

Local Development Plan 2 (2017 – 2033)

Focussed Changes Consultation Report (Appendix 5 to the main Consultation Report)

For Chapter 6 of this Paper see separate schedule

October 2025

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Introduction

- i) **Chapter 1** sets out a summary of the publicity carried out for the Focussed Changes consultation.
- ii) **Chapter 2** advises regarding Delivery Agreement expectations regarding Submission dates and the Council's actions in response.
- iii) **Chapter 3** sets out the main issues raised in response to the Focussed Changes and the Council's response. A separate schedule has also been prepared with individual comments responded to the formal Focussed Changes consultation – See Chapter 6.
- iv) **Chapter 4** provides information on how late and invalid representations were dealt with.
- v) **Chapter 5** advises what the next steps are.
- vi) **Chapter 6** sets out a summary of the representations received and the responses by the Council.

Chapter 1: Publicity

- 1.1 The Focussed Changes documents were published for consultation for a six-week period between Monday 4th August and Monday 15th September 2025, including the Focussed Changes, Minor Edits, Map Booklet, Other Edits to supporting documentation and evidence and an update to the Habitat Regulations Assessment in response to representations received.
- 1.2 The Focussed Changes and accompanying documentation were placed on the Authority's website and all those on the Authority's mailing list were notified of the consultation.¹
- 1.3 A formal notice was published in the local newspaper (the Western Telegraph) in advance of the consultation period, published on 30th July 2025². A general press release was issued to the BBC, Tenby Observer, Pembrokeshire Herald and Pure West.

¹ <https://www.pembrokeshire.gov.uk/local-development-plan-review/focused-changes#:~:text=Having%20consulted%20on%20the%20Deposit,Local%20Development%20Plan%202%20start>
s. Local Development Plan Review - Focussed Changes

² <https://publicnoticeportal.uk/archive/notice/688c93dd2801ccf095113ee2> Public Notic Portal,
Pembrokeshire, Submission of Local Development Plan, Western Telegraph

Chapter 2: Methods of Engagement

2.1 The table below provides a summary of consultation on the Focussed Changes and the Submission of the Local Development Plan. It is based on the identified methods of consultation set out in section 3.25 of the Delivery Agreement.

Stage (Replacement Plan)	Steps	Who should be involved?	Methods of Involvement	Completion Target Date & Publications/Submissions	Target Met
Submission to Welsh Government and PEDW for Examination	<ul style="list-style-type: none"> • Prepare Council responses to representation on Local Development Plan 2, Deposit Plan 2 and related reports. • Further review the Delivery Agreement. • Submit all necessary documentation to Welsh Government. • Discuss definitive timings for the remaining stages with the Inspector appointed to examine. 	<ul style="list-style-type: none"> • Members • WG • PEDW 	<ul style="list-style-type: none"> • Cabinet – 2 June 2025 ³ • Council – 17th July 2025⁴ • WG – email 18th July 2025 • PEDW – email 18th July 2025 	<ul style="list-style-type: none"> • June 2025 • (Submission in part 18th July 2025) 	x July 2025 (but within 3 months slippage)

³ [Agenda for Cabinet on Monday, 2nd June, 2025, 9.00a.m. - Pembrokeshire County Council](https://mgenglish.pembrokeshire.gov.uk/ieListDocuments.aspx?MIId=6469&x=1&LLL=0) Agenda Item 10.
<https://mgenglish.pembrokeshire.gov.uk/ieListDocuments.aspx?MIId=6469&x=1&LLL=0>

⁴ [Agenda for Council on Thursday, 17th July, 2025, 10.00a.m. - Pembrokeshire County Council](https://mgenglish.pembrokeshire.gov.uk/ieListDocuments.aspx?CIId=285&MIId=6447&Ver=4&LLL=0) Agenda Item 15
<https://mgenglish.pembrokeshire.gov.uk/ieListDocuments.aspx?CIId=285&MIId=6447&Ver=4&LLL=0>

Stage (Replacement Plan)	Steps	Who should be involved?	Methods of Involvement	Completion Target Date & Publications/Submissions	Target Met
Focussed Changes Consultation	<ul style="list-style-type: none"> Public Notice. Letter and emails to consultees. Paper copies in libraries and County Hall. Evaluate the representations submitted. 	<ul style="list-style-type: none"> Public Key stakeholders Members Internal consultees City, Town & Community Councils Specific & general consultation bodies 	<ul style="list-style-type: none"> Public Notice Letter to consultees/respondents Paper copies in libraries and County Hall 	<ul style="list-style-type: none"> Focused Changes Consultation 20th July – 15th September 2025 Report on Consultation for Focussed Changes submitted to Welsh Government and PEDW by 10th October 2025 	<p>✓</p> <p>Consultation 4th August – 15th September 2025</p>

Chapter 3: Main Issues

Further Issues arising from Deposit Stage Representations

- 3.1 PCC consulted on Local Development Plan 2, Deposit Plan 2 during autumn 2024 (21st October 2024 to 16th December 2024). One of the representations received during the consultation period was from Mr. and Mrs. Doward, supporting the provisions of the Plan, specifically in the context of Ambleston village.
- 3.2 At Candidate Site submission stage (August 2018 in this case) Mr. and Mrs. Doward submitted Candidate Site 287⁵, which the Council included within the Ambleston Local Village Settlement Boundary of Local Development Plan 2, Deposit Plan 2.
- 3.3 The details of the Deposit-stage representation are recorded in Appendix (SD09) Consultation Report Appendix 2 – Representation Reports⁶, where it is referenced as a supporting representation on policy SP 10 which is consistent with the representor's submission. No explicit representation of objection was submitted at the time. The Council's response is therefore recorded as 'Support welcomed. No change required'. This is logged under reference number 34728/1 on page 117 of Appendix 2 Representations Reports.
- 3.4 Having checked the supporting representation from Mr. and Mrs. Doward, officers have noticed that as well as the supporting material there is also a request for additional land (i.e. in addition to Candidate Site 287) to be included within the Ambleston Settlement Boundary – over and above what had been previously proposed through the submission of Candidate Site 287. This is identified on a map that is attached to the representation of support. It shows a larger area proposed for inclusion beyond the settlement boundary as proposed in the Local Development Plan 2, Deposit Plan 2.
- 3.5 This new site suggestion should probably have been submitted as a separate representation on Local Development Plan 2, Deposit Plan 2, rather than incorporated into a supporting representation. The Council did not therefore specifically respond to this part of the Deposit-stage submission in its response to Council on the 17th July 2025, but on reflection it is felt that this matter needs to be brought to the Inspector's notice and that the Council response should be expanded. The Head of Planning has delegated powers to deal with matters through the Examination through a resolution of the County Council on the 17th of July 2025.⁷

⁵ <https://www.pembrokeshire.gov.uk/local-development-plan-review/candidate-sites>

⁶ <https://www.pembrokeshire.gov.uk/local-development-plan-review/submission>

⁷ <https://mgenglish.pembrokeshire.gov.uk/ieListDocuments.aspx?CId=285&Mid=6447&Ver=4&LLL=0>

Resolution (g) *That delegated powers be granted to the Head of Planning to represent the Council's position at the forthcoming Examination.*

- 3.6 It is considered that while the Candidate Site 287 proposal is of an appropriate scale and location for inclusion within the Ambleston Settlement Boundary (as per Local Development Plan 2, Deposit Plan 2), this further area of land relates less well to the village and would result in a scale of future development in the village which would be less well matched to Ambleston's Local Village classification in Local Development Plan 2, Deposit Plan 2 Settlement Hierarchy. Hence no change to the Plan is proposed in relation to this further area of land.

Focussed Changes

- 3.1 A total of 150 representations were submitted. 61 are identified as objections, 47 are identified as supporting representations and 42 are identified as comments.

- 3.2 Chapter 6 provides a summary of the representations received and the Council's response.

	Comment	Object	Support	Grand Total
Count of Support or Object	42	61	47	150

- 3.3 The table below shows the spread of representation by policy area:

Plan/Evidence/Guidance Reference	Count of PCC Plan or Document Reference
Candidate Site Register	4
Caravan, Camping and Chalet Development Draft Supplementary Planning Guidance	6
DP 1. CONTEXT AND KEY ISSUES	1
DP 2. VISION AND OBJECTIVES	2
DP Appendix 2: Housing Components and Trajectory	3
DP Glossary	1
DP GN 1 General Development Policy	21
DP GN 13 Residential Development	4
DP GN 15 Housing Mix, Second Homes and Short-term Holiday Lets, Space Standards and Requirements for Lifetime Homes Standards	5
DP GN 16 Residential Allocations	18
DP GN 19A Maesgwynne, Fishguard S/HSG/034F/LDP2/1	2
DP GN 2 Sustainable Design and Placemaking	2
DP GN 20 Local Needs Affordable Housing	3
DP GN 21 Exception Sites for Local Needs Affordable Housing	1
DP GN 22 Specialist and Supported Accommodation	1
DP GN 24 Gypsy and Traveller Site Allocations	2
DP GN 38 Safeguarding and Prior Extraction of the Mineral Resource	2
DP GN 44 Protection and Enhancement of Biodiversity	1

Plan/Evidence/Guidance Reference	Count of PCC Plan or Document Reference
DP GN 46 Coastal Change	2
DP GN 48 Green Wedges	2
DP GN 52 Protection of Open Spaces with Amenity Value	9
DP GN 56 Caravan, Camping and Chalet Development	10
DP GN 57 Site Facilities	3
DP GN 58 Self-catering Accommodation	1
DP GN 6 Development Proposals in Pre-Assessed Areas for Wind Energy (as set out in Future Wales)	1
DP GN 7 Cawdor Barracks including the former Brawdy Airfield	5
DP SP 12 Maintaining and Enhancing the Natural Environment	7
DP SP 13 Port and Energy Related Development and Celtic Freeport	2
DP SP 15 Safeguarding of existing Strategic Employment Sites	1
DP SP 17 Visitor Economy	4
DP SP 3 Affordable Housing Target	2
DP SP 4 Gypsy, Traveller and Show-people's Accommodation	1
DP SP 6 – Settlement Hierarchy – A Sustainable Settlement Strategy	3
DP SP 7 Settlement Boundaries	15
DP SP 7 Settlement Boundaries	1
SA Appendix 2: Objectives Appraisal	1
HRA	1
Grand Total	150

3.4 In terms of main issues raised through representations formally submitted the representation to flag is by Welsh Government regarding the housing allocation at Slade Lane, Haverfordwest:

FC 4480 Welsh Government	4	FC5.GN16.Haverfordwest01	DP GN 16 Residential Allocations	Haverfordwest & Merlins Bridge
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3.5 In summary the representor has provided at the close of the consultation on the focussed changes viability appraisals regarding the Slade Lane allocation in Haverfordwest. The Council has engaged a Viability Consultant and expects to be able to provide a view to PEDW on those Viability Assessments by the 17th of November 2025.

Condition Assessment for Pembrokeshire Marine SAC published by NRW in June 2025

3.6 The Council has prepared a Position Statement⁸ to set out the implications of the recently published assessment of the Marine Protected Areas in Wales, which includes Special Areas of Conservation (SACs) and Special Protection Areas (SPAs), on the 25th June 2025 by Natural Resources Wales for the Pembrokeshire Local Development Plan 2 Deposit 2.

3.7 The Council has reviewed the contents of the revised guidance and condition surveys relevant to the plan area and the Position Statement sets out in response:

- changes proposed to the Local Development Plan 2 Deposit 2 (i.e. to the wording of relevant policies of the Plan and to where the policy which deals with water quality is placed in the Plan. These recommended changes can be considered as Matters Arising Changes through the Examination process.
- how the Habitats Regulations Assessment of the Plan should be updated with this Position Statement as an Addendum.
- an outline of the proposed mitigation package the Council is commissioning consultants to undertake, along with an outline of the proposed timetable for its completion.

3.8 The Council has consulted NRW on the draft Position Statement who have advised in principle that it supports the approach taken. The Position Statement has been uploaded to the Submission web page.

Chapter 4: Late and Not Duly Made Representations

Late Representations

3.1 In the Delivery Agreement, Edition 4 (July 2024)⁹, the Council states that:

“Paragraph 3.2: The Council will be firm on its stance to deadlines and all representations must be made by the specified closing date. Acceptance of late representations is entirely at the discretion of the Council. Where a representation/submission is late, the Council will only allow it to stand where evidence is provided to show how a genuine attempt was made to submit within a deadline. Otherwise the process is delayed and those who submitted on time will be penalised.”

3.2 Those submitting late representations (2 parties) were advised that their representations were submitted beyond the deadline and were asked to provide evidence that a genuine attempt was made to submit in time.

Rep Number/Representor	Date/Time received	Outcome
FC 4470 Mr & Mrs Sherwood	00:05 16 th September 2025	Evidence of a genuine attempt to submit the

⁸ [Submission - Pembrokeshire County Council](https://www.pembrokeshire.gov.uk/local-development-plan-review/submission) <https://www.pembrokeshire.gov.uk/local-development-plan-review/submission>

⁹ Delivery Agreement – Pembrokeshire County Council <https://www.pembrokeshire.gov.uk/local-development-plan-review/delivery-agreement-including-the-community-involvement-scheme>

		response before the deadline was provided.
FC 34781 Uzmaston, Boulston & Slebech Community Council	17:59 19 th September 2025	A genuine reason was provided for the late submission, that the Council concluded was acceptable.

3.3 Both representations were included in the Consultation Report

Not Duly Made Representations

- 3.4 9 representations did not relate directly to the Focussed Changes proposed either in part or in whole. These representations are flagged as such in the Consultation Report and a commentary provided. In some instances, the commentator has already submitted a Deposit Representation on the issue so will have the opportunity to have their concerns addressed through Examination. In others the issue will already have been validly raised by another commentator and will already be before the Inspector for consideration – please see summary table below and for more detail please see Chapter 6:

Representor Number	Representor	Representor Organisation (where relevant)	Rep Number	Support or Object	Related Focused Change reference	PCC Plan or Document Reference	Location	Site Reference
FC 4083	David Ambrose		1	Object		DP GN 16 Residential Allocations	Llanstadwell	HSG/066/LDP2/1
FC 4475	L Greggain & Co Ltd		1	Object	FC5.GN 20.03	DP GN 20 Local Needs Affordable Housing	Milford Haven	S/HSG/86/LDP2/3
FC 4171	Diane Llewelin		1	Object	FC5.GN 19A. Maesgwynne.01	DP GN 19A Maesgwynne, Fishguard S/HSG/034F/LDP2/1 GN48 Green Wedges GN46 Coastal Change GN49 Landscape GN 28 Protection and Enhancement of the Historic Environment GN16 Residential Allocations	Fishguard	S/HSG/034F/LDP2/1

FC 4171	Diane Llewelin		1	Object	FC5.GN 19A. Maesgwynne. 02	DP GN 19A Maesgwynne, Fishguard S/HSG/034F/LDP2/1 GN48 Green Wedges GN46 Coastal Change GN49 Landscape GN 28 Protection and Enhancement of the Historic Environment GN16 Residential Allocations	Fishguard	S/HSG/034F/LDP2/1
FC 4467	Pauline & Neil Clarke		1	Object		DP GN 16 Residential Allocations	Llanstadwell	HSG/066/LDP2/1
FC 3914	Adrian Harbord		2		FC4.SP0 7.Llanteg .etc.02	DP SP 7 Settlement Boundaries	Llanteg & Llanteglos	Candidate Site 221
FC 2176	Jane Clark-Davies	Llanstadwell Community Council	1	Object		DP SP 6 – Settlement Hierarchy – A Sustainable Settlement Strategy	Llanstadwell	HSG/066/LDP2/1
FC 34781	Uzmaston Boulston & Slebech Community Council		1				Uzmaston	

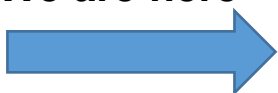
FC 4485	Ann Lankshear, Fiona Harries, Mark Ferrier, Simon Ferrier, Chris Lankshear		1	Object	FC5.GN 24.01	DP GN 24 Gypsy and Traveller Site Allocations	Pembroke	GT/095/LDP2/2
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Chapter 5: Next Steps

5.1 The table below identifies the stages in the process and at what stage plan preparation is currently at.

Key stage	Definitive and indicative timings
Review Report	Preparation started in May 2017, with the document published for informal consultation in November 2017, alongside the Delivery Agreement.
Delivery Agreement	Preparation started in May 2017, with the document published for formal consultation in November 2017.
Preferred Strategy	Preparation started in July 2018; the document was published for formal consultation by December 2018.
1st Deposit	Preparation started in April 2019, the document was published for formal consultation January 2020.
Delivery Agreement	Latest iteration approved by Welsh Government July 2024.
2nd Deposit	The document was published for formal consultation October 2024.
Submission to Welsh Government	By August 2025 18 th July 2025 in part By 10 th October 2025 in part
Focussed Changes consultation & Report of Consultations	August – October 2025
Examination	Between October 2025 and September 2026
Adoption	Spring 2027

We are here



Chapter 6 Focussed Changes Representations Schedule

See separate schedule.