Representor 2233** S & F Walder and neighbours considers that using the longer-term migration trends (2001/02 – 2015/16) is flawed as net migration has not returned to the 2001-2008 levels. For this reason, the Population Growth (PG) 10-year scenario of 3,920 dwellings over the Plan period is considered to be more appropriate, as it does not include the pre-2009 recession higher period of net migration.
10. Whilst the Local Planning Authority (LPA) agrees that migration has not returned to the pre-2009 recession levels, by using this longer time period from 2001-2016, the projection takes account of both low and higher migration levels.
11. Representor 2233, S & F Walder and neighbours, states that a higher level of growth promoting a more balanced age demographic is flawed on the basis that there are a number of reasons why families would move to an area, with one critical factor being employment. The closure of one refinery led to a significant drop in migration in 2014/15. Furthermore, the employment led scenarios would result in a growth requirement of 191 and 182 dwellings per annum.
12. Whilst acknowledging that there has been a refinery closure, the area has now been successful in its Celtic Freeport bid, which is now live. This includes the afore-mentioned refinery site and demonstrates that the Celtic Freeport should help to re-use employment land to sustain employment levels. The employment led scenario does not take into account the effect of

Freeport status in terms of the employment growth and associated housing growth that it should also offer. The Deposit Plan 2020 envisaged that the plan would provide for 2,200 jobs, whereas the Deposit Plan 2 (2024) has a target for 1,970 with an additional 1,000 jobs linked to Celtic Freeport within the Plan period. As a result, the employment scenario suggested by the representor was not used to establish the housing requirement.

13. In terms of the **Local Housing Market Assessment 2021**, representor 2233 S & F Walder and neighbours highlights that it states there is a need for 4083 dwellings. This would lead to an excess of 650 dwellings based on the LDP2 target.
14. In response, it is noted that these figures relate to need for all types of housing. The paper concludes that in all scenarios, there would be an un-met need in affordable housing specifically. By having a higher growth option, greater levels of much needed affordable housing will be possible compared to a lower growth option.
15. The LPA's chosen growth option is considered to be evidence based and sound. It is therefore not considered appropriate to reduce the housing requirement of policy SP2 or remove allocations such as South West of Southlands, St Daniels Hill, Pembroke HSG/095/LDP2/2 and South East of Southlands, St Daniels Hill, Pembroke HSG/095/LDP2/5.

**Policy SP6 Settlement Hierarchy** and **Policy GN 16 Residential Allocations** in respect of the spatial distribution of housing and the number of allocated units apportioned to Pembroke and Pembroke Dock

16. The spatial distribution of housing to meet the requirement set out in policy SP 2 (Housing Requirement) is informed by policy SP 6 Settlement Hierarchy. The position of the various settlements in the settlement hierarchy is explained by the Rural Facilities and Urban Facilities Background Papers. In the case of rural settlements, the Rural Facilities Background Paper in the first instance gathered information on the availability of twenty different service indicators and estimated the population within the settlement boundary for each settlement. The Rural Facilities paper then defined a grouping of settlements based on a minimum level of service provision and population for each position of the hierarchy. It does not distinguish between settlements within a given category. For urban settlements, the corresponding background paper ranks the eight settlements based on service provision and number of a given service. For example, all of the eight settlements have public houses. In this case they are ranked by number of public houses within the settlement boundary.
17. When analysing options for future growth, the complementarity services and proximity to other towns must also be acknowledged as set out in the Urban Facilities Paper. It cites Fishguard/Goodwick and Pembroke/Pembroke Dock as having shared services and proximity.
18. The spatial distribution of Policy GN 16 Residential Allocations takes into account:
  - i. the position of the settlement in the settlement hierarchy
  - ii. the choice, availability and suitability of candidate sites for development.
  - iii. The requirement for a 60:40 split (i.e. 60% of all housing in urban and 40% in rural areas) is also achieved. This is in the context of the housing supply as a whole (which also needs to consider that fact that completions since the base date of the Plan have had a greater rural emphasis and this needs to be offset).
19. Appendix 2: Housing Components and Trajectory, Table A Housing Supply of the Local Development Plan provides a summary of total housing allocation units number for each Urban Settlement in column D. It shows there is broad alignment with the ranking established by the

Urban Facilities Background Paper, with the exception of Goodwick and Fishguard, Pembroke and Pembroke Dock.

20. In the case of Pembroke Dock, all candidate sites that were considered to be suitable for development were allocated. If there had been further sites acceptable then they would have been allocated as well, because it is acknowledged that Pembroke Dock should have a higher quantity of housing development to reflect the higher level of service provision compared to Pembroke. As none were available, additional housing allocations were made in Pembroke. This decision was made because as stated by the Urban Facilities paper (paragraph 5.2), the towns share services and are in close proximity to one another. The additional housing allocations in Pembroke will therefore help support the expected employment growth in Pembroke Dock as a result of Freeport status. It is also worth noting that some Freeport Tax sites are located on the Angle peninsula, which is closer to Pembroke than Pembroke Dock.

### **Sites in Pembroke Dock**

21. **New Site 19 North of Pembroke Road and west of Ferry Lane and Candidate site 074 (Land at Upper Sycamore Woods (Upper Site))** have been submitted as part of representations, which are considered could address this imbalance in housing allocations between Pembroke and Pembroke Dock.
22. **New Site 19** North of Pembroke Road and west of Ferry Lane, Pembroke Dock– This site was not submitted as a candidate site during the calls for candidate sites in 2018 and 2019. The site's suitability has therefore not been assessed by the Local Planning Authority (LPA). Notwithstanding this point, this submission has been made by a third party, which does not own the land and there is no evidence within the submission to indicate if the landowner would be supportive of a residential allocation. The Development Plans Manual (March 2020) paragraph 3.47 requires LPAs to consider the deliverability of a site when deciding to allocate land for development.
23. In terms the suitability of **candidate site 074 (Land at Upper Sycamore Woods (Upper Site))** for residential development, the Pembroke Dock Housing Issues Paper concludes that the site assessment undertaken in 2019 is out of date and the site is suitable as a housing development. In light of the above recognition that if further candidate sites were deemed suitable then they could have been allocated in Pembroke Dock, it is recommended that the site is allocated for residential development. The Candidate Site Register and Site Assessment should also be amended to state that southern part of CS.074 would fall into category 'Green 3'
24. The southern part of Candidate site 074 covers an area of approximately 0.31 Hectares. At the Plan's standard urban density of 30 dwellings per hectare, this would equate to an estimated 9 units.
25. The additional allocation of candidate site 074 for housing in Pembroke Dock is insufficient in size to allow for a housing allocation in Pembroke to be removed, as it would only accommodate an estimated 9 units and all the Pembroke allocations exceed this unit number. It is therefore recommended that there should be no change to the housing allocations listed under policy GN 16 in respect of Pembroke.

Recommendations		Focussed Change/Edit Ref
A.	No change to Policy SP 2 Housing Requirement figure	N/A
B.	No change to Policy GN 16 Residential Allocations in relation to New Site 19 North of Pembroke Road and west of Ferry Lane, Pembroke Dock	N/A
C.	No change to Policy GN 16 Residential Allocations in relation to South West of Southlands, St Daniels Hill, Pembroke HSG/095/LDP2/2 and South East of Southlands, St Daniels Hill, Pembroke HSG/095/LDP2/5	N/A
D.	<p>Add the southern part of candidate site 074 (Land at Upper Sycamore Woods (Upper Site)) to the allocation list under policy GN 16 Housing Allocations.</p> <p><b><u>LDP2 Reference: HSG/096/LDP2/3</u></b></p> <p><b><u>Site Name: Land south of Sycamore Woods and west of Lavinia Drive</u></b></p> <p><b><u>Settlement: Pembroke Dock</u></b></p> <p><b><u>Minimum Units in the Plan Period: 9 dwellings</u></b></p> <p><b><u>Indicative Affordable Housing Requirement: Off-site contribution</u></b></p> <p><b><u>Delivery Timescale: MT</u></b></p> <p><b><u>Units Beyond The Plan Period: 0</u></b></p> <p><b><u>Area Ha: 0.31</u></b></p> <p><b><u>Potential For Self-Build Indicated By Site Promotor: Yes</u></b></p> <p>The corresponding Settlement Boundary on the Proposals Map for Pembroke Dock should also be amended to include the new allocation.</p>	<p>FC4.SP07.Pembroke Dock.01</p> <p>FC5.GN16.PembrokeDock.02 and</p>
E.	<p>A new entry should also be created in Appendix 2: Housing Components and Trajectory as follows:</p> <p>Settlement Tier: <b><u>Urban</u></b></p> <p>LDP2 Reference: <b><u>HSG/096/LDP2/3</u></b></p> <p>Site Name: <b><u>Land south of Sycamore Woods and west of Lavinia Drive,</u></b></p> <p>Settlement: <b><u>Pembroke Dock</u></b></p> <p>Total Units to be delivered in Plan period: <b><u>9</u></b></p> <p>Time period for pre-application discussion/PAC consultation: <b><u>2026</u></b></p> <p>Time period for submission of planning application and determination: <b><u>2026</u></b></p> <p>Time period for the discharge of relevant conditions to enable site construction: <b><u>2027</u></b></p> <p>Number of units complete: <b><u>N/A</u></b></p> <p>Number of units UC: <b><u>N/A</u></b></p> <p>2027-28: <b><u>4</u></b></p> <p>2028-29: <b><u>5</u></b></p>	FC6.App2.PembrokeDock.02
F.	Amend the entry for the southern part of CS.074 (Land at Upper Sycamore Woods (Upper Site)) in the Candidate Site Register and Site Assessment to 'Green 4'	OE19
G.	As a consequential amendment remove hard rock safeguarding (Policy GN 38 Safeguarding and Prior Mineral	ME17

Recommendations		Focussed Change/Edit Ref
	Extraction) from the southern part of candidate site 074 (Land at Upper Sycamore Woods (Upper Site)) which is being allocated for housing development.	

## 4.18 Pembroke Dock Housing

### Are the Pembroke Dock housing allocations and commitments appropriate for the life of the Plan?

<b>LDP and Other Document References</b>	<ul style="list-style-type: none"> <li>i) SP 2 Housing Requirement</li> <li>ii) SP 6 Settlement Hierarchy</li> <li>iii) SP 7 Settlement Boundaries</li> <li>iv) SP 8 Regional Growth Areas and Urban Settlements</li> <li>v) GN 16 Residential Development</li> <li>vi) GN 17 Residential Commitments</li> <li>vii) GN 48 Green Wedges</li> <li>viii) GN 52 Protection of Open Spaces with Amenity Value</li> <li>ix) Deposit Plan Appendix 2: Housing Components and Trajectory</li> <li>x) Proposals Map Pembroke Dock</li> <li>xi) Candidate Sites' Register and Site Assessment</li> <li>xii) Housing Land Availability Studies and Housing Delivery Assessments (LDP1 Annual Monitoring Reports)</li> <li>xiii) Background Paper Housing Requirement 2023</li> <li>xiv) Open Space Assessment Background Paper (December 2019)</li> </ul>
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Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
Representations related to <b>SP 2 Housing Requirement</b> in respect of Pembroke Dock		
Object to the 10% flexibility allowance on the basis that other local planning authorities that have been through examination have been asked by inspectors to increase the allowance, which is contrary to the statement in the Deposit Plan 2 that the 10% allowance was considered appropriate elsewhere within Wales. This refers specifically to Swansea and Bridgend, who were asked to raise their 10% allowance to 13.3 and 14% respectively. In addition, Pembroke County Council has a historic rate of poor housing delivery. For these reasons, a 20% flexibility allowance should be considered.	<b>2007/2</b>	<b>Celtic Homes Ltd</b>
Representations related to <b>SP 6 Settlement Hierarchy and SP 8 Regional Growth Areas and Urban Settlements</b> in respect of Pembroke Dock		
Support Pembroke Dock's identification as an Urban Settlement and being one of four towns identified as a Regional Growth settlement in policy SP 6.	<b>2007/3</b> 4416/4	<b>Celtic Homes Ltd</b> Gethin Beynon Planning



Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
Representations related to <b>GN 16 Residential Allocations</b>		
Representations related to <b>North of Pembroke Road, Pembroke Dock HSG/096/00238</b> and associated open space allocation <b>OSP/096/LDP2/06</b>		
A water supply can be provided for HSG/096/00238. The local foul water network and Pembroke Dock Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed development site.	2603/34	Dŵr Cymru
Request to add 0.29ha to the housing allocation to align with contour line 46 metres above sea level and maximise the development potential of the site, based on the 2 metre contour lines rather than the 5 metre contour line that has been used. This would remove 0.29ha from OSP/096/LDP2/06, which is allocated as amenity open space.  The identification of the remainder of OSP/096/LDP2/06 to form green infrastructure in place of agricultural use is supported.	PCC Property Department/2	PCC Property Department
Representations related to <b>Land at Hampshire Drive, Pembroke Dock HSG/096/LDP2/1</b>		
A water supply can be provided for HSG/096/LDP2/1. The local foul water network and Pembroke Dock Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed development site. The site is crossed by 100mm & 150mm diameter sewers, which will require easement buffers.	2603/35	Dŵr Cymru
Representations related to <b>West of Stranraer Road, Pennar, Pembroke Dock HSG/096/LDP2/2</b>		
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. The findings of the HMA would inform the extent of any necessary upgrades. The local foul water network and Pembroke Dock Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed development site. The site is crossed by a 300mm diameter pressurised rising main sewer, which will require an easement buffer.	2603/36	Dŵr Cymru
Support the site being allocated as this will contribute towards Pembroke Dock's contribution to the housing supply. It is noted that the allocated housing for Pembroke Dock is 130 units and the neighbouring settlement Pembroke is 285 units. This strengthens how essential it is to deliver this housing allocation (HSG/096/LDP2/2) based on the Pembroke Dock settlement having a larger	4416/5	Gethin Beynon Planning

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
population and more community facilities compared to Pembroke.		
Representations related to <b>Candidate Site number 074 Land at Upper Sycamore Woods (Upper Site) Pembroke Dock</b> in respect of the <b>Candidate Sites' Register and Site Assessment and Policy SP 12 Maintaining and Enhancing the Natural Environment</b>		
Support the assessment of the northern part of Candidate Site 074 being given category 'Green 3', which reflects planning permission 19/1267/PA for a single dwelling that is under construction at the time of writing.	2007/8	Celtic Homes Ltd
Object to the conclusion of Candidate Site 074 as Red 4. The site is visually well-contained and makes no contribution to the wider countryside setting. Through discussions with the Council it has emerged that the Landscape Officer initially supported the site which was later changed to an objection without evidence.	2007/9	Celtic Homes Ltd
Object to the southern part of Candidate Site 074 being categorised as Red 4 as a result of comments from the Ecology Officer. No ecology issues were raised through the planning application process (refs 19/1267/PA and 20/0085/PA). An ecology survey was undertaken by Soltys Brewster Ecology in December 2024 which concluded that the site has been cleared. Satellite imagery shows regular disturbance since 2006. The conclusion that it provides a green corridor for protected species is therefore disputed. Vegetation around the site boundaries will be retained and enhanced. The Soltys Brewster Ecology report did not recommend any further surveys. Development of the land will result in a positive contribution to the objectives of Policy SP 12.	2007/10 2007/4	Celtic Homes Ltd
Representations related to <b>Candidate Site number 074 Land at Upper Sycamore Woods (Upper Site) and 075 Land at Upper Sycamore Woods (Lower Site), Pembroke Dock</b> in respect of the <b>Candidate Sites' Register and Site Assessment</b> and policy <b>GN 52 Protection of Open Spaces with Amenity Value</b>		
Object to the southern part of candidate site 074 being identified as amenity open space (reference OSP/096/LDP2/10) and being subject to the requirements of policy GN 52. The designation is not supported by an amenity space assessment, which would assess it's suitability as amenity open space. In the absence of any assessment, this designation is not based on robust, proportionate and credible evidence, therefore failing to meet the Test 2 of the tests of soundness set out within the	2007/7	Celtic Homes Ltd

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
Development Plan Manual, rendering the Proposals Map unsound.		
Support candidate site 075 being identified as amenity open space.	2007/7	Celtic Homes Ltd
<b>Representations related to Candidate Site number 074 Land at Upper Sycamore Woods (Upper Site) Pembroke Dock in respect of the time period for the Replacement Local Development Plan (LDP2) from 2017 to 2033</b>		
Objection to the time period of the plan only leaving 8 years (at the time of writing) for the plan to be in force. We have significant concerns regarding the LDP Deposit 2 plan period (2017-2033) which, at present, has just over 8 years remaining. This is wholly insufficient and fails to adopt a proactive approach to plan-making. We consider that the current plan period will result in the LDP being ineffective and therefore failing to meet Test 3 set out within the Development Plan Manual. We strongly recommend that the plan-period is extended by a minimum of 8 years (until 2041) to ensure it represents a robust and up to date Local Development Plan on adoption that provides a sound basis for future decision-making. Extending the plan period would require the allocation of additional housing sites to ensure the consistent supply of homes throughout the Plan period. It is in this regard that Celtic Homes Ltd support Candidate Site 074 for inclusion as an allocated site.	2007/1	Celtic Homes Ltd
<b>Representations related to Candidate Site number 074 Land at Upper Sycamore Woods (Upper Site) Pembroke Dock in respect of policy GN 17 Residential Commitments</b>		
Object to all but one of the housing commitments for Pembroke Dock being included in the housing land supply in the medium and long term Plan periods. This fails to meet the advice of Development Plans Manual, which states that "housing trajectories should include a steady flow of housing sites through the Plan period, and not be unduly loaded towards the end of the Plan period".	2007/6	Celtic Homes Ltd
<b>Representations related to open space designation OSP/096/LDP2/06</b>		
Request for the southwestern corner of OSP/096/LDP2/06 to be removed from the open space designation, on the basis that this section is not visually pleasing or of any great benefit to the local community. This would allow for a small windfall housing development of potentially 2 dwellings.	PCC Property Department/3	PCC Property Department

## Response

1. **SP 2 Housing Requirement in respect of Pembroke Dock:** Deposit Plan SP 2 Pembroke Dock – 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; and as advised 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 greater flexibility allowance. In any case, Appendix 2B and 2C of the Local Development Plan 2 Deposit 2 identifies units beyond the plan period 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 under-estimation then this is a further flexibility allowance. Each local planning authority area has specific circumstances that culminate in different outcomes for their LDPs, so it would not be appropriate to increase the flexibility allowance based on the outcome of examination of other LDPs. The reference in the executive summary was intended to refer to the Welsh Government Development Plans Manual (2020). In terms of the local circumstances in Pembrokeshire, LDP1 adopted 28<sup>th</sup> February 2013 has under-delivered 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 Assessment and 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.
2. **SP 6 Settlement Hierarchy in respect of Pembroke Dock:** Deposit Plan SP 6 Pembroke Dock – Support for Pembroke Dock being identified as a Regional Growth Area within the Urban Settlement tier welcomed.
3. **SP 8 Regional Growth Areas and Urban Settlements in respect of Pembroke Dock:** Deposit Plan SP 8 Pembroke Dock – Support for Pembroke Dock being identified as a Regional Growth Area within the Urban Settlement tier is welcomed.
4. **North of Pembroke Road, Pembroke Dock HSG/096/00238:** Deposit Plan GN 16 Residential Allocations HSG/096/00238 – Dŵr Cymru comments noted.
5. **North of Pembroke Road, Pembroke Dock HSG/096/00238:** Request to increase this housing allocation by 0.29Ha and remove the equivalent from **OSP/096/LDP2/06** – The combined area of HSG/096/00238 and OSP/096/LDP2/06 totalling 2.81ha is all allocated for housing in LDP1 adopted 28<sup>th</sup> February 2013. When the site was considered for continued allocation in the replacement LDP2, it was identified that the southern portion of the site had steep topography that made it unsuitable for development, as it would be costly to engineer a solution. During this time, the Open Space Assessment Background Paper (December 2019) also highlighted that OSP/096/25 to the west and OSP/096/LDP2/05 to the east formed a fractured green corridor linking Cosheston Pill to Pennar Point. It was therefore decided that the southern portion of the site covering 1.32Ha should be allocated as amenity open space to become green infrastructure and bridge some of the gap between the afore-mentioned designated areas of open space. The remainder of the site totalling 1.52Ha was allocated for housing in Local Development Plan 2, using the 5 metre interval contour lines. The representation presents a 2-metre interval contour map which if followed in terms of defining the extent of the housing allocation would better reflect the original intended approach. Planning Policy Wales 12 requires Local Planning

Authorities to make best use of sustainable locations adjacent to the existing settlement boundaries, particularly in urban areas. As the site is currently an agricultural field with no open space/green infrastructure value, this change to remove 0.29Ha from the proposed Open Space designation and inclusion within the housing allocation would be acceptable. For these reasons, a focussed change is recommended to remove 0.29Ha from OSP/096/25 and add it to HSG/096/00238.

6. **Land at Hampshire Drive, Pembroke Dock:** Deposit Plan GN 16 Residential Allocations HSG/096/LDP2/1– Dŵr Cymru comments noted.
7. **West of Stranraer Road, Pennar, Pembroke Dock:** Deposit Plan GN 16 Residential Allocations HSG/096/LDP2/2– Dŵr Cymru comments noted.
8. Deposit Plan GN 16 Residential Allocations HSG/096/LDP2/2– Support for the site's' allocation is welcomed.
9. **Candidate Site (CS) number 074 Land at Upper Sycamore Woods (Upper Site) Pembroke Dock:** Candidate Sites' Register and Site Assessment CS.074 – Support for the assessment of the northern part of the site is welcomed.
10. Candidate Sites' Register and Site Assessment CS.074 – Objection in respect of the southern part of the site and the Ecology Assessment. The Council's Planning Ecologist reviewed the candidate site in October 2019 and concluded that the southern part of the site formed part of a green corridor for protected species, ahead of the first LDP2 Deposit Plan consultation in winter 2019/20. On 13/05/2020 planning application reference 20/0085/PA was submitted, seeking planning permission for the 'Construction of a stable block and menage together with associated works.' Planning permission was granted 20/11/2020, following no objection from the Planning Ecologist. The representation contains an Ecology Summary Note (Dec 2024), showing that at the time of the walkover survey in December 2024, the southern part of CS.074 was being grazed by goats leaving minimal vegetation within the interior of the site. The Council's Planning Ecologist has reviewed the representation and considered the aforementioned planning permission. They agree that fenced area has been cleared by the grazing goats, leaving bracken as the only vegetation remaining. They note that there are still trees on top of the bank along the northern boundary and they do form a green corridor, but this does not connect to anything else to the north. On this basis they no longer object to the principle of development, subject to northern tree corridor being retained. They would also want to ensure that the woodland to the west that is located largely within neighbouring candidate site 075 (Land at Upper Sycamore Woods (Lower Site), remains dark.
11. Candidate Sites' Register and Site Assessment CS.074 – Objection in respect of the southern part of the site and the Landscape assessment. The Council's Landscape Officer initially reviewed candidate sites in the Spring of 2019. For Candidate Site 074, the outcome was 'Support, subject to quality controls'. A meeting was held in October 2019 with the Landscape and Ecology Officers present. Following the Ecology Officer's conclusion in point 10 above, the Landscape Officer revised the response to 'Object, due to Design Issues'. The officer has reviewed the information submitted as part of the representation and has concluded that the outcome for the Candidate Site assessment should revert back to 'Support, subject to quality controls'. The officer notes that there are some mature trees in the remnant hedgerow that would be good to retain if possible and also agrees with the Planning Ecologist that the woodland to the west that is located largely within neighbouring candidate site 075 (Land at Upper Sycamore Woods (Lower Site), should remain unbroken. See Pembroke and Pembroke Dock Issues Paper for consideration of the site's consideration for allocation for residential development.

12. **GN 52 Protection of Open Spaces with Amenity Value - OSP/096/LDP2/10:** Candidate Sites' Register and Site Assessment Candidate Site 074 Land at Upper Sycamore Woods (Upper Site) – Objection to the southern part of Candidate Site 074 being designated amenity open space due to lack of an amenity space assessment. The Deposit Plan 2 is supported by a background paper Open Space Assessment Background Paper (December 2019). This paper sets out a methodology that provides a sound framework for identifying both amenity and recreational open space. In terms of OSP/096/LDP2/10, in alignment with the methodology, it was designated as amenity open space, based on the conclusions of the Ecology and Landscape Officers conclusion in October 2019. In point 10 and 11 above, both officers no longer consider the site to be of ecological and landscape value. On this basis, the southern part of Candidate Site 074 no longer conforms with the methodology for identifying open space and should be removed from designation reference OSP/096/LDP2/10.
13. Candidate Sites' Register and Site Assessment CS.075 Land at Upper Sycamore Woods (Lower Site) – Support for the candidate site being designated as amenity open space welcomed.
14. The time period for the **Replacement Local Development Plan (LDP2) from 2017 to 2033** – Welsh Government Planning Policy Division has advised that should the Local Planning Authority seek to extend the time period of the plan, this would require a new Preferred Strategy and all subsequent stages to be repeated, which would further delay the preparation of the replacement LDP2. As the adopted Local Development Plan has already exceeded its operational life by 3 years at the time of writing, any further delay in its replacement could further risk the plan led decision-making process, as the adopted LDP becomes further out of date and further out of alignment with national policy. Due to this risk, it is considered on balance that continuing with current review timeline is the preferential option, despite the short time period following adoption.
15. **No Housing Allocations being identified for delivery under the Short Term timescale of the Plan. Also, no small sites are allocated in respect of Pembroke Dock:** Deposit Plan GN 16 Residential Allocations – Sites that can be allocated in the Plan period remaining, i.e. from 2023 to 2033 that are 5 or more units in size are shown in GN 16 Residential Development. Sites that can accommodate less than 5 dwellings are regarded as small windfall developments. The short-term period of the Plan covers years 1 to 5, which corresponded with the years 2017/18 to 2021/22. The Housing Land Supply has an updated base date corresponding with the year 2022/23. It is therefore not possible to identify a housing allocation (which would be for 5 or more dwellings) for delivery in the 'Short Term', as this period has already passed. The period 2017 to 2023 can be accounted for by sites of 5 or more units completed (both allocations and larger windfalls) along with windfall site completions for sites of less than 5. These amount to 70 units and which can be discounted from the overall housing requirement.
16. In terms of the medium term and long-term time periods the following supply has been identified. Three sites have been allocated for development. In the medium term, they would collectively deliver 15 units, whilst in the long term they would deliver 115 units. Land with planning permission accounts for 83 units, with a further 40 units under construction as at 2022/2023. Windfall sites can also come forward both for + 5 sites and under 5 proposals. Some possible opportunities are shown in the Candidate Site Register.
17. **No Residential Commitment being identified as short-term delivery in respect of Pembroke Dock:** Deposit Plan GN 17 Residential Commitments – The short-term Plan period



covers years 1 to 5, which corresponds with the years 2017/18 to 2021/22 and the Housing Land Supply has a base date corresponding with the year 2022/23. It is therefore not possible to identify a housing commitment for delivery in the short term, as this period has already passed. Any unit delivered in this part of the Plan period will have been counted as either completed or under construction in columns A and B of Appendix 2: Housing Components and Trajectory, Table A: Housing Supply. In Pembroke Dock, 70 units have been completed and a further 40 units were under construction.

18. **GN 52 Protection of Open Spaces with Amenity Value - OSP/096/LDP2/06:** Request is to remove the southwestern corner to allow for a 2-dwelling windfall development. In Local Development Plan 1 adopted 28<sup>th</sup> February 2013, a larger area measuring 2.9Ha is designated as OSP/096/28, which extends to the edge of Queen Street to the south. Planning permission reference 15/0947/PA granted 18/12/2015 allowed for the development of 3 affordable dwellings fronting Queen Street. The delegated report concluded that the social benefit of the dwellings being affordable satisfied the requirements of the existing amenity open space policy. Therefore, the loss of amenity open space was considered to be justified. It was also noted that an area of the open space would remain accessible to the public. Deposit Plan 2 is supported by the Open Space Assessment Background Paper (December 2019). It recognises that the area covered by planning permission 15/0947/PA no longer met the requirements for the whole site to be designated amenity open space, as per the methodology set out in the assessment. The remaining area covering 0.23Ha was still considered to satisfy the requirements for it to be designated as open space and was designated as OSP/096/LDP2/06 in Local Development Plan 2. No change in approach is considered necessary. This area of land was also submitted by a third party as Candidate Site 447 (East of King Street) for consideration as open space.

Recommendations		Focussed Change/Edit Ref
A.	No change to the flexibility allowance of the housing target specified by policy SP 2 Housing Requirement.	No change
B.	Add 0.29Ha to GN 16 Residential Allocations LDP2 Reference HSG/096/00238 North of Pembroke Road. Add 7 Units beyond the Plan Period. Amend Appendix 2 Housing Components and Trajectory to show 7 units beyond the plan period.	FC5.GN16.PembrokeDock.01 and <b>FC6.App2.PembrokeDock.01</b>
C.	Remove 0.29Ha from GN 52 Protection of Open Spaces with Amenity Value Reference OSP/096/LDP2/06 Land north of Pembroke Road.	FC5.GN52.PembrokeDock.01
D.	No change to GN 16 Residential Allocations LDP2 Reference HSG/096/LDP2/1 Land at Hampshire Drive.	No change
E.	No change to GN 16 Residential Allocations LDP2 Reference HSG/096/LDP2/2 West of Stranraer Road.	No change
F.	No change to Candidate Sites' Register and Site Assessment in relation to Pembroke Dock and the northern part of candidate site 074 Land at Sycamore Woods (Upper Site).	No change
G.	Amendment to northeastern section of OSP/096/LDP2/10 designated under Policy GN 52 Protection of Open Spaces with Amenity Value (Pembroke Dock). The 0.31Ha area covered by the southern section of Candidate Site .074 should be removed from designation reference OSP/096/LDP2/10 Land at Sykemoor.	FC5.GN52.PembrokeDock.02



H.	No change to the time period for the Replacement Local Development Plan (LDP2).	No change
I.	No change to GN 17 Residential Commitments.	No change
J.	No change to GN52 Protection of Open Spaces with Amenity Value in relation to OSP/096/LDP2/06 Land at Gravel Lane.	No change

## 4.19 Pembroke Dock Other

### Pembroke Dock Non-Residential Allocations and Designations – is the Plan setting out an appropriate framework for considering proposals coming forward?

#### LDP and Other Document References

- i) SP 6 Settlement Hierarchy
- ii) SP 8 Regional Growth Areas and Urban Settlements
- iii) SP 13 Port and Energy Related Development and Celtic Freeport
- iv) SP 14 Strategic Employment Provision
- v) SP 15 Safeguarding of existing Strategic Employment Sites
- vi) Interactive Proposals Map
- vii) Candidate Sites Register

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
Representations related in <b>SP 6 Settlement Hierarchy</b> in respect of <b>Pembroke Dock</b>		
Support Pembroke Dock's identification as an Urban Settlement and being one of four towns identified as a Regional Growth settlement in policy SP 6.	2007/3	Celtic Homes Ltd
Representations related to <b>SP 8 Regional Growth Areas and Urban Settlements</b> in respect of Pembroke Dock		
Support Pembroke Dock's identification as an Urban settlement and being one of four towns identified as a Regional Growth settlement in policy SP 8.	4416/4	Gethin Beynon Planning
Representations related to <b>SP 13 Port and Energy Related Development and Celtic Freeport</b>		
Support the policy including port locations, namely, Pembroke Port. This will support the energy related uses both at present and in the future.	4428/7	Port of Milford Haven
Representations related to <b>SP 14 Strategic Employment Provision</b> in respect of <b>Pembrokeshire Science and Technology Park Cluster S/EMP/096/00001</b>		
The site is crossed by a 110mm, 160mm and 600mm diameter watermain. No sewers crossing the site. Site is in the catchment area of Pembroke Dock WwTW.	2603/91	Dŵr Cymru
Representations related to <b>SP 15 Safeguarding of existing Strategic Employment Sites</b> in respect of <b>Pembroke Dock cluster (Royal Dockyard) S/EMP/096/00002</b>		
Support this site being safeguarded for employment uses by the policy and this would allow for potential	4428/8	Port of Milford Haven

redevelopment of the site, whilst recognising the existing employment use within the Port.		
Representations related to <b>Waterloo &amp; London Road Pembroke Dock Cluster S/EMP/096/C2</b> , namely, <b>Ferry Lane S/EMP/096/00004</b> , <b>Kingswood S/EMP/096/00005</b> and <b>Waterloo &amp; London Road S/EMP/096/00006</b>		
Where there is an adverse impact on the operation of the railway, Network Rail will require appropriate mitigation measures to be delivered as part of the planning application process. Developers should be more specific in assessing the risk to level crossings and should be fully assessed using an appropriate method included within a transport statement to support their application.	1545/5	Network Rail
Representations related to <b>Waterloo &amp; London Road Pembroke Dock Cluster (Kingswood) S/EMP/096/00005</b>		
<p>Request for the policy to include a wider range of economic uses, to include food retail (Use Class A1) in line with Planning Policy Wales.</p> <p>Alternatively, or additionally, wording should be included within Policy SP15 (as identified to be the intention in Paragraph 4.95), in line with the approach in Preferred Strategy Policy SP13 and Deposit Version Policy SP14, which allows for flexibility in uses and to recognise the role of complimentary and non-traditional (Class B) employment uses within the allocations.</p> <p>These requests are made to enable the delivery of an A1 Food store to be operated by Lidl GB Ltd.</p> <p>To note, the interactive proposal map calls the site 'London Road and Ferry Lane Pembroke Dock cluster (Kingswood)' whilst the policy text refers to it as 'Waterloo &amp; London Road Pembroke Dock cluster (Kingswood)'. Consistent wording and referencing should be used for clarity.</p>	4390/1	Lidl GB Ltd

## Response

- SP 6 Settlement Hierarchy in respect of Pembroke Dock:** Deposit Plan SP 6 Pembroke Dock – Support for Pembroke Dock being identified as a Regional Growth Area within the Urban Settlement tier is welcomed.
- SP 8 Regional Growth Areas and Urban Settlements in respect of Pembroke Dock:** Deposit Plan SP 8 Pembroke Dock – Support for Pembroke Dock being identified as a Regional Growth Area within the Urban Settlement tier is welcomed.

3. **SP 13 Port and Energy Related Development and Celtic Freeport:** Support for the policy including Pembroke Port is welcomed.
4. **SP 14 Strategic Employment Provision: Pembrokeshire Science and Technology Park Cluster S/EMP/096/00001** - Dŵr Cymru comments noted.
5. **SP 15 Safeguarding of existing Strategic Employment Sites: Pembroke Dock cluster (Royal Dockyard) S/EMP/096/00002** - Support for the sites inclusion within the policy is welcomed.
6. **Waterloo & London Road Pembroke Dock Cluster S/EMP/096/C2**, namely, **Ferry Lane S/EMP/096/00004**, **Kingswood S/EMP/096/00005** and **Waterloo & London Road S/EMP/096/00006** – Requirement to assess the risk at railway level crossings. No details have been provided regarding the location of the level crossing, although the nearest appears to be the road known as Llanion Cottages approximately 200 metres to the west of the nearest of the 3 sites listed above. This is a limited access crossing serving 3 residential properties and a pedestrian route known as Birdcage Walk, which links Llanion Cottages with Ferry Lane (A4139), Hamilton Court and a pedestrian tunnel under the railway, adjacent to Ferry Lane (A4139). It should be noted that the A4139 Ferry Lane and associated pedestrian route pass under the railway via a bridge and tunnel under the railway immediately adjacent to the safeguarded employment sites. Whilst the Council ensures the risk of level crossings and mitigation is identified, it is considered that any vehicle and pedestrian movements would utilise the adjacent tunnels under the railway, rather than use the Llanion Cottages level crossing further away, particular as the latter has a limited access route to it and does not support vehicle through traffic. No change is recommended in relation to the aforementioned sites, however, representation reference 1545/1 considers the wider policy approach.
7. **Waterloo & London Road Pembroke Dock Cluster (Kingswood) S/EMP/096/00005** - Request for policy changes to SP 15 Safeguarding of existing Strategic Employment Sites, to enable to delivery of an A1 Food Store to be operated by Libl GB Ltd.
  - I. The proposed site is situated within the settlement boundary for Pembroke Dock, to the south of the A477 trunk road, which serves as the main route to settlements on the southern side of the Cleddau Estuary, as well as serving the town centre and port via the A4139. The land also forms part of a Safeguarded Strategic Employment Site.
  - II. Planning Policy Wales requires that when identifying sites for convenience (and other) retail uses, **there is first a need to establish whether there is a need for additional retail provision** where the proposed site is outside defined retail and commercial centre boundaries.
  - III. The South-West Wales Regional **Retail Study** was prepared for Pembrokeshire and Ceredigion County Council and Pembrokeshire Coast National Park Authority in **February 2017** which is the **base date for Pembrokeshire County Council's LDP2**. The retail study **considers the period up to 2036** which is three years beyond the LDP2 Plan period. **Need for new convenience and comparison retail space was identified at a strategic level with the majority directed to Haverfordwest. Almost all resident catchment convenience expenditure is retained within the County of Pembrokeshire (including the National Park).** The site is located within Pembroke Dock settlement boundary and is approximately 1.1km from the defined town centre

boundary. The retail report concludes that **there is no forecasted need for convenience floorspace in Pembroke Dock over the study period.**

- IV. A Candidate Site was submitted for land, named Land at Kingswood, south of London Road (reference **Candidate Site 342**). The Candidate Site submission asked for the site to be **considered for Mixed Use**, namely, **Provision for Non-B Class Uses, including retailing, food and drink and a care facility**. The **Site Assessment** summarised that the **'Two County Economic Study concluded that the site should be part of Pembroke Dock Employment cluster to facilitate economic growth. In addition, there is no evidence provided to support retail and commercial uses. The site is not suitable for a care facility.'**
- V. Following this conclusion, the site was included within the **Waterloo & London Road Pembroke Dock** reference **S/EMP/096/C2** as part of **Kingswood** reference **S/EMP/096/00005**, which is listed under policy **SP 15 Safeguarding of existing Strategic Employment Sites**. The policy safeguards existing employment sites to ensure that the locations identified by the policy remain within employment use, should any part of the site become vacant, due to their significance to the local, regional and national economy.
- VI. The representation requests for the policy to include a wider range of economic uses, to include food retail (Use Class A1) in line with **Planning Policy Wales**. The sequential test for retail development is set out in detail in Planning Policy Wales 12 (paragraphs 4.3.18 to 4.3.24) and requires sites within and at the edge of retail centres to be considered before out of centre locations. The extent of the sequential test should be agreed between the developer and the planning authority. **No sequential test has been provided** as part of the representation. **The request to amend the policy in line with PPW is therefore not possible to assess.**
- VII. **The alternative request** made by the representation **was for wording included in policy SP 14 Strategic Employment Provision** to be included within SP 15 Safeguarding of existing Strategic Employment Sites. Policy SP 14 includes the following within the policy text: *'Because of the significance of these sites to the local, regional and national economy, their release for non-employment uses will only be permitted a) where closely related to the main employment use or b) in exceptional circumstances.'* Policy SP 15 includes similar text in the reasoned justification paragraph 4.93. As the strategic aims of these two policies are closely linked, it would be appropriate to include the quoted text in italics above as policy text for SP 15.
- VIII. **In terms of inconsistent naming of the sites** within employment cluster reference **S/EMP/096/C2** between the **Interactive Proposal Map** and the **Policy Text Document**, whilst regrettable, the **interactive version of the Proposal Map is intended to be a more user-friendly version of the Proposal Map**. The **printed version should be seen as the definitive version associated with the policy text document**. The employment cluster name is therefore **Waterloo & London Road Pembroke Dock S/EMP/096/C2**.

Recommendations		Focussed Change/Edit Ref
A.	No change to SP 6 Settlement Hierarchy in respect of Milford Haven	No change

B.	No change to SP 8 Regional Growth Areas and Urban Settlements in respect of Milford Haven	No change
C.	No change to SP 13 Port and Energy Related Development and Celtic Freeport in respect of Pembroke Port	No change
D.	No change to SP 14 Strategic Employment Provision in respect of Pembrokeshire Science and Technology Park Cluster S/EMP/096/00001	No change
E.	No change to SP 15 Safeguarding of existing Strategic Employment Sites in respect of Pembroke Dock cluster (Royal Dockyard) S/EMP/096/00002	No change
F.	No change to SP 15 Safeguarding of existing Strategic Employment Sites in respect of Waterloo & London Road Pembroke Dock Cluster S/EMP/096/C2, namely, Ferry Lane S/EMP/096/00004, Kingswood S/EMP/096/00005 and Waterloo & London Road S/EMP/096/00006.	No change. See representation reference 1545/1 in respect of policy GN 1 General Development Policy
G.	Include additional text in the policy wording of SP 15 Safeguarding of existing Strategic Employment to allow for exceptional circumstances where other uses may be permitted.	FC4.SP15.01
H.	No change to SP 15 Safeguarding of existing Strategic Employment Sites in respect of the name of S/EMP/096/C2 Waterloo & London Road Pembroke Dock Cluster	No change

## 4.20 Pembroke Housing

Are the Pembroke housing allocations appropriate for the life of the Plan?	
<b>LDP and Other Document References</b>	<ul style="list-style-type: none"> <li>i. Proposals Map Pembroke</li> <li>ii. SP 2 Housing Requirement</li> <li>iii. SP 6 Settlement Hierarchy – Urban Settlements</li> <li>iv. SP 7 Settlement Boundaries</li> <li>v. SP 8 Regional Growth Areas and Urban Settlements</li> <li>vi. GN 10 Mixed-use proposals</li> <li>vii. GN 16 Residential Allocations</li> <li>viii. GN 36 Transport Routes and Improvements</li> <li>ix. GN 52 Protection of Open Spaces with Amenity Value</li> <li>x. Appendix 2 Housing Components and Trajectory – Table A: Housing Supply.</li> <li>xi. Planning Obligations Supplementary Planning Guidance</li> <li>xii. Candidate Sites' Register and Site Assessment</li> <li>xiii. Financial Viability Report (FVR)</li> <li>xiv. Open Space Assessment</li> <li>xv. Strategic Flood Consequence Assessment (SFCA)</li> <li>xvi. Technical Advice Note 15 'Development, Flooding and Coastal Erosion'. 31<sup>st</sup> March 2025.</li> <li>xvii. Urban Facilities Background Paper</li> </ul>

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
<b>Representations related to the Candidates Sites Register and Site Assessment</b>		
General comments provided in approval of the decisions made in the Site Assessment procedure for Candidate Sites 079 (Land at St Georges Meadow, Fourth Lane), 087 (Land at Slothy Mill), 095 (Land Adjacent to Rose Valley, Lower Lamphey Road), 119 (Land North of Railway Station, Lower Lamphey Road), and 281 (Land at Eastgate Centre).	1744/7 1744/8 1744/10 1744/11 1744/12	Pembroke Town Council
Candidate Site 035 (Adjacent to Grove Gardens) should be included within the Settlement Boundary.	<b>34575/1</b>	<b>Mr &amp; Mrs R&amp;H Parnell</b>
Querying Highways objection to Candidate Site 087 (Land at Slothy Mill) and subsequent exclusion of land from Pembroke Settlement Boundary.	<b>1596/1</b>	<b>Millstone Holidays Pembroke (Babb Architecture 4273)</b>



Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
Comments of approval for the safeguarding of Candidate Site 353 (Pembroke Regeneration Project Phase 1 (Bridgend Terrace Diversion) and Phase 2 (Pembroke Western Bypass))	1744/4	Pembroke Town Council
Objections to residential allocation at Candidate Site 373 (East of the Glen, Lower Lamphey Road).	4422/1 4423/1 4355/1 4356/1 4036/1 1744/14 4110/1 4155/1 4398/1 4023/1 4023/2 4023/3 4023/4 4023/5	R Haresign Y Phillips L Puzey Y & D Marriot L Duffy Pembroke Town Council A Marriott L Smith G Heinz L Priestly
Candidate Sites 174 & 175 (Adjacent to Golden Ridge, Golden Lane) should be reconsidered for allocation in Deposit Plan 2.	2873/1	Mr & Mrs A & P Buckley
Representations related to policy <b>GN 10 Mixed-use proposals</b> . Allocation reference <b>South Quay, Pembroke MXU/095/LDP2/01</b>		
The site is crossed by a 150mm diameter sewer.	2603/72	Dwr Cymru/Welsh Water
Representations related to policy <b>GN 16 Residential Allocations</b>		
Representations related to <b>North of Gibbas Way, Pembroke HSG/095/00144</b>		
The site is crossed by a 150mm diameter sewer.	2603/29	Dwr Cymru/Welsh Water
General support for the site with comments raising concern for an increase in pedestrian and road traffic, and the increased stress on GP surgeries and other community facilities.	1744/6	Pembroke Town Council
Representations related to <b>Between St Daniels Hill &amp; Norgans Hill HSG/095/LDP2/1</b>		
Prior to development taking place, a hydraulic modelling assessment will be required. The public sewerage	2603/30	Dwr Cymru/Welsh Water

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
network can accept the potential foul flows from the development site as can the Pembroke Dock WwTW.		
Support the site being allocated for housing development. Concerns raised regarding the viability appraisal of the site, which led to 25% of units on-site needing to Affordable Housing (AH). This is in contrast to LDP1 requiring 10% affordable housing and adjacent LDP2 sites South West of Southlands, St. Daniels Hill HSG/095/LDP2/2 requiring 12.5% and South East of Southlands St.Daniels Hill HSG/095/LDP2/5 identified for 15%.	4415/2	Persimmon Homes West Wales
Representations related to <b>South West of Southlands, St. Daniels Hill HSG/095/LDP2/2</b>		
Prior to development taking place, a hydraulic modelling assessment will be required. The public sewerage network can accept the potential foul flows from the development site as can the Pembroke Dock WwTW.	2603/31	Dwr Cymru/Welsh Water
<p>Due to the elevation of the new site proposals, and following precedents of previous planning approvals in the St Daniel's Drive development to the north of Underdown, we propose the following restrictions:</p> <ul style="list-style-type: none"> <li>• Properties adjacent to the northern and eastern boundaries should be single storey, particularly noting the gradient of the land and the potential to overlook existing properties.</li> <li>• No properties to be built within 10 metres of the boundaries.</li> <li>• Before any development commences, a 2-metre tall close-boarded fence to be erected along the boundaries.</li> <li>• All existing banks, hedgerows and trees to be preserved along the boundaries.</li> </ul> <p>These restrictions would support Sustainability Objective 21 (Protect, enhance and value the built heritage</p>	4384/2	J & M van der Pas

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
and historic environment) and Sustainability Objective 18 (Maintain, enhance and value biodiversity).		
<b>Representations related to East of Golden Hill Road HSG/095/LDP2/4</b>		
Prior to development taking place, a hydraulic modelling assessment will be required. The public sewerage network can accept the potential foul flows from the development site as can the Pembroke Dock WwTW.	2603/32	Dwr Cymru/Welsh Water
Before any development takes place the highway in the area needs to be upgraded.	1744/5	Pembroke Town Council
<b>Representations related to South East of Southlands St.Daniels Hill HSG/095/LDP2/5</b>		
Prior to development taking place, a hydraulic modelling assessment will be required. The public sewerage network can accept the potential foul flows from the development site as can the Pembroke Dock WwTW.	2603/33	Dwr Cymru/Welsh Water
<p>Due to the elevation of the new site proposals, and following precedents of previous planning approvals in the St Daniel's Drive development to the north of Underdown, we propose the following restrictions:</p> <ul style="list-style-type: none"> <li>• Properties adjacent to the northern and eastern boundaries should be single storey, particularly noting the gradient of the land and the potential to overlook existing properties.</li> <li>• No properties to be built within 10 metres of the boundaries.</li> <li>• Before any development commences, a 2-metre tall close-boarded fence to be erected along the boundaries.</li> <li>• All existing banks, hedgerows and trees to be preserved along the boundaries.</li> </ul> <p>These restrictions would support Sustainability Objective 21 (Protect, enhance and value the built heritage and historic environment) and Sustainability Objective 18 (Maintain, enhance and value biodiversity).</p>	<b>4384/2</b>	<b>J &amp; M van der Pas</b>

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
Representations for <b>New Sites</b> to be considered for inclusion in policy <b>GN 16 Residential Allocations</b>		
Proposed New Site. No details provided.	<b>4401/1</b>	<b>Mr Yerbury</b>
Proposed <b>New Site 3 Land at Orange Hall south of B4320 Monkton Main Road.</b> Request for an additional housing allocation to accommodate a growing population, much of which will be over 65 years old. The site has advantages over other allocations as it is located closer to amenities and services such as a shop, post office and bus stop.	<b>34440/1</b>	<b>A Ferrier Lankshear, F Harries, M Ferrier, Simon Ferrier C Lankshear</b>
Proposed <b>New Site 6 Land adjacent to South Terrace, Norgans Hill</b> (also approximately half of adopted LDP1 allocation HSG/095/00153 Adjacent to Monkton Swifts). The landowner requests that the land is allocated for housing on the following grounds: <ul style="list-style-type: none"> <li>• The original Joint Unitary Development Plan and adopted LDP 1 allocation to develop the site was made by the Council itself and therefore it must have seen merit in it.</li> <li>• Both landowners have been supportive of the adopted LDP1 development as required by the Planning Department: 9 acres for 118 units including 10% affordable housing.</li> <li>• The landowners of new site 6 have been in discussion with the Director of Barton Willmore of Cardiff, who forwarded their letter offering the land for housing to ATEB Housing Association. This led to meetings with Jonathan Cole (and his predecessor) of ATEB who are very interested in purchasing New Site 6 initially, which would form Phase 1 of the whole adopted LDP1 development of 9</li> </ul>	4041/1	H Gibby et al

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
acres. In fact, negotiations have progressed to the stage where a price has been agreed and a conditional contract (subject to ATEB carrying out the necessary surveys etc and to them obtaining planning permission) is currently in the hands of the respective solicitors.		
Proposed <b>New Site 27 Land south of Underdown, Grove Hill</b> . Object to the settlement boundary excluding part of the garden associated with the property Underdown. With the current new site proposals, housing allocation references HSG/095/LDP2/2 & HSG/095/LDP2/5, south-west and south-east of Southlands respectively, there will a natural line extending east to include the southern part of our garden within the Development Boundary.	<b>4384/1</b> <b>4384/3</b>	<b>J &amp; M van der Pas</b>
<b>Representations related to policy GN 52 Protection of Open Spaces with Amenity Value</b>		
Querying the Open Space designation at <b>Slothy Mill, Pembroke OSP/095/23</b> . The objection states that the land has been included in order to meet a shortfall of amenity open space provision within Pembroke identified by the Open Space Assessment.	<b>1596/2</b>	<b>Millstone Holidays Pembroke (Babb Architecture 4273)</b>
<b>Representations related to GN 36 Transport Routes and Improvements in respect of Well Hill Improvement TS/LDP2/03</b>		
General comments provided in approval of the decision made in the Site Assessment procedure for Candidate Site 356 (Well Hill improvement)	1744/13	Pembroke Town Council
<b>Response</b>		
<b>Candidate Sites Register and Site Assessment</b>  1. Pembroke Town Council supports the outcomes of the Candidate Site Assessment for <b>Candidate Sites 079 (Land at St Georges Meadow, Fourth Lane), 087 (Land at Slothy Mill, Well Hill), 095 (Adjacent to Rose Valley, Lower Lamphey Road), 119 (North of Railway Station, Lower Lamphey Road) and 281 (Land at Eastgate Centre)</b> . Support for the Candidate Site Assessment is welcomed.		

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
<p>2. <b>Candidate Site 035 (Adjacent to Grove Gardens) should be included within the Settlement Boundary.</b> Pembrokeshire County Council's <b>Strategic Flood Consequence Assessment (SFCA)</b> assessed the candidate sites as a category Red, with the sea being the primary source of flooding. A category red means that it is inappropriate to allocate at this location for a highly vulnerable use such as housing. The Flood Map for Planning identifies that the site lies within a Flood Zone 2 and Flood Zone 3. As outlined in <b>Technical Advice Note (TAN15)</b>, allocations for highly vulnerable new development should not be made in Flood Zone 3.</p> <p>3. <b>Candidate Site 087 (Land at Slothy Mill, Well Hill) should be within the settlement boundary for Deposit Plan 2.</b> The response references applications 11/0802/PA (Four self-contained holiday lodges) and 19/1218/PA (Erection of a single storey timber cabin). Candidate Site 087 is located within Pembroke Town (SP 6 Settlement Hierarchy) and measures 0.42 hectares. A proposed housing allocation would result in an estimated 12.6 units to be in accordance with GN.13 Residential Development standard of 30 units per hectare in Towns. The Highway Authority has reviewed Candidate Site 087 (capable of accommodated an estimated 12 residential units) and has strongly objected due to significant constraints that cannot be mitigated. Therefore, it is not considered an appropriate site for residential development.</p> <p>4. <b>Positive comments made towards the potential development of Candidate Site 353 (Pembroke Community Regeneration Project. Phase 1 Bridgend Terrace Diversion &amp; Phase 2 Pembroke Western Bypass).</b> Pembroke Town Council is supportive of a by-pass at the above site, subject to the Town Council being consulted from the beginning of the development process, and if an easy route for traffic can be provided to enable traffic to pass through Main Street. The detailed assessment of Candidate Site 353 raised major objections in relation to the Natural and Historic Environment. Additionally, no finance or delivery timetable was provided with the submission. Therefore, constraints on site have deemed the site to be unsuitable for safeguarding as a transport route under policy GN 36 Transport Routes and Improvements.</p> <p>5. <b>Support for the non-allocation of Candidate Site 373 (East of the Glen, Lower Lamphey Road) for residential development in LDP 2 Deposit 2.</b> Candidate Site 373 was unsuccessful as the site assessment concluded that 'development would be premature until Well Hill highway improvement in Pembroke has been carried out.' The site was therefore not included within Pembroke Settlement Boundary and has not been allocated for development in Deposit Plan 2. Support for the Candidate Site Assessment is welcomed.</p> <p>6. <b>Candidate Sites 174 and 175 (Adjacent to Golden Ridge, Golden Lane) should be allocated and included in Deposit Plan 2.</b> The Highways Authority has reviewed Candidate Sites 174/175 and has strongly objected due to significant constraints that cannot be mitigated. Therefore, they are not considered appropriate for allocation for any of the proposed uses.</p> <p><b>Policy GN.10 Mixed-use proposals.</b></p> <p>7. South Quay, Pembroke MXU/095/LDP2/01 - Dwr Cymru comments noted.</p>		

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
<b>Policy GN 16 Residential Allocations</b>		
<b>8. North of Gibbas Way, Pembroke HSG/095/00144</b> - Dŵr Cymru comments noted.		
<p>9. It is noted that there is overall support for the allocation from Pembroke Town Council but they raise concerns regarding development on Gibbas Way causing increased vehicular and pedestrian traffic and causing stress on local services. The Council's Highway Authority has not objected to the proposed allocation. The Highway Authority provided comments during the 2019 site assessment to require a pedestrian crossing across Upper Lamphey Road at the junction with St Michaels Road but this has since been completed. In terms of impact on GP provision, Hywel Dda health board was consulted during the site assessment process in 2019 and as part of the Deposit Plan 2 consultation. No comments were received in respect of GP provision.</p>		
<b>10. Between St Daniels Hill &amp; Norgans Hill HSG/095/LDP2/1</b> - Dŵr Cymru comments noted.		
<p>11. Permission Homes West Wales promoting and supporting the allocation of the site is welcomed. In terms of the concerns raised regarding the percentage of units that would need to be affordable, the representation firstly cites the adopted LDP1 rate of 10% for housing allocations. The information on which this rate relies on is based on work undertaken approximately 15 years ago and is therefore out of date. In respect of the adjacent housing allocations on St Daniels Hill having lower rates, this is based on high-level testing as opposed to the site-specific appraisal work undertaken for the site in question. In terms of the two sites having differing rates, the <b>Financial Viability Report (FVR)</b> took a new approach for this Deposit Plan and took into account the fact that as the size of a site increases, it is possible to achieve greater economies of scale and therefore result in higher profit margins. This is reflected in policy GN 20 Local Needs Affordable Housing, with the unit brackets reflecting S.106 on-site requirements and off-site financial contribution triggers set out in the current version of <b>Planning Obligations Supplementary Planning Guidance</b>. It should be noted that if policy GN 20 requirements were to be applied to the site known as Between St Daniels Hill &amp; Norgans Hill, it would be expected to provide 30% of units as affordable housing. As the key site viability appraisal work identified abnormal costs, a lower rate of 25% was considered to be appropriate.</p>		
<b>12. South West of Southlands, St. Daniels Hill HSG/095/LDP2/2</b> - Dŵr Cymru - comments noted.		
<p>13. <b>Comments on the design details of the future housing development:</b> The aim of the Local Development Plan in respect of housing is to allocate sites that in principle are suitable for development. The height of dwellings, site layout and boundary treatment are all matters that would be best dealt with at the planning application stage. The Development Sites and Infrastructure Supplementary Planning Guidance will also include some of these details and there will be a formal consultation on its content at a future date.</p>		
<b>14. East of Golden Hill Road HSG/095/LDP2/4</b> -		



Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
15. Dŵr Cymru comments noted.		
16. Request from Pembroke Town Council that before any development takes place the highway in the area is upgraded: The Council's Highway Authority (CHA) advised that Golden Hill Road will require modifications to facilitate a new access for the site and pedestrian links will also need to be provided. The opportunity to comment on the detail of highways requirements will be available during the consultation on the Development Sites and Infrastructure Supplementary Planning Guidance at a future date.		
17. <b>South East of Southlands St.Daniels Hill HSG/095/LDP2/5</b> - Dŵr Cymru comments noted.		
18. Comments on the design details of the future housing development: The aim of the Local Development Plan in respect of housing is to allocate sites that in principle are suitable for development. The height of dwellings, site layout and boundary treatment are all matters that would be best be dealt with at the planning application stage. Having said this, the Development Sites and Infrastructure Supplementary Planning Guidance will include some of these details and there will be a formal consultation on its content at a future date.		
<b>New Sites</b> to be considered for <b>Policy GN 16 Residential Allocations</b>		
19. <b>New Site</b> submitted by <b>Mr Yerbury</b> representation number <b>4401/1</b> : No supporting documents or additional information regarding the proposed location for a new site has been provided. It is therefore not possible to make any comment on this representation.		
20. <b>New Site 3 - Land at Orange Hall south of B4320 Monkton Main Road:</b> The site was not submitted during the call for candidate sites in 2018 and 2019 and has therefore not been subjected the full site assessment and consultation process. A sufficient number of housing allocations has been identified for Pembroke and the Plan area as a whole. Additional dwellings are not required for the Plan period.		
21. <b>New Site 6 Land adjacent to South Terrace, Norgans Hill:</b> The site was not submitted during the call for candidate sites in 2018 and 2019 and has therefore not been subjected the site assessment and consultation process. A sufficient number of housing allocations have been identified for Pembroke and the Plan area as a whole. Additional dwellings are not required for the plan period. The site could, however, be brought forward under the adopted LDP1. Equally, as ATEB are the interested party, it may be possible to bring the site forward as an affordable housing exception site under LDP2 policy GN 21 Exception Sites for Local Needs Affordable Housing.		
22. <b>New Site 27 Land South of Underdown, Grove Hill:</b> The site was not submitted during the call for candidate sites in 2018 and 2019 and has therefore not been subjected to the site assessment and consultation process. The adjacent allocation reference South East of Southlands, St.Daniels Hill HSG/095/LDP2/5 is known to have a 24-inch raw water main running on a south-west to south-east direction clipping the edge of the site. This would intersect New Site 27 and the easement required for maintenance would render much of the site most likely impossible to develop. Also, a sufficient number of housing allocations have been identified for		

Summary of Issues		Raised By	Name (wish to speak at Examination in bold)
<p>Pembroke and the Plan area as a whole. These additional dwellings are not required for the Plan period.</p> <p><b>Policy GN 52 Protection of Open Spaces with Amenity Value</b></p> <p><b>23. Open Space designation at Slothy Mill OSP/095/23.</b> The methodology for designating open space is set out in the Open Space Assessment Background Paper. It is required to meet one of the following characteristics listed in paragraph 5.4, namely public parks and gardens, natural and semi-natural greenspaces, green corridors, outdoor sports facilities, amenity greenspace, provision for children and young people, allotments, community gardens, and city (urban) farms, cemeteries and churchyards, accessible areas of countryside in the urban fringe, civic spaces or water. Land is not designated based on meeting a target area for a settlement, as the objection suggests. However, it is considered that the western parcel of the land on re-evaluation should not be designated open space as it appears to be in agricultural use and therefore does meet the any of the criteria set out above.</p> <p><b>Policy GN 36 Transport Routes and Improvements</b></p> <p><b>24. Well Hill Improvement TS/LDP2/03.</b> Pembroke Town Council supports the outcomes of the Candidate Site Assessment for Candidate Site 356 (Well Hill improvement). Support for the Candidate Site Assessment is welcomed.</p>			
Recommendations			Focussed Change/ Edit Ref
A.	No change to the Candidate Site Register and Site Assessment in respect of candidate site references 079, 087, 095, 119, 281		N/A
B.	No change to the Candidate Site Register and Site Assessment in respect of candidate site reference 035		N/A
C.	No change to the Candidate Site Register and Site Assessment in respect of candidate site reference 353		N/A
D.	No change to the Candidate Site Register and Site Assessment in respect of candidate site reference 373		N/A
E.	No change to the Candidate Site Register and Site Assessment in respect of candidate site references 174 and 175		N/A
F.	No change to policy GN 16 Residential Allocations in respect of reference North of Gibbas Way, Pembroke HSG/095/00144		N/A
G.	No change to policy GN 16 Residential Allocations in respect of reference Between St Daniels Hill & Norgans Hill HSG/095/LDP2/1		N/A
H.	No change to policy GN 16 Residential Allocations in respect of reference South West of Southlands,		N/A

Summary of Issues		Raised By	Name (wish to speak at Examination in bold)
	St. Daniels Hill HSG/095/LDP2/2. See also issue paper Pembroke and Pembroke Dock Housing.		
I.	No change to policy GN 16 Residential Allocations in respect of reference East of Golden Hill Road HSG/095/LDP2/4		N/A
J.	No change to policy GN 16 Residential Allocations in respect of reference South East of Southlands St.Daniels Hill HSG/095/LDP2/5. See also issue paper Pembroke and Pembroke Dock Housing.		N/A
K.	No change to policy GN 16 Residential Allocations in respect of New Sites 3, 6 and 27		N/A
L.	Remove western half of Open Space designation at Slothy Mill reference OSP/095/23. For correlation, the candidate sites register should also be updated in respect of candidate Site 087 Slothy Mill, Pembroke		FC5.GN52.Pembroke.01 and OE23
M.	No change to policy GN 36 Transport Routes and Improvements in respect of Well Hill Improvement TS/LDP2/03		N/A

## 4.21 Policy GN 3 Infrastructure and New Development

**Is Policy GN 3 Infrastructure and New Development required or does its purpose need to be clarified? There is an objection to various aspects of the policy from the Home Builders' Federation.**

**LDP and Other Document References**

i) GN 3 – Infrastructure and New Development – various aspects

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
<p>Objection from the Home Builders' Federation – who note that the policy appears to cover both the need for infrastructure to serve the development as well as items often referred to as developer contributions.</p> <p>HBF contends that the list of potential areas of contribution includes items which do not appear to fit into the heading as they are unlikely to be required as a direct result of the development, and they would normally be required by other policies in an LDP. These include, regeneration, waste, renewable and low carbon energy (GN 4), biodiversity (GN44) and broadband (GN2/GN27).</p> <p>The policy is considered to be confusing and in parts duplicates other policies.</p> <p>The HBF suggests a separate policy relating to developer contributions limited to those areas which could result in a requirement generated by the impact of the new development only.</p>	<b>1533/2</b>	<b>Home Builders Federation</b>
<p>Network Rail has commented on this policy. It notes that development that generates a need for new or improved infrastructure on or off site, is required to be funded by the development with contributions sought for sustainable transport facilities. As the statutory undertaker responsible for maintaining and operating railway infrastructure across Wales, Network Rail has commented in detail on the critical considerations for ensuring the safety and functionality of the railway network within the framework of this policy. Where development necessitates the need for rail improvements, we would expect the developer to provide contributions towards such mitigation which</p>	1545/2	Network Rail

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
<p>should be secured through a S106 agreement. As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It is therefore appropriate to require developer contributions to fund such improvements.</p>		
<p>The Theatres Trust continues to welcome and support policy GN3, as it makes reference to seeking contributions towards new and improved community and cultural facilities to meet needs.</p>	1555/1	The Theatres Trust
<p>Dwr Cymru Welsh Water supports the provision within the policy that in circumstances where the development generates the need for infrastructure improvements that are not already programmed for delivery by infrastructure providers, then it must be funded by the development. The policy identifies that appropriate contributions may be sought for a range of purposes, including water, wastewater treatment, and sewerage infrastructure. Where there is insufficient capacity and where no reinforcement works are programmed within DCWW's AMP Capital Investment Programme, the requisition provisions of the Water Industry Act can be entered into for water and sewerage network infrastructure necessary to serve the development site. The requisition provisions do not apply to wastewater treatment works (WwTW) and planning obligations, or a commercial agreement, may be required between the developer and Welsh Water to deliver the necessary improvements.</p>	2603/5	Dwr Cymru Welsh Water
<p>G. Price, represented by Boyer Planning, has commented that whilst their representation is not an objection, the need for Policy GN 3 Infrastructure and New Development is questioned. It is contended that the requirement of physical, community and green/blue infrastructure will be assessed on an individual site basis and secured via legal agreements entered into under Section 106. Where specific infrastructure is required for allocated sites then this information is most</p>	3719/5	<b>G. Price (represented by Boyer Planning)</b>

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
relevant in that policy (rather than in a generic policy, such as GN 3).		
Welsh Government Place Division, Housing and Regeneration Directorate (represented by Lichfields) has provided a detailed submission of support for policy GN 3.	4393/10	Welsh Government Place Division, Housing and Regeneration Directorate (represented by Agent 4394 Lichfields)
The Pembrokeshire Coast National Park Authority has submitted a supporting representation for policy GN 3, noting that PCC and PCNPA have adopted joint supplementary planning guidance on Planning Obligations and intend to prepare joint supplementary planning guidance for their replacement Local Development Plans. PCNPA notes that both Plans seek to prioritise affordable housing provision in the case of housing developments, where necessary. PCNPA also notes that paragraph 5.32 states that PCC will discuss any proposals to set a Community Infrastructure Levy with the PCNPA, noting that further engagement on the progression of the Community Infrastructure Levy would be welcomed.	<b>34485/20</b>	<b>Pembrokeshire Coast National Park Authority</b>
Response		
<ol style="list-style-type: none"> <li>1. Policy GN 3 on Infrastructure and New Development has received a variety of consultation responses, including one objection, two comments and a further four representations of support.</li> <li>2. With regard to the objection from the Home Builders' Federation, PCC notes that policy GN 3 does indeed have two aspects, one relating to the need for development generating a need for new or improved infrastructure (and where this is not already programmed) to fund that provision; and the other setting out the range of purposes for which contributions may be required. This policy is a modified version of one included in the current LDP and it has not caused any noticeable level of confusion in operation. It is not prescriptive, as the need for contributions will vary from proposal to proposal. The reasoned justification to the policy elaborates on the reasons for the inclusion of many of the items in the GN 3 potential contributions list. However, the need for any contributions sought to be related in scale and kind to the development is already acknowledged by the policy and contributions will only be sought where it is appropriate and necessary to do so - and in accordance with WG Circular 13/97. There are various references to planning obligations, Section 106 and developer contributions in Planning Policy Wales edition 12, including some that are specific to topics that the representor considers unnecessary for inclusion in the GN 3 potential contributions list. Whilst in many instances where contributions are sought, it will be in conjunction with housing proposals, GN 3 is not exclusive to residential development. For these reasons, no changes to the policy are proposed in response to this representation.</li> </ol>		

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
<p>3. The comments provided by Network Rail have been noted. These do not require any change to be made to policy GN 3. G. Price (represented by Boyer Planning) has also commented on this policy. Although PCC notes that this representation is not framed as an objection to policy GN 3, it does call into question the need for policy GN 3. From a Council perspective, this policy is needed, as it explains that where a development proposal results in a need for new or improved infrastructure, services or community facilities, and this is not already programmed by a service or infrastructure company, then it must be funded by the development itself. There are two criteria to explain the considerations in this regard and a paragraph to reference viability issues. The policy also sets out the measures necessary to physically deliver a development and ensure it is acceptable in planning terms. A range of purposes are identified, with priority contributions determined on the basis of individual circumstances on development sites and the key priorities for the Council. This policy therefore provides a foundation for any section 106 legal agreement that is needed in conjunction with the granting of a planning permission. The Council is not proposing any changes to GN 3 in response to this representation.</p> <p>4. The representations of support from The Theatres Trust, Dwr Cymru Welsh Water, Welsh Government Place Division, Housing and Regeneration Directorate (represented by Lichfields) and the Pembrokeshire Coast National Park Authority record support for policy GN 3 and are welcomed.</p> <p><b>Conclusion</b></p> <p>5. The representations received comprise a single objection, two further representations commenting and four supporting representations for GN 3. There is a diversity of matters referenced in these representations, but it is noted that only one of the representations has been framed as an outright objection. Having considered the matters raised, no Focussed Changes to the Plan are proposed in response to the representations received on GN 3.</p>		
Recommendation		Focussed Change/Edit Ref
A.	No Focussed Changes are proposed in response to the representations received on policy GN 3 – Infrastructure and New Development	N/A



## 4.22 Policy GN 37 Working of Minerals

GN 37 Working of Minerals	
LDP and Other Document References	

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
I. GN37 Working of Minerals We are pleased with the inclusion of criterion 4 which will ensure that groundwater is protected.	2603/15	Dwr Cymru
II. Policy GN 37 Working of Minerals: The terrestrial sand and gravel landbank and the apportionment of provision to meet future needs is considered on a regional basis. There are current sand and gravel production sites in the Pembrokeshire Coast National Park, further sites and allocations in Ceredigion and some small-scale production in Carmarthenshire. However, the regional landbank for sand and gravel is rather limited in comparison with that available for hard rock. National Park sand and gravel production at the two current production sites will eventually cease and production and allocation sites elsewhere in the region are of limited capacity. New terrestrial production sites within the region but outside the National Park are needed and the need for a collaborative approach and a Statement of Sub-Regional Collaboration as identified in the Plan is agreed. The National Park Authority supports the allocated sites MN/000/LDP2/001 Trefigin Quarry extension to provide for future sand and gravel needs. Please see assessment Site 497 (Trefigin) regarding landscape mitigation requirements to protect the Special Qualities of the National Park. Support the compatibility of approach between the two Plans and with national planning policy. Support Policy GN 37 Working of Minerals. Support Trefigin and sand and gravel allocation in principle, subject to landscape mitigation measures (see Site Assessment 497)	34485/33	<b>Pembrokeshire Coast National Park Authority</b>
III. MN/000/LDP2/001 Trefigin Quarry extension There are no watermains near the site. There are no public sewers near the site.	2603/83	Dwr Cymru
IV. I write to object to the above candidate site in your LDP review. For the avoidance of doubt I	4106/1	<b>J O'Connor</b>

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
<p>attach a copy of your map with my property shaded in black on your map (App 1). I object to the candidate site for a number of reasons:</p> <ol style="list-style-type: none"> <li>1. The site is too close to my property, approximately 70 meters from my garden; my home is very close to the development. This will create unacceptable dust pollution, noise pollution and air pollution to my home. Google Earth or O/S maps will show how close this development is to my home. In addition the development of an industrial site adjacent to my home is entirely unacceptable, there will be an industrial quarry which is impossible to screen off without creating an equally unsightly fence. The dust and noise alone will make life in my family home miserable. Distance from proposed development to my house / garden</li> <li>2. Value to my property. It is without doubt a development of this kind will affect the value of my property tremendously. This is unacceptable.</li> <li>3. Wildlife. In the area you are proposing, there is an important breeding ground for Common Frogs and it is an overwintering ground to Snipe.</li> <li>4. Local business. There are two perfectly good farms that could be ruined by the development, namely Mount farm and Pallau farm. Mount farm is a family farm and would be a tremendous blow to the community if they were forced out of business due to this development.</li> <li>5. There are already 3 quarries within a 5 mile radius Pantgwyn, Trefigin and Cardigan Sand and Gravel.</li> <li>6. The access to this quarry will be on a very dangerous stretch of road. The photo below is a notorious bend where several people have crashed.</li> <li>7. Unsightly quarry so close to the road. The development of this quarry will have a massive effect on the local area's tourism. The quarry would be impossible to hide and would be an extreme eyesore on the surrounding countryside.</li> <li>8. The availability to increase production in Pantgwyn quarry and Trefigin quarry. Both of these quarries could be developed further without such extreme consequences on the surrounding area.</li> </ol>		

Summary of Issues		Raised By	Name (wish to speak at Examination in bold)
9. Distance to my agricultural land. I very much doubt any development to the fields will have no consequence to the productivity of my land. Photos of the site and proximity to the residence are included with the submission.			
Response			
<ol style="list-style-type: none"> <li>1. Support for the policy is welcomed.</li> <li>2. Support for the policy is welcomed and comments regarding landscape mitigation are noted.</li> <li>3. Comments regarding watermainns are noted.</li> <li>4. The response is noted, however while the site in question was allocated for a sand and gravel quarry by LDP 2, Deposit Plan 1 in 2020, the allocation has not been taken forward for LDP 2, Deposit Plan 2. Since 2020, further work has been done in conjunction with the preparation for a Statement of Sub-Regional Collaboration on minerals planning for the West Wales sub-region (which is currently still ongoing). This has included a re-evaluation of potential areas of search for future sand and gravel supplies across the sub-region, set in the context of the limited future supply of sand and gravel in SW Wales and the long-term expectation that production of minerals will eventually be taken out of National Park locations. For LDP 2, it is now felt that the appropriate response in relation to the site at Pallau and Mount Farm is to not allocate, but to identify it, along with various other sites in the same general area, as part of an area of search for potential future sand and gravel supplies. As policy GN 37 records, 'For sand and gravel, if the allocated site is unable to provide fully for future needs, the Areas of Search for sand and gravel defined on the Proposals Map will provide a focus to encourage future interest from mineral operators'. That does not, in itself, commit to any future quarrying proposals on the identified sites, but it will focus attention on areas of known resource. Looking ahead, should a need for further sand and gravel production sites be needed and this site be re-evaluated, the amenity of existing residents, site ecology, potential impacts on existing farming businesses, highway access requirements and visual impacts would all require careful consideration. Mineral resources are found where natural processes have put them, so the choice of potential future production sites to provide for future construction are limited and difficult choices sometimes need to be made.</li> </ol>			
Recommendations			Focussed Change/Edit Ref
A.	No changes proposed.		N/A

## 4.23 Visitor Accommodation Policies & Camping

### Supplementary Planning Guidance

#### Visitor Accommodation Policies: Is the Plan framework and supporting guidance for considering visitor accommodation appropriate and fit for purpose?

<b>LDP and Other Document References</b>	<ul style="list-style-type: none"> <li>i. Policy GN 55 Serviced Accommodation</li> <li>ii. Policy GN 56 Caravan, Camping and Chalet Development</li> <li>iii. Policy GN 58 Self-Catering Accommodation</li> <li>iv. Caravan, Camping and Chalet Landscape Capacity Assessment SPG</li> <li>v. Tourism Background Paper</li> </ul>
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<b>Summary of Issues</b>	<b>Raised By</b>	<b>Name (wish to speak at Examination in bold)</b>
<b>Identification of Trefloyne Manor</b>		
Recognise Trefloyne Manor as a <b>tourist destination</b> in the Plan.	1917/1 1917/2 1917/3	<b>Mr and Mrs Beynon (Agent - Mango Planning)</b>
<b>Policy GN 55 Serviced and Hotel Accommodation</b>		
Amend the Policy to allow new developments at locations where there is an existing tourist accommodation facility.	1917/1	<b>Mr and Mrs Beynon (Agent - Mango Planning)</b>
<b>Policy GN 56 Caravan, Camping and Chalet Development</b>		
i) Amend Policy GN 56 (Caravan, Camping and Chalet Development) to allow new medium and large-scale proposals at locations where there is existing tourist accommodation.	1917/2	<b>Mr and Mrs Beynon (Agent - Mango Planning)</b>
ii) The Council's application of Policy GN 56 will be based entirely on the draft SPG. Case law shows this is not permissible. Determining the location of new development must be part of the statutory development plan process. It is unfair and unreasonable to consult on a policy where the teeth are in a separate document which is not subject to statutory consultation and environmental assessment and the content of which is not yet known.	1917/2	<b>Mr and Mrs Beynon (Agent - Mango Planning)</b>
iii) Chalets used for holiday purposes are of a permanent nature. The policy should be more robust and consider the principles of sustainability as well as landscape for this type of development.	4326/4	Mr M Bell

Summary of Issues	Raised By	Name (wish to speak at Examination in bold)
iv) The current LDP states there is an overprovision of static caravans in Pembrokeshire. LDP2 allows development of new caravan sites or expansion of existing ones where the landscape capacity would not be exceeded. The Tourism Background Paper has no data on the occupancy rates of static or touring caravans, or the demand for such bedspaces. How do you know if more pitches are needed?	4379/3	T Cormack
v) With specific reference to the Narberth and Lampeter Vale area, recent changes to existing caravan sites have been to replace touring pitches with static caravan or lodge pitches without any reduction in number. Policy GN 56 should require a reduction in pitch numbers to account for the additional space needed. A balance is needed to protect the National Park.	4380/5 34751/6	Cllr A Cormack Amroth Community Council
vi) A definition of 'Landscape Capacity' is not provided. Amend the policy to read '...in terms of landscape and visual impact'.	4387/9 4388/10	<b>PRL Partnership (Agent Litchfields)</b> <b>Haven Leisure Ltd (Agent Litchfields)</b>
vii) 'Over concentration' and 'area' in Criterion 2 of the Policy need to be defined.	4387/9 4388/10	<b>PRL Partnership (Agent Litchfields)</b> <b>Haven Leisure Ltd (Agent Litchfields)</b>
viii) A definition of 'chalet' is required.	4387/9 4388/10	<b>PRL Partnership (Agent Litchfields)</b> <b>Haven Leisure Ltd (Agent Litchfields)</b>
ix) A distance of 400m is specified in paragraph 5.3.19 which is not in the policy and should be removed from the supporting text. A more nuanced approach is needed in rural areas.	4387/9 4388/10	<b>PRL Partnership (Agent Litchfields)</b> <b>Haven Leisure Ltd (Agent Litchfields)</b>
<b>Policy GN 58 Self-Catering Accommodation</b>		
i) Amend the policy to allow self-catering accommodation at locations where there is established tourist accommodation.	1917/3	<b>Mr and Mrs Beynon (Agent - Mango Planning)</b>
ii) There is an inconsistency between the policy and supporting text in paragraph 5.324 relating to 'Local Villages'.	4326/5	Mr M Bell
iii) A definition of 'chalet' is required.	4387/9 4388/10	<b>PRL Partnership (Agent Litchfields)</b> <b>Haven Leisure Ltd (Agent Litchfields)</b>

Response
<b>Trefloyne Manor</b>
<p>1. <b>Trefloyne Manor:</b> There are a great number of tourist destinations in Pembrokeshire, ranging from small individual properties to the County as a whole. Identification of individual properties, businesses, sites etc would be problematic and the diversity and dispersed nature of uses would not lend itself to a standard application of policies. No change is recommended.</p>
<b>Policy GN 55 Serviced and Hotel Accommodation</b>
<p>2. This representation relates to a large site, measuring 84ha. Within the site is the former Trefloyne Manor House which now accommodates 5 serviced guest rooms and a restaurant. The outbuildings associated with the Manor House have been converted to a further 7 serviced guest rooms with an additional serviced apartment in the loft of the former clubhouse. The former dovecote has been converted to a wellness retreat. The former grounds of the Manor House are used as an established parkland golf-course. Within the grounds there are also 11 self-catering lodges set within a woodland area to the south-east of the manor house. Planning permission was granted (ref 20/0422/PA) in December 2020 for a new club house. The representor is seeking amendments to policy GN 55 (Serviced and Hotel Accommodation) to seek assurance of acceptance of future developments, described as an expansion of the existing high-quality accommodation within the site.</p> <p>3. The change sought to Policy GN 55 (Serviced and Hotel Accommodation) is the inclusion of additional words which would allow further accommodation to be generally permitted at existing tourist accommodation sites. Extensions to existing businesses are, however, considered in under Criterion B. It is considered that the change requested by this representation is unnecessary.</p>
<b>Policy GN 56 Caravan, Camping and Chalet Development</b>
<p>4. <b>Representation 1917/2:</b> The change sought to Policy GN 56 (Caravan, Camping and Chalet Development) is the inclusion of additional words which would allow additional accommodation to be generally permitted at existing tourist accommodation sites. Extensions to existing businesses are, however, considered under criterion C of the policy. It is considered that the change requested by this representation is unnecessary.</p> <p>5. <b>Representation 1917/2:</b> with reference to Policy GN 56 (Caravan, Camping and Chalet Development), this representation raises concern about placing reliance on the Draft Supplementary Planning Guidance (SPG) on Caravans, Camping and Chalets regarding locational decisions for these types of development. A court case (<i>Wakil v LB Hammersmith [2012] EWCH1411(QB)</i>) is quoted as case law where it was established that documents that direct where development should and should not be located must be subject to and part of the statutory development plan evaluation process. The representor considers it "unfair and unreasonable to consult on a policy, the teeth of which will come in a separate document that is not subject to statutory consultation and environmental assessment, and the content of which is not yet known." As acknowledged in the representation, however, the draft SPG was published for public consultation alongside the Deposit Plan. The representor objects to reliance on the SPG, described in the representation as 'broad brush assessment' rather than applications being considered on their own merits in accord with the development plan. The Council considers that the SPG is intended to provide advice on a Landscape Character Area basis as to whether the landscape has capacity to accommodation additional camping, caravan and chalet accommodation based on a systematic assessment of the whole Plan</p>

area. It provides information about the landscape character elaborating on the requirements set out in Policy GN 56 (Caravan, Camping and Chalet Development) to ensure all new sites and site extensions are in acceptable locations in landscape terms. It is acknowledged within the SPG ( Paragraph 2.10) that *"...there is a spectrum of effects from different types of development on different sites.....The effects of individual developments would need to be demonstrated on a case by case basis."* The Council considers that the SPG supports Policy GN 56 (Camping, Caravan and Chalet Development) by providing detailed landscape character descriptions, landscape capacity constraints and possible mitigation. It is a published document which is being subject to public consultation alongside the emerging LDP and that the changes suggested are not necessary.

6. **Representation 4326/4:** Policy GN 56 (Caravan, Camping and Chalet Development) will be used for proposals for caravan, camping and chalet development which have a lesser degree of permanency than buildings or structures used for holiday occupation and self-build self-catering accommodation. Proposals for self-catering accommodation which is of a more permanent nature will be considered under Policy GN 58 (Self-Catering Accommodation) of the Deposit Plan which requires such development to be located within a Town, Service Centre or Service Village. The inclusion of 'Local Village' in the Policy is a drafting error (see response to representation 4326/5 below). It is not considered that any change is required to Policy GN 56 Caravan, Camping and Chalet Development as a result of this representation.
7. **Representation 4379/3:** The evidence prepared to support the static caravan policy in LDP1 was undertaken in 2010 and showed there to be a 13% spare capacity of static caravan pitches across the whole Plan area. The data was collected by viewing aerial photography and matching the pitch occupancy against the number of units with planning permission on each site. The survey therefore gave a limited picture of pitch occupancy based on the date when the aerial photographs were taken and some of the empty pitches would have been a result of operational changes (replacement of caravans etc). The aerial survey would not provide occupancy details. Demand for different accommodation types varies over time and many holiday park operators change pitch types (eg, touring caravan pitches to static caravan pitches) to cater for the changing requirements of visitors and their own businesses. Planning applications submitted to the Council for such changes demonstrate that the demand for static caravan accommodation often surpasses that of touring caravan and tent pitches within existing sites, particularly as the touring caravan, camper vans and tents are liberally available through Permitted Development rights (Certificated Sites and 28-day sites). The nature of Policy GN 56 allows for such changes to be considered in the most sustainable locations and where there is landscape capacity to accommodate these developments. No change is considered necessary as a result of this representation.
8. **Representations 4380/5 and 34751/6:** Policy GN 56 (Caravan, Camping and Chalet Development) allows for the consideration of changes within existing sites within the context of landscape capacity. It allows for each application to be considered on its merits. This may include reducing the number of pitches within an existing site, enlarging the overall site area with no increase in number of pitches or providing additional landscaping. Policy GN 1 (General Development Policy) includes a criterion to ensure that proposals do not have an unacceptable adverse effect on landscape character, quality or diversity, including the special qualities of the National Park. Enforcement of conditions of any planning permission granted is outside the scope of the Plan or the Plan process.
9. 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 Local Development Plan 2 and the



Council's Deposit 2 Local Development Plan 2 use a landscape character assessment as the basis for Supplementary Planning Guidance to support policies relating to camping and caravanning which may help to provide consistency across the two areas. No change is considered necessary as a result of these representations.

10. **Representations 4387/9 and 4388/10:** Support for the inclusion of Policy GN 56 (Caravan, Camping and Chalet Development) and the basis of the approach is noted. It is agreed that there is no definition provided for 'landscape capacity' which is stated in the Policy. This can be rectified by including the following definition after the first sentence of paragraph 5.311: *"Landscape capacity is the amount of change that a landscape character area can accommodate without adverse changes to the character or key characteristics or undue consequences for the achievement of landscape policies in the area. It takes into account existing development within the area as well as the landscape sensitivities and considers potential cumulative effects at a strategic level."*
11. **Representations 4387/9 and 4388/10:** The policy requires that proposals should not result in an over-concentration of sites within an area. This is a matter that will need to be taken into consideration on a case-by-case basis based on the principles of the policy – that is the need to ensure that the landscape has capacity to accommodate the development proposed. Paragraph 5.320 of the Deposit Plan refers to cumulative impact of sites being a material consideration. A definition of 'over-concentration' and 'area' are not considered necessary.
12. **Representations 4387/9 and 4388/10:** The Local Development Plan includes policies relating to caravan, camping and chalet development (GN 56) and other self-catering development (GN 58). Proposals will be considered against the appropriate policy taking into consideration the style, permanency of proposed units and use. Whilst 'chalets' are normally associated with wooden structures intended for use as holiday accommodation, the term can relate to a variety of structures and degree of permanency. This can range from wooden-clad static caravans to buildings akin to permanent dwellings, often of a particular style. Whilst there is a legal definition of a 'caravan' none exists for chalets. Within the camping and caravan sector new structures to provide sleeping and holiday accommodation are continually evolving. Paragraph 5.315 provides a definition of 'glamping' and refers to a degree of locational permanence, scale and design which could equally be applicable to chalets. The addition of the following sentence at the end of paragraph 5.315 of the Deposit Plan will help to clarify how chalets will be considered: *"Chalets are also pre-erected on site and have a range of styles. The degree of permanency and type of building materials will determine whether such structures are considered under this policy or under Policy GN 58 Self-Catering Accommodation."*
13. **Representations 4387/9 and 4388/10:** The inclusion of the 400m distance in paragraph 5.3.19 helps to define what is meant in the Policy by the term 'adjacent to a Service Village, a Service Centre or a Town'. The inclusion of the 400m for extending sites provides a degree of flexibility regarding the locational requirement, compared with new sites (to be within or adjacent to larger Settlements), to acknowledge their pre-determined location, but also seeking to maintain the sustainable strategy and settlement hierarchy. This can be clarified by amending the sentence in paragraph 5.3.19 to read: *"Proposals that would result in a medium or large site area must be within or adjacent (within 400m) to a settlement, consistent with the sustainable strategy and settlement hierarchy of the Plan...."*

#### **Policy GN 58 Self-Catering Accommodation**

14. The representation seeks amendment to Policy GN 58 (Self-Catering Accommodation) to allow self-catering accommodation to be permitted at established tourist accommodation locations; to allow the development of lodges at established tourist accommodation locations;

and the siting of lodges within the countryside. The Policy seeks to direct new self-catering accommodation to larger towns and villages which are more able to absorb this type of visitor accommodation and have a greater offer of facilities available to help reduce the need to travel. In line with long-established national planning policy, new-build development to accommodate self-catering properties in the countryside is strictly controlled. The effect of allowing exceptions for lodges would significantly undermine the policy, conflict with national planning policy and the sustainability credentials of LDP2, particularly as defining 'lodges' would be difficult and create potential for any new-built self-catering accommodation to be considered as such through the planning application process. The Council considers that the suite of policies relating to visitor accommodation provides an appropriate framework for considering future development without the changes suggested in this representation.

15. The first sentence of Policy GN 58 (Self-Catering Accommodation) should not contain the words 'Local Village'. This is a drafting error. The Policy will need to be amended to exclude the words 'Local Village'.

16. **Representations 4387/9 and 4388/10:** See above under Policy GN 56 Caravans, Camping and Chalet Development regarding a definition of 'chalet'. It is not considered that any changes to Policy GN 58 Self-Catering Accommodation are required.

Recommendations		Focussed Change/Edit Ref
A.	Insert the following definition after the first sentence of paragraph 5.311 of the Local Development Plan: <i>"Landscape capacity is the amount of change that a landscape character area can accommodate without adverse changes to the character or key characteristics or undue consequences for the achievement of landscape policies in the area. It takes into account existing development within the area as well as the landscape sensitivities and considers potential cumulative effects at a strategic level."</i>	FC5.GN56.03
B.	Insert the following sentence at the end of paragraph 5.315 of the Local Development Plan: <i>"Chalets are also pre-erected on site and have a range of styles. The degree of permanency and type of building materials will determine whether such structures are considered under this policy or under Policy GN 58 Self-Catering Accommodation."</i>	FC05.GN56.01
C.	Amend the 3 <sup>rd</sup> sentence of paragraph 5.319 of the Local Development Plan as follows: <i>"Proposals that would result in a medium or large site area must be within or adjacent (within 400m) to a settlement, consistent with the sustainable strategy and settlement hierarchy of the Plan...."</i>	FC05.GN56.02
D.	Delete the words 'Local Village' from the first sentence of Policy GN 58 (Self-Catering Accommodation).	FC05.GN58.01

## Supplementary Planning Guidance: Caravan, Camping and Chalet Landscape Capacity Assessment

### LDP and Other Document References

Supplementary Planning Guidance: Caravan, Camping and Chalet Landscape Capacity Assessment

Summary of Issues	Raised By	Name
i) Support for the SPG/no adverse comments. The SPG provides helpful guidance for applicants and decision makers and ways to mitigate the impact of existing and new development.	2724/1 4379/1 34774/1 4380/1 1556/1 1470/1 4388/2 4387/2	St Dogmaels Community Council T Cormack St Davids City Council Natural Resources Wales Carew Community Council Mathry Community Council Pembrokeshire Haven Leisure (Agent Lichfields) PRL Partnership (Agent Lichfields)
ii) Whilst there are coal mining features present across Pembrokeshire, the Coal Authority has no specific comments to make on the SPG.  Please be aware of the National Gas high pressure pipeline when considering proposals for Caravan, Camping and Chalet development.  It is important that any development close to level crossings takes into account public safety and does not interfere with the safe and effective operation of the crossing. Planning authorities are required to consult Network Rail where proposals have potential to impact level crossings.	2841/1 4339/1 1545/1	The Coal Authority National Gas Network Rail
iii) The Landscape Character Areas should be retained or expanded. Landscape and habitat loss is a serious concern, along with the growth of intensive farming practices. It is important to preserve and protect areas important for habitat and wildlife which are intrinsic to the landscape character.	4445/1 4445/2	C Heathcote C Heathcote
iv) Formatting error relating to paragraph numbers on pages 16 and 17 needs to be rectified.	1	PCC Planning
v) The data used in the SPG is pre-2019. Post Covid lockdown there has been a significant increase in Certificated Sites and pop-up sites. The SPG requires updating and it needs to be made clear that the 2019 assessment does not necessarily mean	4446/1 4380/1 4388/8 4387/8	P Davies Natural Resources Wales Pembrokeshire Haven Leisure (Agent Lichfields) PRL Partnership (Agent Lichfields)

Summary of Issues	Raised By	Name
that capacity still exists. Sites should be reviewed on a case-by-case basis.		
vi) All new developments should be located near or within existing large settlements which can absorb new demand and have services available for visitors. Impact would be less in areas of high population.	4445/3 4445/4	C Heathcote C Heathcote
vii) Consideration needs to be given to the impacts of developments on rural communities in terms of water supply, amenity of residents, lighting, increased traffic, noise etc.	4445/4	C Heathcote
viii) Tourism trends should be considered when assessing new sites. It shouldn't be assumed that there is demand for every new site proposed.	4445/5	C Heathcote
ix) Available landscape capacity should not provide an automatic green light for new caravan sites.	4379/1	T Cormack
x) It is important that the role of the SPG is fully understood as the emerging LDP is examined. The purpose of the SPG needs to be made explicit at the start of any adopted SPG so that it clear to all who will be using it.	4388/1 4387/1 4388/11 4387/11	Pembrokeshire Haven Leisure (Agent Lichfields) PRL Partnership (Agent Lichfields) Pembrokeshire Haven Leisure (Agent Lichfields) PRL Partnership (Agent Lichfields)
xi) The role of the SPG is restrictive in terms of assessing the acceptability of a proposal at site level. Every application should be determined on an individual basis and not refused because of categorisation at Landscape Character Area level. The SPG must not be used as the decision-making tool to determine if a new, upgraded or extended site is acceptable or not. The SPG should only contain advice and guidance. Table 6 must not provide a black and white answer in the context of Policy GN 56 (Caravan, Camping and Chalet Development). Table 6 is not a helpful tool in looking at what could be achieved at site level.	4388/3 4387/3 4388/4 4387/4 4388/12 4387/12 4388/13 4387/13 4388/16 4387/18	Pembrokeshire Haven Leisure (Agent Lichfields) PRL Partnership (Agent Lichfields) Pembrokeshire Haven Leisure (Agent Lichfields) PRL Partnership (Agent Lichfields) Pembrokeshire Haven Leisure (Agent Lichfields) PRL Partnership (Agent Lichfields) Pembrokeshire Haven Leisure (Agent Lichfields) PRL Partnership (Agent Lichfields) Pembrokeshire Haven Leisure (Agent Lichfields) PRL Partnership (Agent Lichfields)
xii) Paragraph 4.4 of the SPG recognises the need for sites to be considered on an individual basis, but this needs to made clear in both Policy GN 56	4388/5 4387/5	Pembrokeshire Haven Leisure (Agent Lichfields) PRL Partnership (Agent Lichfields)

Summary of Issues	Raised By	Name
(Caravan, Camping and Chalet Development) and a new introduction to the SPG		
xiii) Table 2 (Assessment Methodology) refers to criteria being developed for the National Park Study and therefore some relate to elements only occurring in the National Park. The SPG should relate solely to PCC's area of planning jurisdiction.	4388/6 4387/6	Pembrokeshire Haven Leisure (Agent Lichfields) PRL Partnership (Agent Lichfields)
xiv) The language used in paragraph 3.1 is an opinion creating a judgement that caravans are unacceptable, even though there are other developments which are also highly visible in Pembrokeshire. The language reinforces a negative starting point towards static caravan development.	4388/7 4387/7	Pembrokeshire Haven Leisure (Agent Lichfields) PRL Partnership (Agent Lichfields)
xv) A definition of 'chalet' is required to be clear that the SPG is relevant to a particular development.	4388/9 4387/9	Pembrokeshire Haven Leisure (Agent Lichfields) PRL Partnership (Agent Lichfields)
xvi) Table 6 (Landscape Character Areas – Capacity) should be used on the individual Landscape Character sheets for ease of reference.	4388/10 4387/10	Pembrokeshire Haven Leisure (Agent Lichfields) PRL Partnership (Agent Lichfields)
xvii) With reference to LCA21 (Penally) the boundary cuts through Kiln Park Holiday Park. It is clear that the LCA boundaries have been artificially created at a national level and would not have been defined in the same way if done at a local level. This highlights that capacity assessments undertaken at a character area level cannot recognise development opportunities at an individual parcel level. Kiln Park has been a feature of this part of Pembrokeshire for a long time and proposals need be considered for specific parcels of land and assessed in the light and the nature of the development and its design.	4388/14 4388/15	Pembrokeshire Haven Leisure (Agent Lichfields) Pembrokeshire Haven Leisure (Agent Lichfields)
xviii) With reference to LCA 20 (Jeffreyston Lowlands) – this is too large an area to reach judgements on individual sites. The immediate and local context must be taken into account on a case-by-case basis. Use of the term 'around New Hedges' gives little accuracy or transparency. PRL Partnership would not consider this to extend as far as Crane Cross (1km away). The 'moderate' capacity for development is welcomed but should be a starting point for the consideration of planning applications. PRL Partnership objects to the	4387/14 4387/15 4387/16 4387/17	PRL Partnership (Agent Lichfields) PRL Partnership (Agent Lichfields) PRL Partnership (Agent Lichfields) PRL Partnership (Agent Lichfields)



Summary of Issues	Raised By	Name
<p>limitation of existing sites beyond existing boundaries. This LCA is too broad an area to reach such a restrictive conclusion. Development must be considered on a site-by-site basis.</p> <p>The inclusion of statements such as 'Pods or glamping tents may be considered instead of static caravans...' are unclear. There are many ways to deliver change within existing sites and a range of these can be acceptable.</p>		
<p>xix) With reference to LCA 19 (Narberth and Lampeter Vale) – agree with the assessment that some parts of the LCA have reached capacity. The assessment is the best basis for decisions about new or extensions to existing caravan sites. LDP2 Tourism Policy should acknowledge the greater space needed by static caravans and lodges with potential to impact negatively on the enjoyment of the National Park.</p>	4380	Cllr A Cormack
<p>xx) With amendments to strengthen the emerging SPG to ensure its role is transparent, it has potential to be a robust material consideration for applications determined under emerging Policy GN 56 (Caravans, Camping and Chalet Development). Further consultation on the SPG is suggested prior to its adoption.</p>	4388/16 4387/18	Pembrokeshire Haven Leisure (Agent Lichfields) PRL Partnership (Agent Lichfields)

Response
<ol style="list-style-type: none"> <li>1. Support for the SPG is noted and welcomed.</li> <li>2. The need to consider coal-mining features, high-pressure gas pipelines and level crossings is noted. These are matters that will be considered on a case-by-case basis through the planning application process. No changes to the Plan are required.</li> <li>3. The need to preserve and protect areas important for habitat and wildlife is agreed and noted. It is considered that the SPG will support the policies of LDP2 in achieving this.</li> <li>4. Formatting error noted. It is recommended that paragraph numbers on pages 16 and 17 are correctly numbered.</li> <li>5. Agree that the camping and caravanning sector has changed following the Covid-19 pandemic and throughout Pembrokeshire an increasing number of landowners are taking advantage of the Permitted Development rights available to operate camping sites without the grant of planning permission. The nature of such sites operated through organised clubs (Certificated Sites) and 28-day use of land is erratic and often unpredictable and outside the scope of the LDP and SPG. The SPG has identified the location of sites with planning permission and those operating under exemption certificates at a given time which matches the base date of the Plan. The intention of the SPG is to provide a detailed description of the landscape in each defined area and to set out broad requirements on how new sites can be</li> </ol>

integrated into the landscape for applicants and the planning authority. As is always the case, each planning application will need to be considered on its individual merits and any changes in the number and type of camping and caravan sites in the vicinity will need to be taken into account at that time.

6. Policy GN 56 of Deposit LDP2 directs larger new caravan, camping and chalet developments to locations close to larger settlements. This is not a matter for the SPG.
7. These are matters that are normally considered as part of the planning application process. The policies of LDP2 and this SPG will provide a full context for considering such matters in relation to proposals for caravan, camping and chalet development.
8. Planning applications are considered within the context of national and local planning policy which takes into account longer-term trends, strategies and plans. There are no changes that can be made to the SPG to meet the amendments requested in this representation.
9. Agree. There are many considerations that need to be taken into account when determining a planning application.
10. The explanatory note published for Consultation alongside the SPG provides a full explanation of purpose of the SPG. No further explanation is considered necessary.
11. The Council considers that the SPG is intended to provide advice on a Landscape Character Area basis as to whether the landscape has capacity to accommodate additional camping, caravan and chalet accommodation based on a systematic assessment of the whole Plan area. It provides information about the landscape character elaborating on the requirements set out in Policy GN 56 (Caravan, Camping and Chalet Development) to assist in ensuring all new sites and site extensions are in acceptable locations in landscape terms. It is acknowledged within the SPG ( Paragraph 2.10) that *"...there is a spectrum of effects from different types of development on different sites.....The effects of individual developments would need to be demonstrated on a case by case basis."* The Council considers that the SPG supports Policy GN 56 (Camping, Caravan and Chalet Development) by provided detailed landscape character descriptions, landscape capacity and possible mitigation.
12. All planning applications are determined on their individual merits as a matter of course. The SPG makes this point clearly. As this comment relates to the SPG no changes can be made to the LDP 2 which is subject to a separate consultation process.
13. Review of the document finds that all of the stated features are present throughout Pembrokeshire. A more effective response to this representation would be to amend the sentence before the table to read: "The criteria below were developed for the National Park study but are also relevant across the rest of Pembrokeshire."
14. Bullet point 1 under paragraph 3.1 of the SPG can be clarified by amending it to read: " Static caravans are the most highly visible form of accommodation in the camping and caravan sector" The remainder of the bullet points relate to findings of the study and contain a variety of language both positive and negative. The study considers development already in situ and in some locations the impact of static caravans in the landscape is considerable.
15. Chalets have a range of styles which makes defining them difficult. A change is proposed to Policy GN 56 (Caravan, Camping and Chalet Development) relating to how chalet development may be considered broadly as camping-type development or as a permanent building for holiday accommodation. The SPG includes reference to there being a growing



range of structures used for camping or glamping. A reference to 'chalets' could be included within the list.

16. Table 6 provides a summary of the detail set out for each landscape area. Repetition of the summary for each LCA is not considered necessary.
17. The presence of Kiln Park will have been taken into consideration in the Landscape Assessment for LCA21 (Penally). Planning applications are intended to be determined on their own merits. The SPG is intended to provide guidance on landscape sensitivities and help to direct camping, caravan and chalet proposals to suitable locations.
18. The Landscape Character Areas are not standard-sized areas but drawn to define a landscape with particular features that characterise the area. Planning applications are intended to be determined on their own merits. The SPG is intended to provide guidance on landscape sensitivities and help to direct camping, caravan and chalet proposals to suitable locations.
19. The SPG is intended for guidance. Policy GN 56 (Caravan, Camping and Chalet Development) details where new sites and extensions to sites may be considered. In all cases, each proposal will need to be considered on its merits and against the relevant policies of the Development Plan, taking into consideration the landscape guidance provided in the SPG.
20. It has been useful to publish the draft SPG alongside the deposit plan to help show how it will be used to guide proposals for caravan, camping and chalet developments. Both the LDP 2 and SPG are subject to change as a result of the consultation and examination process and therefore further consultation on the SPG will be required post adoption of LDP2.

Recommendations		Edit Ref
A.	Amend paragraph numbering 4.1 to 4.4 on pages 16 and 17 to 4.5 to 4.8	OE13
B.	Table 2 (Assessment Methodology) "The criteria below were development for the National Park study but are also relevant across the rest of Pembrokeshire."	OE14
C.	Bullet point 1 under paragraph 3.1 of the Supplementary Planning Guidance. " Static caravans are the most highly visible form of accommodation in the camping and caravan sector"	OE15
D.	Amend paragraph 6.18 of the SPG by inserting the words 'chalets and' in the first sentence as follows: " <i>...luxurious types of accommodation on offer including <b><u>chalets and</u></b></i> 'glamping'...	OE16