

Preliminary Questions – Examination
Pembrokeshire County Council Local Development Plan 2

Please note there is a separate document Appendix A Derisking Checklist

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1. Delivery Agreement, Wellbeing & Future Generations Act, Equality Act

Has the Development Plan (DP) been prepared in accordance with the requirements of:

A) The approved Delivery Agreement, including the Community Involvement Scheme?

- 1.A.1. The Delivery Agreement, including the Community Involvement Scheme, is a key document in the production of the Local Development Plan (LDP). It sets out the timetable for Plan preparation, the ways in which the Authority will consult on the Plan (the Community Involvement Scheme element) and the resources that the Authority will dedicate towards Plan production.
- 1.A.2. Pembrokeshire County Council has prepared four editions of its Local Development Plan 2 (LDP 2) Delivery Agreement. In each case, these Delivery Agreements have been endorsed by Welsh Government. A brief summary of the history behind this is presented below.
- 1.A.3. **The Delivery Agreement (Original)** was prepared in 2017 and was subject to a formal public consultation between 9th November 2017 and 5th January 2018. A report of consultations, detailing responses received, was considered by Pembrokeshire County Council's Cabinet on 19th March 2018. Pembrokeshire County Council resolved at Full Council on the 10th May 2018 to formally submit the document to Welsh Government. It was subsequently endorsed by Welsh Government on 7th June 2018. This original version of the Delivery Agreement is no longer available online, but an electronic copy has been retained.
- 1.A.4. **A revised version of the Delivery Agreement (edition 2)**¹, setting out a timetable for the remainder of the process and reflecting delays as a result of the Covid-19 pandemic was considered by Pembrokeshire County Council's Cabinet on 5th October 2020. Pembrokeshire County Council resolved at Full Council on the 8th October 2020 to submit the revised Delivery Agreement to Welsh Government. Welsh Government approved the revised Delivery Agreement on 30th October 2020. This superseded the original Delivery Agreement. A Covid Impact Assessment² was also prepared and published at this time. Links to both documents are shown below.
- 1.A.5. **A further revised Delivery Agreement (edition 3)** was prepared in 2023, primarily in response to delays arising because of the publication of the Natural Resources Wales guidance on phosphate levels in riverine Special Areas of Conservation (SACs) in Wales, which affects the non-tidal elements of the Cleddau and Teifi river catchments.
- 1.A.6. This new iteration of the Delivery Agreement was considered by Pembrokeshire County Council's Cabinet on 24th April 2023 and subsequently at Full Council on the 11th May 2023. Welsh Government subsequently approved the further revised Delivery Agreement

¹ https://www.pembrokeshire.gov.uk/objview.asp?object_id=8875&language= Delivery Agreement Edition 2

² https://www.pembrokeshire.gov.uk/objview.asp?object_id=8876&language= Covid Impact Assessment

on the 20th June 2023.³ The June 2023 Delivery Agreement superseded the October 2020 version.

- 1.A.7. **A fourth revision of the Delivery Agreement (edition 4)** was required in 2024, as a consequence of unexpected delays arising from a variety of issues in relation to housing, Habitats Regulation Assessment, river water quality and the need to address accommodation needs for Gypsies, Travellers and Travelling show-people. Loss of staff from the Local Development Plan team in the early months of 2024 also contributed to the delays in moving the Plan forward.
- 1.A.8. This fourth edition of the Delivery Agreement was considered by Pembrokeshire County Council's Cabinet on 20th May 2024 and subsequently at Full Council on the 18th of July 2024. Welsh Government approval followed on the 24th July 2024.⁴
- 1.A.9. This latest edition of the Delivery Agreement remains in force and the Plan has been prepared in accordance with its contents.
- 1.A.10. Public consultation has been undertaken at each key stage of the Plan preparation process. The 1st Deposit Plan public consultation originally took place in 2020, but because of the difficulties relating to the Covid-19 pandemic and in relation to river water quality (particularly phosphate pollution) in protected rivers the Deposit Plan consultation was repeated in 2024, based on a revised Plan (Deposit Plan LDP 2).
- 1.A.11. Further details of all public consultations undertaken in conjunction with preparation of LDP 2 can be found in the Initial Consultation Report and the Consultation Report submitted.^{5 & 6}

b) The Well-being of Future Generations Act (Wales) (2015)? ✓

- 1.B.1. Yes, LDP 2 has full regard to the provisions of the Well-being of Future Generations Act 2015 and to the Well-being Goals. The Well-Being of Future Generations Act 2015 places a well-being duty on public bodies which requires all public bodies to carry out sustainable development. It puts in place seven well-being goals to support the ways in which we can achieve sustainable development. The theme of well-being and the provisions of the Well-being of Future Generations Act 2015 is considered through the SA process and reflected in the use of the Local Well-being Goals in framing the strategic objectives and the strategic policies.
- 1.B.2. The LDP 2 Vision is assessed in respect of its compatibility with the Well-Being of Future Generations Goals in the Draft Issues, Vision & Objectives 2018 document. The compatibility of the Objectives has also been considered against the Well Being

³ https://www.pembrokeshire.gov.uk/objview.asp?object_id=11224&language= Delivery Agreement Edition 3

⁴ https://www.pembrokeshire.gov.uk/objview.asp?object_id=11509&language= Delivery Agreement Edition 4

⁵ <https://www.pembrokeshire.gov.uk/local-development-plan-review/preferred-strategy> - Initial Consultation Report

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

of Future Generations goals and the Pembrokeshire Well-Being Plan priorities.⁷ Please also see the LDP 2's Deposit Plan 2 objectives link into the Well-being Goals – see Table 1, page 31 of LDP 2 Deposit Plan 2. Each strategic policy also sets out which of the Well-being Goals it meets - see *italicised* text at the end of each strategic policy.

1.B.3. The Sustainability Appraisal and the derivation of its objectives is carried out within the framework of the Act and takes account of the national legislation and policy and local assessments and policy for example the Pembrokeshire Wellbeing Assessment and the Pembrokeshire Wellbeing Plan in setting out the implications for the Sustainability Appraisal.⁸

c) The Equality Act (2010)?

1.C.1. **An Equality Impact Assessment (EqIA)**⁹ has been undertaken, which has reviewed recent evidence to provide a baseline analysis and considered the implications for LDP 2. The EqIA then assessed the potential impacts of LDP 2 upon people with protected characteristics (negative or positive). This document also assesses how the policies and proposals help to promote equality. The appropriate steps have therefore been taken to comply with the Public Sector Equality Duty Equality Impact Assessment legislation. The Assessment helps demonstrate that the Council has shown due regard to the need to reduce inequalities of outcome resulting from socio-economic disadvantage when taking strategic decisions under the Socio-economic Duty.

⁷ <https://www.pembrokeshire.gov.uk/local-development-plan-review/strategic-options> See Draft, Issues, Vision and Objective 2018 (Appendices)

⁸ <https://www.pembrokeshire.gov.uk/local-development-plan-review/sustainability-appraisal-strategic-environmental-assessment> - see Scoping Report (Appendices) APPENDIX 0b: Baseline data & Appendix 0c Plans and Programmes

⁹ <https://www.pembrokeshire.gov.uk/local-development-plan-review/equality-impact-assessment> Equality Impact Assessment webpage

2. Sustainability Appraisal ✓

Has the DP been subject to a robust Sustainability Appraisal/Strategic Environmental Assessment? Have all the ‘likely significant environmental effects’ of the Plan and all ‘reasonable alternatives’ been identified, described and evaluated? ✓

- 2.1. Local Development Plan 2’s accompanying SA Report (incorporating SEA)¹⁰ assesses the likely sustainability and significant environmental effects of all substantive components within the Plan (strategy, policies, site allocations, etc.) and identified reasonable alternatives. This builds directly upon previous SA reporting including an SA Scoping Report (2018) and the Initial Sustainability Appraisal of the Preferred Strategy.
- 2.2. Paragraphs 1.10 to 1.21 provide a useful summary of the work undertaken in choosing the Preferred Strategy and how the various options performed. 13 growth options were considered and the preferred growth option chosen (Preferred Option 13) provides a balanced approach in terms of impacts (see paragraph 1.16). The chosen option for spatial distribution of growth (Option 2) was the most positive scoring of the options without any negative impacts identified.
- 2.3. Paragraphs 1.22 to 1.62 provide a useful summary of the work undertaken in appraising the LDP2 Deposit 2 including allocations.
- 2.4. The SA Report demonstrates how the SA, incorporating SEA, process has informed the development of LDP 2, including the incorporation of recommended changes to policy wording. As a result, the SA Report concludes that there is good coverage of all key sustainability issues in the Plan, with plan components performing well against the SA Framework.
- 2.5. Paragraph 1.24 of the Sustainability Appraisal advises that the overall impact of the vision is generally positive.
- 2.6. In terms of objectives paragraph 1.25 advises that the objectives of the Plan again perform generally in a positive manner. Issues that stand out (in terms of potential negative impacts) are highlighted, are limited in nature, and mitigation is identified.
- 2.7. Similarly for strategic policies potential negative impacts are also limited in number and mitigation identified – paragraph 1.32.
- 2.8. The 60 General policies are grouped into Placemaking, Living and Working, Resourceful Communities, Tackling Rurality, Environment Policies and Allocations.
- 2.9. For Placemaking potential negative impacts are limited. For the Placemaking policies the main areas of tension are limited to potential impacts on the landscape for renewable energy and in terms of impacts on the historic environment. The use of criteria-based policies and site selection should assist with mitigation where necessary. Policy GN 5 Renewable Energy allocations is appraised separately.

¹⁰ <https://www.pembrokeshire.gov.uk/local-development-plan-review/sustainability-appraisal-strategic-environmental-assessment> Sustainability Appraisal webpage

- 2.10. For Living and Working policies impacts are generally positive. Mitigation is identified for negatively performing policies (limited in number) against specific sustainability objectives. (see paragraph 1.37).
- 2.11. For the Resourceful Communities policies, a generally positive set of impacts are identified with mitigation identified and addressed in terms of Policy GN 31 Town Centre development and flooding. Mitigation for Policy GN 32 Out of Centre Retail and Commercial Development is not feasible as this policy is framed to reflect national planning policy so that a sequential approach is taken and the least preferred location (which would be the least sustainable) can only be selected when the criteria of the policy are fully met. It is not considered that any mitigation is feasible for this policy as it would be difficult to instigate sustainable travel options.
- 2.12. Tackling Rurality policies show a generally positive scoring against the sustainability objectives. For those limited instances where potential negative impacts are identified mitigation opportunities are limited.
- 2.13. Environment policies have had a predominantly positive scoring with particular mitigation issues identified in paragraph 1.40 in relation to self-catering (Policy GN 58), and waste (Policy GN 59 and Policy GN 60).
- 2.14. Where development on allocated sites is likely to have adverse impacts, the site allocation policies/supplementary planning guidance of the Local Development Plan would need to include mitigation measures to minimise or obviate those impacts (see paragraph 1.42 to 1.45).
- 2.15. Overall, the Sustainability Appraisal does not identify likely significant adverse effects taking account of the mitigation proposed. The Sustainability Appraisal has been carried out as an iterative and transparent process whereby opportunities to improve the sustainability performance of the Plan have been improved through choice of option or through mitigation.

3. Habitats Regulations Assessment ✓

3. Has the DP been subject to a robust Habitats Regulations Assessment? Where 'likely significant environmental effects' have been identified, has an adequate Appropriate Assessment (AA) been undertaken?

- 3.1. The Deposit Plan 2, has been subject to Habitats Regulation Assessment (HRA) in accordance with statutory requirements. This documented the findings of an Appropriate Assessment carried out to identify any likely significant effects on the integrity of European Sites in the context of their conservation objectives. The HRA concluded that the Deposit LDP 2 is not likely to have significant effects on any of the identified European sites, either alone or in combination with other plans or projects.
- 3.2. The policies, proposals and measures incorporated into the LDP 2 are considered appropriate to sufficiently protect European sites from development contained within the Plan.
- 3.3. The Council received representations on the Habitats Regulations Assessment during the Deposit Consultation. The Council responded to those comments as set out in the Council's Issues Report.¹¹ The Council published a Focussed Changes consultation which included the opportunity to comment on the proposed changes to the wording of the Habitats Regulations Assessment in response to representations received.¹²
- 3.4. The Council has also invited Natural Resources Wales to provide comment on a Position Statement in relation to the Conditions Assessment published in June 2025 regarding the Pembrokeshire Marine SAC. The Council had a meeting with NRW on the 24th of September 2025. NRW supported the approach in principle and the Statement has been uploaded to the submission webpage.¹³
- 3.5. The purpose of this Position Statement is 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 25 June 2025 by Natural Resources Wales for the Pembrokeshire Local Development Plan 2.
- 3.6. **Conclusion:** The Council has reviewed the contents of the revised guidance and condition surveys relevant to the plan area and the Council's Position Statement¹⁴ sets out in response:
- changes proposed to the Local Development Plan (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.

¹¹ <https://www.pembrokeshire.gov.uk/local-development-plan-review/submission> see Consultation Report Appendix 4 Issues Paper section 4.7 Habitats Regulations Assessment.

¹² <https://www.pembrokeshire.gov.uk/local-development-plan-review/focused-changes>

¹³ [Submission - Pembrokeshire County Council https://www.pembrokeshire.gov.uk/local-development-plan-review/submission](https://www.pembrokeshire.gov.uk/local-development-plan-review/submission) see ref SD 12

¹⁴ [Submission - Pembrokeshire County Council https://www.pembrokeshire.gov.uk/local-development-plan-review/submission](https://www.pembrokeshire.gov.uk/local-development-plan-review/submission) see ref SD 12

- 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.

4. Significant Changes since publication of the Deposit Plan ✓

4. Have there been any significant changes in national policy or local circumstances since the DP was placed on deposit? If there have, what are the implications of these changes for the Plan? Do they need to be addressed through the preparation of new evidence and/or revisions to the Plan? What is the intended timescale for this work?

Policy Topic Area (alphabetical order)	Title of Document/Link	Implications/Summary
Biodiversity	Environment (Principles, Governance and Biodiversity Targets) (Wales) Bill ¹⁵	A good summary is provided in the link below. This Bill is currently (July 2025) just at the first stage of its legislative journey. The next step will be a Sennedd-wide debate, followed by a detailed line-by-line consideration in committee. Implications for local authorities include the need for local action, with councils and communities expected to be given the tools to implement meaningful change on the ground. Conclusion: This emerging legislation cannot be taken into account at this point. Its implications will need to be considered in due course. Currently, the Bill is undergoing Stage 1 of Senedd scrutiny with Royal Assent expected in April 2026. No change is needed at this point.
Dark Skies	Good practice guidance: planning for the conservation and	Good practice guidance: planning for the conservation and enhancement of Dark Skies in Wales has been developed by the Dark Skies Working group and published by Welsh Government in February 2025. The document provides a national approach to planning for dark skies, taking account of the legislative and strategic planning context at a national level.

¹⁵ <https://www.localgovernmentlawyer.co.uk/environment/767-environmental-features/61612-the-environment-principles-governance-and-biodiversity-targets-wales-bill-the-key-provisions>
<https://laiddocuments.senedd.wales/pri-ld17199-en.pdf>

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	enhancement of dark skies in Wales ¹⁶	It is proposed to update Criterion 10 and supporting paragraph 5.16 of Policy GN.1 (General Development Policy) to reflect the published guidance to better support the implementation of national planning policy for lighting in Section 6.8 of Planning Policy Wales (Ed. 12) and Policy 9 (Resilient Ecological Networks and Green Infrastructure) of Future Wales: the national plan 2040. An amendment is also proposed to Appendix 3: Supplementary Planning Guidance. <u>GN.1 General Development Policy</u> Development will be permitted where the following criteria are met: ... 10) Any light pollution must be necessary and fully justified and proposals with significant light pollution must include a lighting scheme. Proposals must minimise their light impact through appropriate mitigation wherever possible; <u>10) It is demonstrated that there will be no unacceptable adverse effects on biodiversity, amenity, local character or quality caused by external lighting. Where lighting is necessary, appropriate justification and evidence should be provided to ensure the impact of any lighting is minimised and of an acceptable style/design for the site. Proposals with significant levels of external lighting must include a full lighting scheme;</u> Paragraph 5.16 Light pollution can have a significant adverse effect on key protected species and sites and should therefore be minimised. Lighting should be appropriate to the surroundings and character of the whole area, not just the site, and should aim to minimise light disturbance. Any light pollution created as part of a development must be necessary and justified, for example on the basis of security concerns, <u>and where proposals have a significant impact, they must include a full lighting scheme and mitigation proposals. Light can adversely</u>

¹⁶ <https://www.gov.wales/dark-skies-guidance>

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		<u>affect a sense of place, with cumulative impacts affecting landscape settings. Guidance notes on appropriate lighting design and mitigation measures have been published in Good Practice Guidance: Planning for Conservation and Enhancement of Dark Skies in Wales (February 2025). will be produced and will include mitigation opportunities. The Biodiversity SPG provides guidance on how lighting can impact on important and protected species. There may be an opportunity to prepare joint SPG on Lighting and Dark Skies, working collaboratively with the Pembrokeshire Coast National Park Authority.</u> <u>Appendix 3: Supplementary Planning Guidance</u> GN 1 General Lighting and N Y Working with PCNPA Development Dark Skies collaboratively. Policy Section 1.4 of the Good Practice Guidance ‘Security and Crime’ explains that there is little evidence to suggest that security lighting prevents crime. The suggested removal of security as justification for lighting in paragraph 5.16 will encourage a better approach to lighting on sites that require security measures. The extensive and thorough advice provided in the Good Practice Guidance currently negates the need for Supplementary Planning Guidance on lighting and dark skies to be produced to support Local Development Plan 2 Deposit 2. Therefore, references to this piece of SPG are proposed to be removed. Conclusion: It is recommended that the LDP 2 Plan text be updated to reflect this newly published national guidance as a Matter Arising Change.
Dissolved Inorganic Nitrogen (DIN) in the Marine SACs.	Updated NRW Conservation Advice Packages (Regulation 37) and the Condition Assessment for the marine Special Areas of Conservation (SAC) and	Further work has recently been completed by NRW (June 2025), contributing to Welsh Government’s Nature Networks Programme to improve the condition, connectivity and resilience of protected sites. Links to the various Condition Assessments for Welsh European marine sites and the associated Conservation Advice Packages are shown below. The latter have been put in place to help Wales meet the obligations of the Conservation of

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	Special Protection Areas (SPAs) located entirely in Wales. The joint NMB is preparing Nutrient Management Plans for the Teifi, Cleddau and Tywi catchments in West Wales. These are almost ready for publication. NRW is leading the Teifi Fyw project, which is putting together a National Lottery Heritage Fund bid for an innovative approach to river water quality issues in the Teifi catchment – this is ongoing work. Welsh Government Planning Policy Statement – Development in SAC Rivers, June 2025 and the associated DTA Ecology Welsh Government Planning	Habitats and Species Regulations 2017 (the Habitats Regulations). They have significant implications for land use planning in affected areas. Natural Resources Wales / Condition assessments for Welsh European marine sites (EMS) condition-assessment-for-pembrokeshire-marine-sir-benfro-forol-sac.pdf condition-assessment-for-carmarthen-bay-and-estuaries-sac.pdf condition-assessment-for-cardigan-bay-sac.pdf condition-assessment-for-carmarthen-bay-spa.pdf condition-assessment-for-grassholm-spa.pdf Natural Resources Wales / Conservation advice for European marine sites (Reg 37) conservation-advice-for-carmarthen-bay-spa.pdf conservation-advice-for-grassholm-spa.pdf conservation-advice-for-sir-benfro-forol-pembrokeshire-sac.pdf conservation-advice-for-carmarthen-bay-and-estuaries-sac.pdf conservation-advice-for-cardigan-bay-sac.pdf In a Pembrokeshire context, the condition of the Pembrokeshire Marine SAC, in particular, has been found to be unfavourable and there is a high degree of confidence in the monitoring work undertaken here – hence this is one of the

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	Guidance – Development in SAC Rivers, December 2024	Marine SACs being prioritised for remedial actions, although further technical work is needed to better understand the nature of the problem. Currently, NRW is not advising that nutrient neutrality should be applied as a blanket approach across the marine SACs in Wales. However, it is asking for nutrient neutrality in some of the Water Framework Directive sub-catchments, including the Milford Haven Inner sub-catchment and areas draining into this, which include the upstream freshwater SAC catchment of the Western and Eastern Cleddau. NRW's advice on this matter (taken from their website and dated 6th August 2025) is reproduced below – purple text: (NRW) Marine SAC interim advice Our marine SACs have a number of ecological features designated for environmental protection including estuaries, coastal lagoons, large shallow inlets and bays and mudflats/sandflats that are sensitive to high levels of nutrients. We released condition assessments and conservation advice for our marine SACs in June 2025. The updated condition assessments have concluded that nutrient sensitive features at some sites are in unfavourable condition for both chemical (Dissolved Inorganic Nitrogen [DIN]) and biological (phytoplankton and opportunistic macroalgae) indicators of nitrogen enrichment. High concentrations of nitrogen in the water column at these features can cause phytoplankton and opportunistic macroalgae blooms leading to adverse ecological effects. These effects include reduced dissolved oxygen availability, especially in warmer

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		months, and lethal and sub-lethal impacts on sensitive fish, epifauna and infauna communities. Water bodies in marine SACs where features are in unfavourable condition due to current evidence of both chemical and biological failure are: • Milford Haven Inner (Pembrokeshire Marine SAC) • Burry Inlet Inner (Carmarthen Bay and Estuaries SAC) • Cemlyn Lagoon (Cemlyn Bay SAC) Further technical work to understand the nutrient impacts and ongoing environmental monitoring and assessment of chemical and biological failures geographically will help to inform any future revisions to the planning advice. New developments leading to an increase in nitrogen discharges directly to, or catchments draining to these sites may contribute to unfavourable condition of, or undermine measures to restore, these features. NRW advice is that: We therefore advise Planning Authorities that a conclusion of no adverse effect on site integrity may be drawn in a Habitats Regulations Assessment, where any plans or projects in these areas with the potential to increase nutrient discharges can secure appropriate mitigation and demonstrate nutrient neutrality for nitrogen. Planning Authorities may apply the screening principles set out in our SAC Rivers planning advice for types of development unlikely to increase nutrient discharges and advice on agricultural developments, domestic extensions, private treatment systems, separator toilets and permitted development. Where the intention is for a proposed development to connect to a sewer network that is located close to the boundary of the freshwater catchments for the Milford Haven Inner, Burry Inlet Inner, and Cemlyn Lagoon, the location of

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		wastewater treatment outfall should be confirmed to determine if there is a hydrological pathway for nutrient discharges to the failing marine water body. (Last updated 6 Aug 2025) PCC is in discussion with NRW, PEDW and the joint Nutrient Management Board for West Wales to assess the implications for planning. NRW will provide supporting advice on screening and assessing plans and projects in the affected areas. It wishes to ensure that decision-making is consistent, precautionary and defensible. The interim advice to LPAs is set out above, with further advice expected on planning implications in the future. In the Marine SAC areas, a major concern is the levels of Dissolved Inorganic Nitrogen in its various forms. Hence, the focus is likely to be on reducing nitrates, nitrites and ammonia in these areas. Diffuse sources (agricultural run-off, pollution incidents and private non-treated sewage) are thought to be largely responsible for this issue. NRW is developing a programme of work to tackle these issues, similar to that already put in place for the Riverine SACs. Advice and guidance will thus follow, together with the exploration of longer term / catchment scale approaches. With regard to the three Nutrient Management Plans, these are putting in place practical measures to help improve the quality of river water in the three West Wales Riverine (non-tidal) SACs – those for the Teifi, Cleddau and Tywi. Part of the Teifi catchment is in Pembrokeshire and most of the Cleddau catchment is in Pembrokeshire. Teifi Fyw is an initiative to bring forward innovative solutions to nutrient problems in the Teifi catchment. A National Lottery Heritage Fund bid is being prepared currently.

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		In August 2025, Welsh Government published an Interim Planning Policy Statement on Development in SAC Rivers, which links to the DTA Ecology / Welsh Government Planning Guidance on Development in SAC Rivers, December 2024, which sets out the basis of the 'fair share' approach to addressing river water quality issues arising in SAC rivers in Wales. Links to the current Welsh Government planning guidance on Development in SAC Rivers and to the Welsh Government interim planning policy statement on Development in SAC Rivers (both August 2025) are shown below: Development in special areas of conservation (SAC) rivers: planning guidance GOV.WALES Development in special areas of conservation (SAC) rivers: interim planning policy statement GOV.WALES Conclusion: The Council has reviewed the contents of the revised guidance and condition surveys relevant to the plan area and the Council's Position Statement ¹⁷ sets out in response: - changes proposed to the Local Development Plan (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.

¹⁷ [Submission - Pembrokeshire County Council https://www.pembrokeshire.gov.uk/local-development-plan-review/submission](https://www.pembrokeshire.gov.uk/local-development-plan-review/submission) see ref SD 12

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Employment	National Policy Statements for Ports – draft update 2025 ¹⁸	This is a consultation document which applies to English Ports and also to Milford Haven in Wales, which is a Trust Port. This is a significant update to the previous version of the NPS for Ports, which was published in 2012, but it will be some time until it is finalised. Conclusion: There is no timeline for finalising the updated Statement, so it cannot be taken into consideration at this point in time, with the older Statement (from 2012) remaining in force for the time being.
Flooding	Technical Advice Note 15: Development, flooding and coastal erosion ¹⁹	Publication of updated TAN 15: Development, Flooding and Coastal Erosion (31st March 2025). Uses Flood Map for Planning as the basis for defining flood risk. These maps are updated every 6 months and take into account changes due to climate change. They also introduce new 'TAN15 Defended Zones. The Flood Map for Planning has been in use since 2023 and was used alongside the former Development Advice Maps in preparing the Deposit Plan. No housing or other highly vulnerable use allocations are within flood risk zones. Some employment allocations/safeguarded sites are liable to flood risk but are brownfield sites and can be redeveloped within the context of the updated TAN15. Some updates to the explanatory text to Policy GN 1 <i>General Development</i> are required to reflect the Flood Zone categories set out in the updated TAN15, but these minor changes are descriptive only and will not change the meaning or application of the Policy: 4th sentence of paragraph 5.9 of the Deposit Plan:

¹⁸ <https://www.gov.uk/government/consultations/proposed-amendments-to-the-existing-national-policy-statement-for-ports/draft-national-policy-statement-for-ports-consultation>

¹⁹ [Technical Advice Note 15: Development, flooding and coastal erosion](#)

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		No housing allocations have been identified within €4 <u>Zone 2</u> or €2 <u>Zone 3</u> flood zones in the Plan. A small number of other allocations are located within €4 <u>Zone 2</u> or €2 <u>Zone 3</u> flood zones. Policy GN 46 <i>Coastal Change</i> of the Deposit Plan has been proposed for deletion following the publication of the updated TAN15 which fulfils the aims of Policy GN 46. (See Focussed Change FC5.GN46.01). Conclusion: These proposed changes to the Plan are recommended as Matters Arising Changes.
General	Draft Planning (Wales) Bill ²⁰	Draft Planning Bill. The link below provides useful summary of the changes proposed. The Draft Bill retains the core components of the existing plan-led system in Wales. It also codifies the duty on authorities to prepare plans and include public participation statements. Developers and consultants should familiarise themselves with the layout of the Draft Bill and the renumbered provisions that will soon replace old section references. The Welsh Government expects the bill to complete the legislative process by mid-2026, with commencement likely in late 2026 or 2027. Until then, the current law remains in force. Conclusion: This emerging legislation cannot be taken into account at this point. Changes are likely to be in relation to referencing of legislation in the LDP. No change is needed at this point.
Gypsy/Traveller	Updated Welsh Government Guidance for:	These are all consultation drafts . They may have implications for LDP provisions for gypsy and traveller accommodation in the future.

²⁰ <https://www.gov.wales/draft-planning-wales-bill>

Policy Topic Area (alphabetical order)	Title of Document/Link	Implications/Summary
	Designing Gypsy and Traveller Sites, 2025.²¹ Closing date 19 May 2025 Managing gypsy and traveller sites.²² Closing date 19 May 2025 Undertaking Gypsy and Traveller accommodation assessments.²³ Closing Date 3 June 2025 Managing unauthorised encampments.²⁴ Closing Date 3 June 2025	No timeline is provided for finalising these documents. Conclusion: This emerging guidance cannot be taken into account at this point. Changes are likely to be in relation to updating referencing to relevant guidance in the LDP where required. Also, a new Gypsy Traveller Accommodation Assessment will need to be carried out in accordance with the final version of the guidance when published. No change is needed at this point.
Historic Environment	Letter to Heads of Planning Historic Env Wales Act ²⁵	The letter provides information for Planning Authorities on implementation Historic Environment (Wales) Act 2023 – and commencement. The letter advises that <i>‘While the Acts and regulations that provide the framework for the management and protection of the historic environment will change in November (2024), it is important to stress that the policy and the effect of the</i>

²¹ <https://www.gov.wales/draft-guidance-designing-gypsy-and-traveller-sites-site-provision.html>

²² <https://www.gov.wales/updated-guidance-managing-gypsy-and-traveller-sites.html>

²³ <https://www.gov.wales/updated-guidance-undertaking-gypsy-and-traveller-accommodation-assessments.html>

²⁴ <https://www.gov.wales/draft-guidance-managing-unauthorised-encampments-understanding-unauthorised-encampments-and>

²⁵ <https://www.gov.wales/historic-environment-wales-act-2023-letter-heads-planning>

Policy Topic Area (alphabetical order)	Title of Document/Link	Implications/Summary
		<i>law will not alter.</i> Paragraph 5.148 of the Local Development Plan has already been updated (through the Focussed Changes proposals) to refer to the new Act and to remove reference to 'Ancient' in the term Scheduled Ancient Monuments (Minor Edits No. ME1²⁶). Conclusion: No further updates for the historic environment are required beyond those being taken forward as Focussed Changes.
Housing	Local Housing Market Assessment 2023 ²⁷ (March 2025) formally made public July 2025.	References to the 2023 Local Housing Market Assessment will need to replace those where the earlier version is referred to in the LDP 2. - At paragraph 3.6 of LDP 2 change the reference from 2022 to 2023 as paragraph 6.13 and 6.16 of the Local Housing Market Assessment 2023 use the same statistics. - At paragraph 4.11 bullet 3 of LDP 2 change the reference from 2022 to 2023 as the Local Housing Market Assessment 2023 also identifies a significant backlog of housing need. - At paragraph 4.14 a focussed change (FC4.SP03.01) is proposed to provide details of the annual requirement for affordable housing need. This is taken from the Local Housing Market Assessment 2023. No further change is required beyond referencing the Local Housing Market Assessment as being in its final form. - At paragraph 5.99 the Local Housing Market Assessment 2021 is referenced twice (as a Focussed Change FC5.GN15.01) which requires an update.

²⁶ <https://www.pembrokeshire.gov.uk/local-development-plan-review/focused-changes>

²⁷ https://www.pembrokeshire.gov.uk/objview.asp?object_id=11794 = Pembrokeshire Local Housing Market Assessment 2023

Policy Topic Area (alphabetical order)	Title of Document/Link	Implications/Summary
		○ In the first part of paragraph 5.99 of LDP 2 the reference to the Local Housing Market Assessment needs to be updated to 2023. The requirement for adaptable homes changes to 11,158 and the percentage changes to 18.3%. These changes are not substantive and do not alter the overall policy framework of the Plan. ○ At the end of paragraph 5.99 the reference needs to be updated to reference the 2023 Local Housing Market Assessment. The paragraph reference from the Local Housing Market Assessment is now 6.16 and the percentage figure is 4.1%. The figure of 2425 remains unchanged. Again, these changes are not substantive in nature. ▪ At paragraph 5.124 update the reference to the Local Housing Market Assessment to 2023 both in the text and the footnote. Conclusion: Minor updates to the Local Development Plan are needed to reflect this new publication. It is recommended that these are published as Matters Arising Changes.
Minerals	See above for the draft Planning (Wales) Bill (see item above)	To note that this topic area is one that is being addressed by the draft Planning (Wales) Bill (see item above). The intention is that consolidation will result in clearer legislation that is easier to navigate and is more accessible on the topics of minerals and waste.²⁸ Conclusion: No change is needed.
Protecting trees and woodlands	See above for the draft Planning (Wales) Bill (see item above)	See above for the draft Planning (Wales) Bill (see item above) The Planning Bill will include the new system for the preservation of trees and woodlands that was introduced by the Planning Act 2008, but has yet to be

²⁸ <https://www.gov.wales/sites/default/files/publications/2025-06/draft-planning-wales-bill-cover-document.pdf> - see paragraph 43

Policy Topic Area (alphabetical order)	Title of Document/Link	Implications/Summary
		brought into force in Wales. This simplifies the procedure for making orders and carrying out works, whilst retaining the existing level of protection. It will require a new set of regulations that are currently being developed; it is expected these will come into force at the same time as relevant provisions in the Bill if passed by the Senedd. ²⁹ Conclusion: No change at this point.
Renewable Energy	N/A	No updates
Retail	N/A	No updates
Second Homes	N/A	No Updates
Telecomms	N/A	No Updates
Transport	N/A	No updates
Visitor Economy	N/A	No updates.
Waste	To note that this topic area is one that is being addressed by the draft Planning (Wales) Bill (see item above).	To note that this topic area is one that is being addressed by the draft Planning (Wales) Bill (see item above). The intention is that consolidation will result in clearer legislation that is easier to navigate and is more accessible on the topic of minerals and waste. ³⁰ Conclusion: No change at this point.
Welsh Language	N/A	No Updates

²⁹ <https://www.gov.wales/sites/default/files/publications/2025-06/draft-planning-wales-bill-cover-document.pdf> - see paragraph 42

³⁰ <https://www.gov.wales/sites/default/files/publications/2025-06/draft-planning-wales-bill-cover-document.pdf> - see paragraph 43

5. Compatibility of the Strategy with.. ✓

Is the DP strategy consistent/compatible/in conformity with:

A. National policy, guidance and Future Wales: the national plan 2040? ✓

- 5.A.1. Yes, LDP 2 is considered to be in general conformity with the National Development Framework. Since 2020, Welsh Government have published Future Wales – The National Plan 2040 (Future Wales), and updated editions of Planning Policy Wales.
- 5.A.2. There are two provisions in Future Wales that directly relate to Pembrokeshire (Policy 29 Regional Growth Centres & Policy 32 Haven Waterway). Another element of Future Wales is that one of the pre-assessed areas for Wind Turbine Development extends into a part of eastern Pembrokeshire. These have been incorporated into the LDP through policies SP 6 (Settlement Hierarchy), SP 13 (Port and Energy Related Development and Celtic Freeport), GN 6 (Development Proposals in Pre-Assessed Areas for Wind Energy). Future Wales places an emphasis on the importance of a strategic approach to cross-boundary relationships between LPAs. The LDP sets out the 'Regional Context' covering the partnerships for working on the Swansea Bay City deal and Celtic Freeport, liaising on SDP preparation and also how the Council has sought to engage neighbouring authorities in the Plan preparation through stakeholder engagement. Liaison with neighbouring LPAs has been vital when creating various evidence base documentation, including, but not limited to, the Two County Economic Study, Housing Market Assessments and Retail Assessments. Future Wales emphasizes the multiple benefits that ecosystems offer to society and how important it is to protect and improve ecosystems. The LDP incorporates this principle of Future Wales primarily through Policies GN 1 (General Development Policy) and GN 44 (Protection and Enhancement of Biodiversity) Furthermore, the LDP has regard and conforms with the content of Future Wales, particularly with policies supporting the foundational economy, retail and employment growth.
- 5.A.3. The objectives of the LDP seek to deliver the 5 key principles (Growing our economy in a sustainable manner; Making best use of resources; Facilitating accessible and healthy environments; Creating & sustaining communities; maximising environmental protection and limiting environmental impact) identified in Planning Policy Wales (Section 2, Page 16)³¹, as highlighted in Table 1 of the Deposit Plan. A variety of the plans policies, including GN 33 (Farm Diversification) and GN 44 (Protection & Enhancement of Biodiversity), have been composed utilising the guidance set out in Planning Policy Wales (Edition 12).
- 5.A.4. The LDP, and its supporting documents, have been considered against the Derisking Checklist of Chapter 5 of the Development Plans Manual ³². The recommended processes and requirements that are advised through this checklist have been satisfied. Commentary on how this has been achieved can be found in Appendix A.

³¹ <https://www.gov.wales/planning-policy-wales Section 2, Page 16> 'Key Planning Principles'.

³² <https://www.gov.wales/development-plans-manual-edition-3-march-2020>

- 5.A.5. As part of their representation on the Deposit Plan, Welsh Government (1507/2) confirmed that, in their opinion, “Pembrokeshire County Council Replacement Local Development Plan (2022-2037) Second Deposit Plan is in general conformity with the National Development Framework: Future Wales, as set out in paragraphs 2.16 – 2.18 of the Development Plans Manual (Edition 3).
- 5.A.6. However, within their representation Welsh Government did highlight that the Deposit Plan should be updated to better reflect the guidance surrounding the protection of peatland within Planning Policy Wales Edition 12. As such 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) have been subject to focussed changes (FC5.GN06.01 and FC5.GN42.01) to consider the step wise approach (paragraph 6.4.15, 1a and 1b of PPW Ed.12) and PPW guidance of peatlands (paragraph 6.4.34).

A review of national policy and guidance in light of the submission of the LDP has highlighted where a change to the plan could be made to achieve better conformity. Please see Q 4 Significant Changes since publication of the Deposit Local Development Plan.

b) The Well-being Goals? ✓

- 5.B.1. LDP 2 has had regard to the provisions of the Well-being of Future Generations Act 2015 and to the Well-being Goals.
- 5.B.2. LDP2’s key issues and drivers are influenced by the Pembrokeshire Wellbeing Plan prepared in 2018. It is acknowledged that the referencing from the Wellbeing Plan has been updated in its latest version 2023. (paragraph 1.20 of the Local Development Plan 2)
- 5.B.3. The LDP 2 Vision reflects key elements of the Pembrokeshire Well-Being Plan (2018, and as revised in 2023). The compatibility of the Vision and Objectives has been considered against the Well Being of Future Generations goals and the Pembrokeshire Well-Being Plan priorities.³³
- 5.B.4. The LDP 2 objectives delivers the goals and five ways of working set out in the Well-being of Future Generations Act. (paragraph 2.5 and Table 1 of LDP 2).
- 5.F.1. The Local Well-being Goals are also used to frame strategic policies. Each strategic policy of LDP 2 sets out which of the Well-being Goals it meets.
- 5.F.2. The theme of well-being and the provisions of the Well-being of Future Generations Act 2015 is also considered through the Sustainability Appraisal process. The primary objective to test the performance of the Plan on this matter is Objective 2: *Promote and improve human health and well-being through a healthy lifestyle, access to healthcare and recreation opportunities and a clean and healthy environment*. Table 1.11 of the Sustainability Appraisal³⁴ provides a summary of in combination effects for this objective (see page 35): ‘2. Health & Recreation: Predominantly positive with some ‘no relationship’

³³ See Draft, Issues, Vision and Objective 2018 (Appendices) at <https://www.pembrokeshire.gov.uk/local-development-plan-review/strategic-options>

³⁴ <https://www.pembrokeshire.gov.uk/local-development-plan-review/sustainability-appraisal-strategic-environmental-assessment>

Creating sustainable places Policy SP 1 and focusing development at locations with services and access to open spaces will work well in assisting with this objective. The Place Making policies for sustainable design and ensuring adequate provision of open space for recreation under the GN 3 Infrastructure and New Development Policy will work well to achieve this objective. The employment policies will work synergistically alongside as these will assist mental health and general wellbeing. The protection afforded to the natural and historic environment also promotes (and ensure the permeance of) access to Pembrokeshire's natural and cultural heritage, creating active, healthy lifestyles, and mental health and wellbeing benefits. Alternative means of transportation through walking or cycling will add to this, in addition to the secondary effects of promoting electric vehicles which will likely reduce noise and air pollution. More widely, Pembrokeshire's planned nature recovery in conjunction with the implementation of the Green Infrastructure Assessment may improve the provision of leisure and recreation.'

c) The Welsh National Marine Plan? ✓

5.C.1. The Welsh National Marine Plan (WNMP) provides a vision within which those responsible for ports, harbours, marinas and inland waterways can plan their current and future operations, including options for expansion and diversification. Hence, it is also necessary for Local Planning Authorities to consider the land use implications of the Welsh National Marine Plan, both in a Development Plans and Development Management context. Paragraph 6.5.2 of the WNMP explains the role of this plan in identifying opportunities for the sustainable development of Wales' seas and in guiding development-related decisions both inshore and offshore. Development Plans and the WNMP are therefore expected to work together and support integrated decision making and collaboration in a marine and terrestrial context. Clearly, this is an important matter for Pembrokeshire County Council's LDP, given the importance of the Ports at Milford Haven and Fishguard and their role in delivering both national and more localised economic development objectives and also their importance in a conservation context, two aspects that at times may prove challenging to fully reconcile. The role of Milford Haven Port in future energy transformation from hydrocarbon to hydrogen-based technologies and in supporting future offshore floating wind energy proposals cannot be underestimated and will be supported by the Celtic Freeport designation. Both Milford Haven and Fishguard Ports also provide links to and from the Irish Republic and are thus significant enablers of trade between the UK and Ireland.

5.C.2. Given that context, it follows that there are two specific references to the Welsh National Marine Plan in LDP 2, Deposit Plan 2. The first of these is in paragraph 1.10, which forms part of the section of the Plan discussing National Context. That paragraph says:

a. The final Welsh National Marine Plan was published in November 2019. It will guide decisions on the sustainable use of our seas. It covers inshore and offshore marine plan areas (to the high-water mark) for which Welsh Ministers are the marine planning authority. Land (areas) between low and high-water marks are subject to the provisions of the Marine Plan and the terrestrial planning regime. Some wholly terrestrial development proposals will have impacts on the area covered by the Marine Plan and in these cases the Marine Plan will be a material consideration in their determination. Integration between marine and terrestrial planning areas will be necessary. Around Pembroke Dock, the area of terrestrial planning jurisdiction unusually extends to the mid-channel marker, so the overlap of the terrestrial and marine regimes is larger in this area than in most others.

5.C.3. There is a further reference to the Welsh National Marine Plan in LDP 2, Deposit Plan 2, which forms an element of the reasoned justification to policy GN 37 (Working of Minerals). This says:

5.C.4. *5.200 The provisions of the Welsh National Marine Plan are also relevant, as there is a sand and gravel wharf in Pembroke Dock, at which is landed marine-won resources from the outer Bristol Channel.*

5.C.5. The availability of sand and gravel for construction projects in Pembrokeshire is partly reliant on the material dredged from the outer Bristol Channel and brought into Pembrokeshire by sea and hence the safeguarding of that wharf and acknowledgement of the importance of importation of such material needs to be referenced by LDP 2.

Conclusion

5.C.6. The importance of the Welsh National Marine Plan is explained in paragraph 1.10 of LDP 2, with further details provided on how terrestrial planning and marine consenting regimes interrelate. The unusual circumstances relating to the extent of terrestrial planning jurisdiction around Pembroke Dock is referenced. Paragraph 5.200 also references the Welsh National Marine Plan, as there is a sand and gravel wharf in Pembroke Dockyard, which takes marine-won materials dredged from the Bristol Channel.

d) The relevant Area Statement? ✓

5.D.1. Natural Resources Wales (NRW) have published an Area Statement for the South West Wales area³⁵, which increase the understanding of the considerations around the natural resources in an area, the pressures on them and the benefits they provide. They provide information required to better manage natural resources under four themes:

- Reducing health inequalities
- Ensuring sustainable land management
- Reversing the decline of, and enhancing, biodiversity
- Cross-cutting theme: Mitigating and adapting to a changing climate

5.D.2. Taking each in turn the table below identifies how LDP 2 responds.

Reducing health inequalities	References in the Local Development Plan
Open green spaces and urban green infrastructure. Recreation activities and use of green and blue active travel. Protecting the environment for our well-being.	Policy SP 1 Creating Sustainable Places Policy SP 12 Maintaining and Enhancing the Natural Environment Policy SP 20 Transport Infrastructure & Accessibility Policy GN 1 General Development Policy Policy GN 2 Sustainable Design & Placemaking Policy GN 3 Infrastructure & New Development Policy GN 28 Historic Environment Policy GN 41 to 53 covers protecting our environment.

³⁵ <https://naturalresources.wales/about-us/what-we-do/strategies-plans-and-policies/area-statements/south-west-wales-area-statement/introduction-to-south-west-area-statement/?lang=en>

Ensuring sustainable land management	Most of the action areas here lie outside the planning system. However, there are elements where planning can interact. Soil Quality: Policy GN 1 General Development Policy Diversification: Policy GN 33 Farm Diversification Water Quality: Policy GN 47 Water Quality and Protection of Water Resources
Reversing the decline of, and enhancing, biodiversity	Policy SP 12 Maintaining and Enhancing the Natural Environment and Policy GN 41 to 53 covers protecting our environment. Paragraph 4.65 of LDP 2 advises that: <i>‘The Southwest Wales Area Statement produced by Natural Resources Wales (2020) is a key document which provides information on the Pembrokeshire environment, its key challenges and opportunities to strengthen ecological networks and ecosystem services. Important sources of information will be the local priorities in the Nature Recovery Action Plan for Pembrokeshire (2018), the Pembrokeshire Land Use Planning Tool and Supplementary Planning Guidance on Biodiversity and separately on Landscape Character Areas. These documents will assist in assessments as to whether or not development would be materially harmful to the environment.’</i> Reference is also made in paragraph 4.70 to Pembrokeshire’s Green Infrastructure Assessment 2023 which can be progressed as supplementary planning guidance.
Cross-cutting theme: Mitigating and adapting to a changing climate	Climate Change mitigation and adaptation is considered specifically in the following policies: Policy GN 2 Sustainable Design and Placemaking: energy efficiency and climate responsive siting and design (paragraph 5.23 and 5.25/5/26) Page 15 of Local Development Plan 2 advises that LDP 2 will mitigate and respond to the challenge of Climate Change in a number of ways: A. <i>The overall approach to directing growth in accordance with the Settlement Hierarchy aims to direct growth to locations with services and other facilities, thereby reducing the need to travel and reducing carbon emissions.</i> B. <i>New sites for vulnerable uses are not proposed in areas at fluvial or tidal Flood Risk or which will be at significant Flood risk in the future because of climate change.</i>

	C. <i>All new dwellings will be required to achieve high design standards incorporating energy efficient design.</i> D. <i>The Local Development Plan includes a specific policy requirement for all new dwellings to include the provision for Ultra Low Emission Vehicles charging.</i> E. <i>The Local Development Plan identifies a number of specific allocations for solar arrays.</i> F. <i>The Local Development Plan designates and protects sites and species of importance from a biodiversity and nature conservation viewpoint.</i> G. <i>The Plan is sufficiently flexible to allow the transformation of existing industrial sites to lower carbon or zero carbon alternatives in the years ahead.</i>
5.D.3. LDP 2 has also been subject to a Sustainability Appraisal with the Sustainability Objectives informed by the Area Statement (see Table 2: Topic areas and SA objectives (from the Scoping Report 2018 updated), Page 72)³⁶ 5.D.4. Sustainability Objective 10. <i>‘Prepare for and reduce the impact of Pembrokeshire’s contribution to climate change.’</i> is used to test the performance of the Plan in relation to responding to climate change. 5.D.5. In terms of LDP 2’s performance cumulatively in relation to this objective there are <i>‘positive and some uncertain results where usually a range of development types are possible. The Plan has sought to avoid allocating within flood zone areas. The scale of the development proposed in the Plan (e.g., growth in housing and employment) and the secondary impact of those factors (i.e., increasing traffic, resource consumption) is likely to lead to an increase in greenhouse gas emissions. However, the Plan’s strategy seeks to focus development in the most sustainable locations. The negative impacts identified under sustainable transport are also reflected here for climate change in conjunction with the same policies.’</i>	
e) If an LDP, the relevant strategic development plan (when adopted)? BS√	
5.E.1. There is currently no Strategic Development Plan for the South West Wales region. 5.E.2. Corporate Joint Committees (CJCs) will undertake strategic land use planning, economic development planning and regional transport planning in the future. From a land use planning perspective, this will focus on the preparation of Strategic Development Plans. 5.E.3. Pembrokeshire County Council is collaborating with other Local Authorities and National Park Authorities on these various streams of regional planning, through the auspices of the South West Wales CJC.	

³⁶ <https://www.pembrokeshire.gov.uk/local-development-plan-review/sustainability-appraisal-strategic-environmental-assessment>

- 5.E.4. The early focus of the South West Wales CJC has been on the preparation of a Regional Transport Plan for the region.
- 5.E.5. Work on a Strategic Development Plan for South West Wales is at an early stage, but the CJC resolved to prepare a Delivery Agreement for a regional SDP in May 2025. A Strategic Planning Sub Committee of the CJC is considering the detail of this matter and will be moving forward with Delivery Agreement preparation in the coming months.
- 5.E.6. There is currently much uncertainty over resourcing of SDP preparation. Welsh Government guidance on SDP preparation is only at draft stage at the moment (June 2025).
- 5.E.7. There is a long history of joint working and collaboration between the South West Wales Local Planning Authorities. Specifically, that has involved Swansea, Neath-Port Talbot and Carmarthenshire Councils and the Pembrokeshire Coast and Brecon Beacons National Park Authorities. At times, that collaborative approach has extended further, for instance to include Authorities in the adjoining Mid Wales region, specifically Ceredigion and Powys. This particularly applies where regional planning approaches don't fit the regional model set out in Future Wales – the National Plan 2040, for instance in relation to minerals, waste and river water quality.
- 5.E.8. Examples of recent regional and sub-regional collaborations have included the Swansea Bay and Llanelli National Growth Area commission and the regional Strategic Flood Consequences Assessment for the SW Wales region. There was also collaboration between Pembrokeshire and Carmarthenshire County Councils on the preparation of a Two County Economic Study. There is also a regional housing viability group in SW Wales, which also includes independent expertise. In a river water quality context, the work of the three NMBs in west Wales (for the Teifi, Tywi and Cleddau catchments) is under common management and there is also an all-Wales SAC Rivers Planning sub-group.
- 5.E.9. The work of Planning Officer Society Wales (POSW) and the Welsh Local Government Association (WLGA) also has all-Wales and regional aspects and brings together expertise from many different LPAs. The work of POSW touches on all key elements of Welsh planning and there are groups established to deal with particular topic areas, for instance minerals and waste.
- 5.E.10. In a minerals context, the South Wales Regional Aggregates Working Party (SWRAWP) is a joint Local Authority / NRW / Welsh Government / industry group which co-ordinates minerals planning in South Wales. Periodic review of the Regional Technical Statement for Aggregates is coordinated by Welsh Government, working with SWRAWP and its North Wales equivalent.
- 5.E.11. Conclusion
- 5.E.12. Currently there is no SDP for the South West Wales region. Work on the regional SDP is at an early stage. There is a long history of joint working and collaboration between the South West Wales Local Planning Authorities.

f) Regional plans/strategies and the programmes of utility providers? ✓

- 5.F.1. Pembrokeshire County Council's **transport strategy** up to 2020 was set out in the 2015 – 2020 Joint Local Transport Plan for South Wales.
- 5.F.2. The Southwest Wales Corporate Joint Committee is now preparing a Regional Transport Plan to support the aims of Llwybr Newydd: The Wales Transport Strategy 2021. As part of the process a public consultation on the future of the transport network in South West Wales was undertaken in March/April 2025. A final version of the Plan is anticipated to be published in **summer 2025**. The improvements identified in LDP 2 and on the Proposals Map include improvements identified in the Joint Local Transport Plan for South West Wales (2015-2020)³⁷ and those in the programmes of the Welsh Government, for instance on Trunk Roads and the County Council, for County Roads and also the development of a network of shared use routes, providing sustainable travel opportunities for pedestrians, cyclists and sometimes also other user groups such as equestrians.
- 5.F.3. **Final Water Resources Management Plan (WRMP) 2024**³⁸: Paragraph 6.5.7. advises *Pembrokeshire: In our WRMP19 we reported that with the proposed solution at our Canaston Bridge pumping station in place to support storage in Llys-y-Fran, the zone would be resilient to a 1 in 200 year drought event. This position was reported against the Dry Year Annual Average though we also noted that our critical period capability was constrained by our maximum supply capacity across the Cleddau Bridge into South Pembrokeshire. Since WRMP19, work has commenced to upgrade Canaston Bridge to enable a constant rate of abstraction using variable speed drives and updated automation and control systems. The installation of these elements was complete in April 2024, with final commissioning ongoing as of May 2024. The temporary pumping arrangement put in place during the summer of 2022 has been retained onsite for the commissioning phase to provide resilience until all work on-site is completed. We have also delivered work to resolve the supply restriction into South Pembrokeshire by installing a new booster pumping station adjacent to the Cleddau Bridge. This has enabled South Pembrokeshire to be supplied from Bolton Hill without resorting to tankering and enabled the removal of an over-land main across the Cleddau Bridge which was installed in 2018 to help meet peak demands. As shown in Figure 72³⁹ these improvements to our supply capability, together with our planned reductions in demand, will deliver the required level of drought resilience for the zone until late in the planning period. The planned demand management activity will significantly increase the drought resilience across the zone and could help to support industrial growth into the future.'*
- 5.F.4. This latest **Dwr Cymru Drainage and Wastewater Management Plan** ⁴⁰ was published in November 2023. The Plan provides an Area Summary for the Cleddau

³⁷ [https://www.bing.com/ck/a?!&p=1fe5ef47626925d6efff824496046ae5f21fb7908a5de998f39f8b2b88054505JmltdHM9MTc1NTY0ODAwMA&ptn=3&ver=2&hsh=4&fclid=3bbce913-3b04-689f-2917-fcf73ae4694e&psq=Joint+Local+Transport+Plan+for+South+West+Wales+\(2015-2020\)&u=a1aHR0cHM6Ly9zd2Fuc2VhLmdvdi51ay9tZWRpYS8yNTU2L0pvaW50LVRYYW5zcG9ydC1QbGFuLWZvc1Tb3V0aC1XZXN0LVdhdGVzLTlwMTU0MjAyMC9wZGYvSm9pbmRvHjbnNwb3J0X1BsYW5fZm9yX1NvdXR0X1dlc3Rv2FsZXNfMjAxNS0yMDIwLnBkZj9tPTE2Mjk3MzE2NTY0NzM&ntb=1](https://www.bing.com/ck/a?!&p=1fe5ef47626925d6efff824496046ae5f21fb7908a5de998f39f8b2b88054505JmltdHM9MTc1NTY0ODAwMA&ptn=3&ver=2&hsh=4&fclid=3bbce913-3b04-689f-2917-fcf73ae4694e&psq=Joint+Local+Transport+Plan+for+South+West+Wales+(2015-2020)&u=a1aHR0cHM6Ly9zd2Fuc2VhLmdvdi51ay9tZWRpYS8yNTU2L0pvaW50LVRYYW5zcG9ydC1QbGFuLWZvc1Tb3V0aC1XZXN0LVdhdGVzLTlwMTU0MjAyMC9wZGYvSm9pbmRvHjbnNwb3J0X1BsYW5fZm9yX1NvdXR0X1dlc3Rv2FsZXNfMjAxNS0yMDIwLnBkZj9tPTE2Mjk3MzE2NTY0NzM&ntb=1) Regional Transport Plan link.

³⁸ <https://www.dwrcymru.com/en/our-services/water/water-resources/final-water-resources-management-plan-2024>

³⁹ Figure 72 - Pembrokeshire Final Plan S/D Balance shows supply exceeding demand forecasting to 2050.

⁴⁰ <https://www.dwrcymru.com/en/our-services/wastewater/drainage-and-wastewater-management-plan/our-current-plan-dwmp24>

and Pembrokeshire Coastal Rivers. The Plan advises that in terms of demand and supply for the catchment areas identified that *future predictions of growth in the area have been estimated based on the average between the rate of properties that have been built in the past 10 years and the rate that the local development plan predicts houses should be built. In addition to this, we have accounted for the changes in the existing population by the change in the number of people living in an average property in the area. Supply-demand is an assessment of the capacity of our treatment works. It approximately assesses whether all the treatment works in a region can collectively cope with current and future flows in dry and wet weather. There are two parts to the assessment: dry weather flow (DWF) and a wet weather capacity assessment.* All catchments are identified as showing that the balance between supply and demand currently passes the assessment criteria available, for headroom only and will continue to pass to 2050. **Welsh Water/Dwr Cymru's investment plan** has been taken into account when developing the housing trajectory, as some wastewater treatment works require upgrade works to accommodate additional foul water. Welsh Water has provided detailed representations on LDP 2 Deposit Plan 2 in terms of water supply and dealing with foul water.

- 5.F.1. As the AMP is a capital delivery programme for 2025-2030, the information is aggregated into different documents, with different departments responsible for delivering for their business areas. As such there isn't a definitive 'AMP' document⁴¹. The Business Plan 2025-30 does not have specific additional locations detailed; the investment is broadly aimed at improving river water quality and addressing pollution risks across Wales.
- 5.F.2. Following the publication of LDP 2 Deposit Plan 2 NRW has published Conservation Advice Packages (Regulation 37) and the Condition Assessment for the marine Special Areas of Conservation (SAC) and Special Protection Areas (SPAs) located entirely in Wales. (published on the 25 June 2025)⁴²
- 5.F.3. Please also see Q 3 above regarding LDP2's Habitats Regulations Assessment.
- 5.F.4. In terms of **national grid** ⁴³ the latest plans 'Network Development Plans' were published on 1st May 2024 and can be viewed in the link below. There is a specific annex dealing with the South Wales area outlining the constraints overview for the various substations etc., solutions options, a discussion and solution recommendations. The website includes scenario planning for future development. National Grid were also consultees during Plan preparation where the need to take account of the location of utilities as a constraint is needed when site planning.
- 5.F.5. More specifically on **candidate sites** the Council has published a LDP 2 Candidate Site Assessment Methodology, which is available to view on its website.⁴⁴

⁴¹ <https://corporate.dwrcymru.com/en/library/pr24-reports>

⁴² Natural Resources Wales / Further action needed to protect Wales's marine protected areas <https://naturalresources.wales/about-us/news-and-blogs/news/further-action-needed-to-protect-wales-s-marine-protected-areas/?lang=en>

⁴³ <https://dso.nationalgrid.co.uk/planning-our-future-network/network-development-plan>

⁴⁴ <https://www.pembrokeshire.gov.uk/local-development-plan-review/candidate-sites>

5.F.6. Candidate Site assessment was a phased process and has involved: ▪ Initial registration; ▪ A phase 1 assessment looking at each site in the context of GIS constraints; ▪ A phase 2 assessment looking at compatibility with the LDP 2 Preferred Strategy; ▪ A phase 3 assessment involving consultation with various internal departments at PCC and with key external organisations; ▪ A phase 4 assessment looking at landscape and biodiversity; ▪ A phase 5 assessment looking at deliverability. 5.F.7. As part of the assessment Dwr Cymru Welsh Water was consulted upon for all CSs except for those relating to transport schemes. Hywel Dda – all CSs for residential development and health care scheme proposals. Ministry of Defence – all CSs within MoD safeguarding areas. National Air Traffic Service – CSs selected on basis of good practice guide. PCC Education – all residential CSs, plus any CSs for proposed uses that would potentially benefit schools. PCC Older Persons and Specialist Accommodation service – all CSs proposing supported / specialist residential accommodation, including retirement homes. PCC Public Rights of Way – all CSs within 10m of a PROW, plus all transport route proposals. Also to note: No response received from the H&SE, so the available H&SE map layers were interrogated by PCC officers for CS assessment purposes. Western Power Distribution – PCC downloaded data provided and analysed it in-house for CS assessment purposes. Welsh Government Trunk Road Agency – asked for additional information in conjunction with the data request, which was provided where available.	
g) The plans/strategies of neighbouring local planning authorities? 	
5.G.1. Paragraph 1.19 of LDP 2, Deposit Plan 2 discusses this matter and is reproduced below: <i>1.19 Ceredigion County Council and Carmarthenshire County Council are currently reviewing their Local Development Plans. Ceredigion has paused its LDP review, while Carmarthenshire reached Deposit stage at a similar time to PCC and repeated that stage of the Plan process based on a revised Plan in spring 2023. An Examination of the Carmarthenshire Plan is due to commence in autumn 2024. The Pembrokeshire Coast National Park Authority adopted its replacement LDP (LDP 2) in September 2020. PCC is committed to working collaboratively with its neighbouring authorities and a number of joint pieces of evidence base have been produced. All neighbouring Authorities attend Pembrokeshire's key stakeholder panel and are involved in advising on the emerging LDP. Statements of Common Ground have been produced with neighbouring Authorities and are published as part of the Plan's evidence base. As a reflection of the need to commence preparation of the regional Strategic Development Plan, there is also ongoing collaboration with other Local Planning Authorities in SW Wales, specifically Neath-Port Talbot and Swansea Councils and the Brecon Beacons National Park.</i> 5.G.2. Some updates to the information above can now be provided, specifically that: a. Ceredigion County Council's LDP 2 remains paused. b. Carmarthenshire County Council's LDP 2 Examination hearing sessions took place in October and November 2024. In January 2025, the Inspectors asked for further housing sites to be identified – this has been done and there has been further public consultation on those additional sites.	

- c. The Pembrokeshire Coast National Park Authority has recently commenced a further review of its LDP – which will form their LDP 3. Consultation on a Review Report and draft Delivery Agreement has taken place.
- d. The collaborative work with neighbouring authorities in conjunction with PCC LDP 2 preparation includes the following:
- e. The Two County Economic Study for Carmarthenshire and Pembrokeshire, prepared by Arup, 2019 – PCC and Carmarthenshire CC
- f. The Two County Economic Study for Carmarthenshire and Pembrokeshire – 2020-21 update, prepared by Arup, 2021 – PCC and Carmarthenshire CC
- g. PCC and Pembrokeshire Coast National Park Authority Statement of Common Ground, 2018 – PCC and PCNPA
- h. Gypsy Traveller Accommodation Assessment, 2019 – signed off by Welsh Government in 2024 – PCC, PCNPA and Welsh Government
- i. Pembrokeshire LHMA 2021 – PCC, PCNPA and Welsh Government
- j. Pembrokeshire LHMA 2023 – signed off by Welsh Government in 2025 – PCC, PCNPA and Welsh Government
- k. Minerals Statement of Common Ground 2018 – PCC, PCNPA, Ceredigion CC and Carmarthenshire CC
- l. Statement of Sub-Regional Collaboration on Minerals for the West Wales Sub-Region – not yet completed – PCC, PCNPA, Ceredigion CC and Carmarthenshire CC
- m. SW Wales Regional Retail Study, 2017 – prepared by Carter Jonas on behalf of PCC, PCNPA and Ceredigion CC
- n. Carmarthenshire and Pembrokeshire Stage 1 Strategic Flood Consequences Assessment (SFCA), 2019 – prepared by Atkins for PCC and Carmarthenshire CC
- o. South West Wales Stage 1 Strategic Flood Consequences Assessment Final Report, 2022- prepared by JBA for Swansea Council, Carmarthenshire CC, Neath-Port Talbot Council, PCC, PCNPA and Brecon Beacons NPA
- p. Waste Planning Monitoring Report for Mid and SW Wales, 2023/24 – prepared by Carmarthenshire CC on behalf of Welsh Government, with inputs from all LPAs in the two regions – unpublished by Welsh Government but made available to the LPAs within those two regions for planning purposes

5.G.3. In addition to the above, there are three further LDP 2 evidence base papers that have been prepared by PCC and which relate to cross-boundary matters:

- a. Cross Boundary Settlements – consistency of approach with neighbouring authorities, 2021 – PCC
- b. Renewable Energy – buffer for the National Park and Solar Arrays, 2019 – PCC
- c. Brawdy Airfield – Landscape and Visual Appraisal of potential wind energy development, 2021 – PCC
- d. Also to note, there are several items of Supplementary Planning Guidance which support the current LDP (adopted in 2013) which have been prepared jointly with the Pembrokeshire Coast National Park Authority in the post-adoption period:
- e. Cumulative Impact of Wind Turbines on Landscape and Visual Amenity SPG, 2022 – PCC and PCNPA
- f. Biodiversity SPG, 2021 – PCC and PCNPA
- g. Planning Obligations SPG, 2016 – PCC and PCNPA
- h. Seascape Character SPG, 2023 – PCC and PCNPA
- i. Also worthy of mention is the following Good Practice Guidance:
- j. Slurry Stores, 2013 – ADAS, CCW, FuW, NFA, PCC and PCNPA

5.G.4. There is a further regional commission which should be referenced here, even though it does not directly apply to Pembrokeshire:

- a. Swansea Bay and Llanelli National Growth Area Definition Project – Research Report – Turley, on behalf of Welsh Government, Carmarthenshire CC, Swansea Council, Neath-Port Talbot Council and PCC
- b. Matters relating to river water quality and the work of the joint Nutrient Management Boards for West Wales will be covered in a separate paper. However, in the context of this paper it is worth noting:
- c. Statement of Common Ground – Supporting Sustainable Development within Carmarthenshire by Safeguarding Phosphorous Sensitive Riverine Special Areas of Conservation – prepared by Carmarthenshire CC in October 2023 and signed by PCC on 27/03/24 (to note – Carmarthenshire also asked for support from other SW Wales and Mid Wales authorities, NRW and DCWW on this)
- d. Work on a SW Wales regional Statement of Common Ground was started in 2024, but has not been completed – to note that the work of the SW Wales CJC towards the regional Strategic Development Plan may have superseded this initiative.

Conclusions:

- 5.G.5. PCC has sought to ensure that the emerging LDP 2 is in general conformity and has compatibility with the Plans of neighbouring Local Planning Authorities – and where necessary also with the Plans of other Local Planning Authorities in the SW Wales and Mid Wales regions. Where possible, joint work has been undertaken, evidence for which can be found in the LDP 2 evidence base.
- 5.G.6. Work on LDP reviews amongst neighbouring Local Planning Authorities shows a highly variable pattern with differing timescales – and in one case (Ceredigion CC) work on LDP review has been paused indefinitely.
- 5.G.7. There are some completed and emerging Statements of Common Ground / Statement of Sub Regional Collaboration that help to underpin a consistent approach to planning work in SW and Mid Wales.
- 5.G.8. Work on regional plans, under the auspices of the CJC, is getting underway, so collaborative working at a strategic level is already established and will get stronger in the coming years. Although work on the SW Wales Strategic Development Plan is at a very early stage, the work on the Regional Transport Plan for SW Wales is more advanced.
- 5.G.9. Dialogue with all neighbouring Local Planning Authorities and with other authorities in SW Wales region and Mid Wales region continues and wherever feasible joint approaches and collaborative work will be undertaken. It is also worth mentioning that the establishment of the three Nutrient Management Boards in West Wales (for the Teifi, Tywi and Cleddau riverine catchments) is further strengthening inter-authority planning approaches, although this is a matter that is dealt with in a separate paper. Suffice to say that Nutrient Management Plans for each river catchment are nearing completion at the time of writing (June 2025).

h) The relevant Well-being Plan or National Park Management Plan? ✓

- 5.H.1.** The Draft Vision has been developed following discussions with County Councillors and Key Stakeholders and through the ongoing SA/SEA process⁴⁵. The Vision reflects key

⁴⁵ Reports of Public Engagement and Public Consultation on the Strategic Options are available at: <https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base>

elements of the Pembrokeshire Well-Being Plan (2018, and as revised in 2023) influences from the Wales Spatial Plan (2008 Update) and Future Wales – The National Plan, 2040. The compatibility of the Vision and Objectives have been considered against the Well Being of Future Generations goals and the Pembrokeshire Well-Being Plan priorities.⁴⁶ Please also see the answer to Q 1.B.Delivery Agreement, Wellbeing & Future Generations Act, Equality Act✓

⁴⁶ See Draft, Issues, Vision and Objective 2018 (Appendices) at <https://www.pembrokeshire.gov.uk/local-development-plan-review/strategic-options>

6. Joint Working Opportunities ✓

Has the LPA exhausted all opportunities for joint working and collaboration on both the preparation of the DP and its evidence base? ✓

- 6.1. In response to the earlier question on preparation of the Development Plan in accordance with the requirements of the plans / strategies of neighbouring local planning authorities, PCC has prepared information on:
- a) the stages of LDP reviews reached by neighbour authorities, which are not aligned with PCC's timetable and in one case is indefinitely paused;
 - b) collaboration and alignment elsewhere in the SW Wales region – and sometime beyond this; and
 - c) wider regional collaborations.
- 6.1. Broadly speaking, PCC has done what it can to work collaboratively with neighbouring local planning authorities and indeed with other local planning authorities in the SW Wales and Mid Wales regions where appropriate, to share information and approaches and seek conformity and implement best practice wherever possible.
- 6.2. Another important element of this is the work that is being undertaken in relation to river water quality issues in West Wales, where much collaborative effort has been made with regard to issues affecting protected river catchments (those with SAC designation) and including the preparation of Nutrient Management Plans for affected West Wales catchments, including the Teifi and the Cleddau, which are nearing completion at the time of writing (June 2025). The work of the three West Wales NMBs is coordinated by a single manager, which facilitates inter-authority working on these matters, but there is variation in the staff and resources that each partner authority can provide.
- 6.3. The many aspects of collaborative working are set out in the response to the question relating to neighbouring planning authorities. Some of this work is ongoing, for instance on the Statement of Sub-Regional Collaboration for Minerals, which is being prepared for the West Wales sub-region. Attempts have also been made to prepare a Statement of Common Ground for the SW Wales LPAs, but this is now being overtaken by the preliminary work on the SW Wales Strategic Development Plan.

Conclusions:

- 6.4. For the time being, as much joint working and collaboration has been undertaken for LDP 2 as is feasible within existing budgets and with existing staffing levels, but the door is never shut on this and new opportunities may emerge in the coming months. For PCC, the priority now is to take LDP 2 through the Examination stage and to adoption, after which further attention can be devoted to joint working, for instance on Supplementary Planning Guidance, which will also help other LPAs undertaking LDP reviews. PCC will also be able to contribute to workstreams relating to the preparation of the Strategic Development Plan for South West Wales, through the auspices of the CJC.

- 6.5. Although not mentioned in the paper on collaborative work with neighbouring LPAs, reference should also be made to the regional work being undertaken on the Regional Transport Plan (also through the CJC and well advanced) and the implementation of the Pembrokeshire Local Area Energy Plan (LAEP), which sets a high bar for further delivery of renewable energy projects.
- 6.6. A final matter to reference is the emergence of the Celtic Freeport, which is focusing attention on delivery of a range of economic development and energy projects in both Pembrokeshire and Neath-Port Talbot, in the former case focussed in particular on the Haven Waterway and the Celtic / Irish Sea. Hydrogen transformation of the major industrial sites along the Haven Waterway is one aspect of this, floating offshore wind turbines another. Sites elsewhere in Pembrokeshire may also come into consideration in a Freeport context and collaboration with colleagues in Neath-Port Talbot Council is an element of the roll-out of large-scale strategic industrial / employment projects.

7. Spatial Strategy ✓

What is the DP's spatial strategy? How do the key components of the strategy interact? Does it represent an appropriate approach for delivering, managing and distributing growth over the Plan period?

- 7.1. The Spatial Strategy of the Local Development Plan is intended to distribute growth throughout the Plan within the context of promoting sustainable development. At the core of this is directing 60% of residential growth to the largest (urban) settlements, with the remaining 40% being distributed throughout the rural area, in line with the current population split of the County. A Settlement Hierarchy is used to identify the level of growth for each settlement, defined by the level of facilities and services available, and thereby reducing the need to travel. (See Strategic Policies SP 6 – *Settlement Hierarchy*; SP 7 – *Settlement Boundaries* and the Strategy Key Diagram).
- 7.2. The employment strategy for the Plan is based on the findings of an Economic Study undertaken for Pembrokeshire and Carmarthenshire in 2019, with a post-covid update in 2020/21. This study informed the identification of larger (Strategic) employment sites based around the specific locational assets and sectoral strengths in Pembrokeshire and specific opportunities linked to existing businesses growth aspirations. The Plan Strategy also includes allocations to support smaller-scale, local employment growth. (See Strategy Policies SP 13 – Port and Energy Related Development and Celtic Freeport; SP 14 – Strategic Employment Provision; SP15 Safeguarding of Existing Strategic Employment Sites and General Policies GN 8 – Employment Proposals; GN 9 – Employment Allocations; GN 11 – Protection of Employment Sites and Buildings; and GN 12 – Extensions to Employment Sites.)
- 7.3. A significant element of the Pembrokeshire economy is tourism, with the majority of visitors arriving by car. The strategy for tourist accommodation is linked to that for residential development and directed to larger settlements where it can be supported by available services and facilities. A landscape capacity study undertaken in 2019 is provides the basis for directing such proposals to larger settlements but recognising that smaller, temporary sites are appropriate for countryside locations, providing that they are acceptable in landscape capacity terms. (See General Policies GN 55 – Serviced and Hotel Accommodation; GN 56 – Caravan, CN 58 – Self-Catering Accommodation.)
- 7.4. A Retail Hierarchy for the Plan area aligns with the national Town Centre First policy approach and promotes the identified Town and Local Centres as hubs of socio-economic activity and focal points for a diverse range of services to support the local communities they serve. Proposals are required to be consistent with the scale and nature of each Centre and support town centre regeneration. The hierarchy identifies Haverfordwest as a sub-regional centre, with five town centres and six local retail centres distributed throughout the Plan area. (See Strategic Policy SP 16 – Retail Hierarchy).
- 7.5. The sustainability of the Spatial Strategy of the Plan is guided by protection of the natural environment (see Policy SP 12 Maintaining and Enhancing the Natural Environment) and protecting and supporting the Welsh language within identified language-sensitive areas (See Policy SP 19 – Welsh Language).

7.6. Overall, the Spatial Strategy of the Plan provides for the sustainable growth of Pembrokeshire's communities by directing a majority of new development to the County's urban locations or existing employment locations, with the remainder distributed throughout the rural areas of the County, mainly in the larger and medium size villages.

The main benefits of this strategy are:

- Maximises the use of brownfield land;
- Minimises the use of highest grades of agricultural land;
- Encourages regeneration of town centres and re-use of employment sites;
- Reduces the overall need to travel and encourages use of public transport and active travel modes;
- Protects the natural environment;
- Supports the Welsh language;
- Supports cohesive communities;
- Supports employment opportunities;
- Helps to tackle the causes of climate change;
- Mitigates against the consequences of climate change.

8. Settlement Hierarchy ✓

How was the DP's settlement hierarchy defined? Is the methodology used to define the hierarchy clear and rational?

- 8.1. The Settlement Hierarchy for LDP2 is based on an assessment of the towns and villages within the Plan area and the number of services and facilities available. The methodology is set out in 2 parts – these being the Urban Settlements Report (Sept 2019 with minor updates July 2024)⁴⁷ and the Rural Facilities Report (Dec 2020 with minor updates July 2024)⁴⁸. Both reports use an assessment of facilities and services to establish the hierarchy.
- 8.2. The towns identified in the Urban Settlements Report are those identified in Future Wales (2021) as the Haven Towns of Haverfordwest, Milford Haven, Pembroke and Pembroke Dock. In addition, the towns of Fishguard, Goodwick, Neyland and Narberth were included. These towns are distinguishable from the remaining settlements in the Plan area in terms of their population and the availability of a wider range of services and facilities. (See Urban Settlements Report September 2019 with corrections July 2024).
- 8.3. A survey of each town was undertaken to consider a range of facilities, including A Class units in town centres (occupied and vacant), primary and secondary schools, meeting places, public transport accessibility, active travel routes, hospitals and health facilities, employment land (occupied and vacant); open spaces and permanent library and the hierarchy established by the availability of the identified services and facilities.
- 8.4. The methodology clearly ranked Haverfordwest as the main hub of activity, followed closely by Milford Haven. It also shows that there is a complementarity between the adjacent towns of Fishguard and Goodwick which share many facilities, and for close neighbours – Pembroke and Pembroke Dock. (See Strategic Policy SP 6 – Settlement Hierarchy). (See Urban Settlements Report July 2019 with corrections July 2024).
- 8.5. The Rural Facilities Report sets out the methodology used to continue the hierarchy of smaller settlements in the Plan area. In a similar way to the Urban Settlements approach, a survey of available services and facilities was undertaken. Some facilities were categorised as 'prime services' due the important contribution they make to the social and economic life of communities. Others were regarded as 'additional services' and a weighted scoring system was used to rank settlements, alongside other considerations including population, their inter-relationship with adjoining or related settlements and accessibility by public transport and active travel routes. The highest weighting was given to facilities that provide every-day needs for communities – namely a convenience shop and primary school. The next category of weighted facilities was a meeting place and frequent public transport service. Permanent post offices, play groups, GP surgeries and pharmacies were given the

⁴⁷ <https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base> under heading 'Spatial Strategy'

⁴⁸ <https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base> under heading 'Spatial Strategy'

next level of weighting and one point scored for other facilities including places of worship, mobile services, irregular public transport, public sewerage system and capacity at a waste water treatment works. (See Rural Facilities Report December 2020 with corrections July 2024).

- 8.6. Those settlements scoring the highest weighted score were classed as Service Centres, having a score of 30+. Next, with a score of 11+ points and a population of at least 100, were Service Villages. A large number of settlements are classed as Local Villages, scoring between 3 and 10 points and having a population of at least 100. (See paragraphs 3.10 and 3.11 of the Rural Facilities Report December 2019 with corrections July 2024). The table under paragraph 4.31 of the Deposit LDP2 shows where new development is directed within the Settlement Hierarchy.
- 8.7. Some of the smaller settlements have been categorised as ‘Cluster Villages’ (See Strategic Policy SP 10 – Local Villages). These are villages that individually would not meet the required threshold to be regarded as a Local Village, but have a strong functional link, via a public transport or active travel route to a higher order settlement with a maximum of 25 minutes travel time. It must also have a minimum weighted score of 5 to be clustered with other settlements. Whilst Cluster Villages do not contain residential allocations, there may be opportunities for windfall development of up to 5 houses available. (See Defining Settlement Clusters Report May 2019 and updated December 2020)⁴⁹.

⁴⁹ <https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base> under heading ‘Spatial Strategy’

9. Distribution of development – Placemaking

What is the rationale for the distribution of new development? Is the approach consistent with the National Sustainable Placemaking Outcomes?

Creating and Sustaining Communities	
Placemaking Outcome	Plan Response
Enables the Welsh language to thrive	▪ Identification of a Welsh language-sensitive area where the number of Welsh speakers is at least 18% of the community; ▪ Policy SP 19 (Welsh Language) encourages all proposals to retain and enhance the Welsh language across the whole Plan area; ▪ Phasing of development on larger allocations within the Welsh language-sensitive area; ▪ Requirement for Welsh Language Impact Assessment for larger windfall proposals within the Welsh language-sensitive area.
Appropriate development densities	▪ Policy GN 13 (Residential Development) – sets out development densities appropriate to the Settlement Hierarchy; ▪ Policy GN 16 (Residential Allocations) – provides an indicative number of units to be delivered during and beyond the Plan period, based on the appropriate development density requirement.
Homes and jobs to meet society's needs	▪ Growth strategy based on an average of: ○ Welsh Government Long-Term Population Projection; ○ Five-year average dwelling completion rate (2014 – 2019); ○ Ten-year average dwelling completion rate (2009 – 2019). ▪ Affordable housing provision based on anticipated levels of delivery; ▪ Provision of Gypsy, Traveller and Show People need based on the GTAA 2019; ▪ Allocation of a range of employment land and safeguarding of existing employment land to support delivery of an estimated 1,970 jobs; ▪ Celtic Freeport will provide additional growth.
A mix of uses	▪ Land allocated for housing, Gypsy and Traveller pitches, specialist and supported accommodation, strategic and local employment sites, schools; ▪ Policies to allow consideration of a wide-range of uses throughout the Plan area.
Offers cultural experiences	▪ Policy GN 54 (Visitor Attractions and Leisure Facilities) allows consideration of proposals that may include cultural attractions.
Community-based facilities and services	▪ Policy GN 30 (Community Facility Allocations) allocates land for known community facility shortfalls;

	Policy GN 29 protects against unnecessary loss of existing facilities and services and provides a context to provide new proposals.
Making the Best Use of Resources	
Outcome	Plan Response
Makes best use of natural resources	- Policy SP 11 (Countryside) controls the type of development permitted outside of Settlement Boundaries; - Policy SP 12 (Maintaining and Enhancing the Natural Environment) protects all aspects of the natural environment and promotes biodiversity net gain; - Policy SP 18 (Non-Energy Minerals) safeguards mineral resources and supports the re-use and recycling of materials; - Policy GN 1 (General Development Policy) protects water quality; - Policy GN 2 (Sustainable Design and Placemaking) encourages resource-efficient and climate-responsive design and requires use of sustainable drainage systems; - Policy GN 4 (Resource Efficiency and Renewable and Low-Carbon Energy) promotes the use of renewable energy; - Policy GN 5 (Renewable Energy – Target and Allocations) sets a target provision of renewable energy capacity and allocates sites for renewable energy technology; - Policy GN 6 (Development Proposals in Pre-Assessed Areas for Wind Energy (as set out in Future Wales) protects areas defined for wind energy use from other forms of development; - Policy GN 37 (Working of Minerals) protects against unnecessary working of minerals and allows appropriate working to support local needs; - Policy GN 38 (Safeguarding and Prior Extraction of the Mineral Resource) allows for or the protection and/appropriate extraction of minerals prior to potential sterilisation by other forms of development; - Policy GN 39 (Secondary Aggregates and Recycled Waste Minerals) encourages appropriate use of these assets; - Policy GN 47 (Water Quality and Protection of Water Resources) protects water quality, encourages efficient use of water, safeguards watercourses and seeks to manage waste-water discharges; - Policy GN 48 (Green Wedges) protects areas of undeveloped land which help to maintain identities of communities; - Policy GN 51 (Protection and Creation of Outdoor Recreation Areas) protects areas, including natural areas for recreational use;

	▪ Policy GN 52 (Protection of Open Space with Amenity Value) protects areas that contribute towards appearance, character and amenity, including natural areas from inappropriate developments; ▪ Policy GN 56 (Caravan, Camping and Chalet Development) directs new and extensions to existing sites to areas where the landscape is able to absorb additional development.
Prevents waste	▪ Policy SP 21 (Waste Prevention and Management), Policy GN 59 (Waste Management Facilities) and Policy GN 60 (Disposal of Waste on Land) seek to minimise the generation of waste and ensure proper management of any waste generated and in the case of GN 59 identifies potential sites for the handling and treatment of waste. Reference is made in the supporting text to GN 59 of Welsh Government's 'Towards Zero Waste – One Wales, One Planet' and to the Welsh planning guidance on waste in PPW edition 12 and TAN 21. PCC is putting in place a local policy approach which is consistent with and complements the national documents on the topic. ▪ Policy GN 2 (Sustainable Design and Placemaking) require developments to incorporate resource-efficiency and conserve water and to provide adequate facilities and space for the collection and recycling of materials; ▪ Policy GN 4 (Resource Efficiency and Renewable and Low-Carbon Energy Proposals) requires developments to minimize resource-demand, improve resource-efficiency and be powered by renewable energy. They will be expected to be well designed in terms of energy use; ▪ Policy GN 34 (Conversion or Change of Use of Traditional Buildings) allows the re-use of appropriate buildings for a range of new uses; ▪ Policy GN 39 (Secondary aggregates and Recycled Waste Minerals) allows the use of secondary aggregates and recycled waste minerals, including the re-use of construction materials arising from demolition, in appropriate circumstances; ▪ Policy GN 47 (Water Quality and Protection of Water Resources) requires developments to incorporate sustainable drainage systems which reduces the amount of water flowing into the public sewers.
Prioritises the use of previously developed land and existing buildings	▪ The Plan Strategy delivers the majority of growth to urban areas, where there are likely to be more opportunities to re-use previously developed land and buildings; ▪ Policy SP 11 (Countryside) provides greater control over development outside settlement boundaries but allows for the re-use and conversion of appropriate existing buildings;

	▪ Policy SP 14 (Strategic Employment Sites) and Policy GN 9 (Employment Allocations) allocate land for employment development, the majority of which is previously developed land and/or buildings; ▪ Policy SP 15 (Safeguarding of Existing Strategic Employment Sites) and Policy GN 11 (Protection of Employment Sites and Buildings) provide a supply of land for re-use by employment purposes; ▪ Policy SP 16 (Retail Hierarchy) defines areas for retail and commercial activity and in combination with Policies GN 31 (Town Centre and Local Retail Centre Development) and GN 32 (Out-of-Centre Retail and Commercial Development) prioritise the re-use of land within town centres for this purpose (Town-Centre First); ▪ Policy GN 7 (Cawdor Barracks including the former Brawdy Airfield) provides a policy context for the potential re-use of this Ministry of Defence site; ▪ Policy GN 8 (Employment Proposals) prioritises the re-use of land and buildings over new sites in the countryside; ▪ Policy GN 14 (Replacement Dwellings in the Countryside) supports the replacement of dwellings on the same footprint in countryside locations; ▪ Policy GN 34 (Conversion or Change of Use of Traditional Buildings) allows for the re-use of appropriate buildings in the countryside and for limited expansion only of previously converted buildings.
Unlocks potential and regenerates	▪ The strategy of the Plan promotes sustainable growth for Pembrokeshire up to 2033. This includes allocating land for 5,840 new homes and for employment uses to create up to 2,970 new jobs, including those arising from the Celtic Freeport. ▪ Regeneration comes through the re-use of land and buildings, safeguarding existing employment sites for their re-use for new employment purposes, providing for the delivery of renewable energy proposals and focusing retail and commercial development in the largest towns to aid town centre regeneration.
High quality and built to last	Policies GN 1 (General Development Policy) and GN 2 (Sustainable Design and Placemaking) prescribe general principles for all development to deliver sustainable development.
Maximising Environmental Protection and Limiting Environmental Impact	
Outcome	Plan Response
Resilient biodiversity and ecosystems	▪ Policies GN 1 (General Development Policy) and GN 2 (Sustainable Design and Placemaking) set out fundamental requirements for all development which protects and where possible, enhances the natural environment.

	▪ Policies GN 41 (Protection of National Statutory Environmental Designations); GN 42 (Protection of Local Nature Reserves (LNR), Regionally Important Geodiversity Sites (RIGs) and Peat Deposits; GN 43 (Protection of Trees, Woodlands and Hedgerows); and GN 44 (Protection and Enhancement of Biodiversity) set out the requirements to protect specific elements of the natural environment and protect and enhance biodiversity.
Distinctive and special landscapes	▪ Policy SP 12 (Maintaining and Enhancing the Natural Environment) seeks to protect all aspects of the natural environment from the harmful effects of development. ▪ Criterion 3 of Policy GN 1 (General Development Policy) requires all development to be compatible with landscape character, quality and diversity including potential impacts on the Pembrokeshire Coast National Park and other neighbouring local planning authority areas. ▪ Policy GN 49 (Landscape) aims to ensure that unacceptable harmful impact on landscape is avoided and where appropriate, suitable mitigation is achieved.
Integrated green infrastructure	Policy GN 45 (Green Infrastructure) aims to retain and improve the network of natural and semi-natural spaces (Green Infrastructure) within the Plan area.
Appropriate soundscapes	▪ A draft Landscape Character Assessment has been prepared and forms part of the evidence base for LDP2. The assessment includes noisy and tranquil descriptors where appropriate. It is intended to take the Landscape Character Assessment forward as Supplementary Planning Guidance to LDP2. ▪ Policy GN 1 (General Development) sets out a wide range of requirements for all development, including the need to take noise and landscape character into account.
Reduces environmental risks	▪ Policy SP 12 (Maintaining and Enhancing the Natural Environment) seeks to protect all aspects of the natural environment from the harmful effects of development. ▪ Policies GN 1 (General Development Policy) and GN 2 (Sustainable Design and Placemaking) prescribe general principles for all development to deliver sustainable development, including consideration of flood risk and protection of water quality.
Manages water resources naturally	▪ Criterion 8 of Policy GN 1 (General Development Policy) protects against significant adverse effect on water quality; and ▪ Policy GN47 (Water Quality and Protection of Water Resources) protects water resources, water quality, fisheries, nature conservation interests and water-related recreation; requires use of Sustainable Drainage Systems (SuDS) and protects flood plains.
Clean air	Criterion 2 of Policy GN 1 (General Development Policy) requires proposals to protect amenity in terms of odours, smoke, fumes, dust and air quality.

Reduces overall pollution	▪ Policies GN 1 (General Development Policy) and GN 2 (Sustainable Design and Placemaking) prescribe general principles for all development to deliver sustainable development and reduce overall pollution. ▪ Policy GN47 (Water Quality and Protection of Water Resources) protects water resources, water quality, fisheries, nature conservation interests and water-related recreation; requires use of Sustainable Drainage Systems (SuDS) and protects flood plains.
Resilient to climate change	Policies GN 1 (General Development Policy) and GN 2 (Sustainable Design and Placemaking) prescribe general principles for all development to deliver sustainable development which take climate change into account.
Distinctive and special historic environments	Policy GN 28 (Protection and Enhancement of the Historic Environment) recognises the scale and significance of the historic environment in Pembrokeshire and aims to ensure the protection, preservation and enhancement of historic assets.
Facilitating Accessible and Healthy Environments	
Outcome	Plan Response
Accessible and high-quality green space	▪ Amenity open space and recreational open space is identified on the Proposals Map and protected under Policy GN 51 (Protection and Creation of Outdoor Recreation Areas) ▪ Recreational Open Space provision within recreational allocations will be required, where applicable. Financial contributions towards off-site provision may also be required.
Accessible by means of active travel and public transport	▪ Majority of development is directed to settlements where public transport and active travel options are more readily available;
Not car-dependent	▪ Majority of development is directed to settlements where public transport and active travel options are more readily available.
Minimises the need to travel	▪ Majority of development is directed to settlements with reasonable provision of facilities and services to support day to day needs.
Provides equality of access	▪ Majority of development is directed to settlements where public transport and active travel options are more readily available.
Feels safe and inclusive	▪ Policy 1 (General Development Policy) provides a list of requirements for all proposals to ensure that development is appropriate for the immediate location and its wider setting/context; ▪ Policy 2 (Sustainable Design and Placemaking) promotes good and sustainable design which creates an inclusive and accessible environment for users that addresses community safety and encourages walking and cycling.
Supports a diverse population	▪ The Plan provides for a range of development opportunities (housing, employment, community facilities

	etc.) alongside safeguarding/protecting the environment, which can support the population's needs. An Equality Impact Assessment has also been undertaken.
Good connections	▪ Policy 2 (Sustainable Design and Placemaking) promotes good and sustainable design with good quality public realm integrating well with adjoining streets and spaces; ▪ Policy 3 (Infrastructure and New Development) requires the infrastructure needed by development is delivered, including open space, sustainable transport facilities, education, community and cultural facilities and broadband.
Convenient access to goods and services	▪ Majority of development is directed to settlements with reasonable provision of facilities and services to support day to day needs. ▪ Protection of town centres and local retail centres (Policy GN 31 (Town Centre and Local Retail Centre Development)); ▪ Policy GN 29 (Community Facilities) directs new community facilities to locations within or well related to the communities they will serve and are accessible by public transport and active travel means. It also protects against unnecessary loss of existing community facilities; ▪ Allocation of land for 2 new schools (Policy GN 30 (Community Facility Allocations)).
Promotes physical and mental health and well-being	The Plan makes provision for the delivery of new homes, including affordable housing, employment creation and takes into account education facilities. It ensures that new development will be required to be well located, designed and well laid-out. Proposals are required to be supported by adequate amenity and recreational open space and local amenity is taken into consideration. Accessibility by public transport and active travel modes is encouraged and the countryside and protected areas are safeguarded from unnecessary development.
Growing Our Economy in a Sustainable Manner	
Outcome	Plan Response
Fosters economic activity	▪ Policy SP 5 (Support Prosperity) sets out the Plan strategy to create 1,970 new jobs with an additional 1,000 further jobs arising from operation of the Celtic Freeport; ▪ Land is allocated in Policy SP 14 (Strategic Employment Provision) and Policy GN 9 (Employment Allocations) for a wide range and size of employment uses; ▪ Existing employment land is protected for new employment uses (Policy SP 15 (Safeguarding of Existing Strategic Employment Sites) and Policy GN 11 (Protection of Employment Sites and Buildings)); ▪ Policy GN 31 (Town Centres and Local Retail Centre Development) encourages the regeneration of Town Centres for new retail and commercial development;

	▪ Policy SP 13 (Port and Energy Related Development and Celtic Freeport) directs proposals for appropriate industrial and port-related facilities to the Ports of Milford Haven and Fishguard and to the Haven Waterway Enterprise Zone; ▪ Policies SP 17 (Visitor Economy), GN 54 (Visitor Attractions and Leisure Facilities, GN 55 (Serviced and Hotel Accommodation), GN 56 (Caravan, Camping and Chalet Development and GN 58 Self-Catering Accommodation provide an appropriate level of support for tourism which is a major part of the local economy.
Enables easy communication	▪ Policy 2 (Sustainable Design and Placemaking) promotes good and sustainable design with good quality public realm integrating well with adjoining streets and spaces; ▪ Policy 3 (Infrastructure and New Development) requires the infrastructure needed by development is delivered, including open space, sustainable transport facilities, education, community and cultural facilities and broadband; ▪ Policy GN 27 (Broadband and Telecommunications on New Developments) allows for the development of excellent broadband connectivity.
Generates its own renewable energy	Policy GN 5 (Renewable Energy – Target and Allocations) sets a target provision of renewable energy capacity and allocates sites for renewable energy technology.
Vibrant and dynamic	The LDP Vision sets out what LDP2 is intended to achieve by its end date of 2033. The outcomes are ambitious but reflect positive change to benefit the social, economic and environmental elements across the Plan area.
Adaptive to change	The process that regulates Plan production requires that Plans are reviewed regularly to ensure that they remain up-to-date and relevant. LDP2 is intended to manage change of the Plan area to achieve the overall Vision and Objectives and flexibility is built into the Strategy: ▪ Policy SP 2 (Housing Requirement) makes provision for 6,425 dwellings during the Plan period to enable delivery of 5,840 dwellings; ▪ Policy SP 5 (Supporting Prosperity) allocates employment land to support delivery of 1,970 new jobs, but additional land is also available in the form of existing employment sites that are safeguarded from other forms of development; ▪ The generic policies of the Plan are sufficiently flexible to take change into account.
Embraces smart and innovative technology	▪ Policies SP 14 (Strategic Employment Provision) and GN 9 (Employment Allocations) allocate land for employment uses, some of which is suitable for the development of high-tech business use; ▪ Criterion 9 of Policy GN 2 (Sustainable Design and Placemaking) requires provision of electric-vehicle

	charging points for residential and appropriate commercial developments; ▪ Policies GN 5 (Renewable Energy – Target and Allocations) and GN 6 (Development Proposals in Pre-Assessed Areas for Wind Energy) provide a policy context for the provision of renewable energy developments; ▪ Policies GN 26 (Telecommunications and Digital Technology Infrastructure) and GN 27 (Broadband and Telecommunications on New Developments) provide a policy context for the consideration of mobile telephony and digital technology infrastructure, recognizing that it is a critical element of modern-day life.
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10.Site Selection ✓

10 What was the methodology underlying the site selection process? Are the resultant allocated sites:

- a) In sustainable locations and generally free from physical constraints, such as land ownership, infrastructure, access, ground conditions, flood risk issues, pollution, landscape, biodiversity and heritage designations? and
- b) Attractive to the market (both private and/or public sector) for development, able to accommodate the policy and infrastructure requirements set out in the Plan, viable, and deliverable during the Plan period?

10.1. The Council has published an LDP 2 Candidate Site Assessment Methodology⁵⁰, which is available to view on its website.

10.2. The Candidate Site assessment⁵¹ is a phased process and this has involved:

- Initial registration;
- A phase 1 assessment looking at each site in the context of GIS constraints;
- A phase 2 assessment looking at compatibility with the LDP 2 Preferred Strategy;
- A phase 3 assessment involving consultation with various internal departments at PCC and with key external organisations;
- A phase 4 assessment looking at landscape and biodiversity;
- A phase 5 assessment looking at deliverability.

10.1. There is a table on page 5 within the methodology paper that sets out what happened at each stage.

PCC Candidate Site Assessment Methodology:					
Initial Registration	Phase 1 Assessment	SA/HRA Assessment (On-going through all stages) Phase 2 Assessment	Phase 3 Assessment	Phase 4 Assessment	Phase 5 Assessment
• Sites sorted by size • Use type • Mapped • Previously Developed Land or Greenfield? • Affordable Housing submission? • Custom build/self-build?	• GIS mapping against constraints layer showing impact on: -Flood risk -Site of Special Scientific Interest -Special Area of Conservation -Listed Building -Scheduled Ancient Monument -Minerals -Conservation Area -Historic Park/garden -Contaminated land - Other safeguarding • Level of site area affected noted. Assessment against relevant PPW & TANS recorded.	• Assess against the Preferred Strategy • Housing – overall level of growth and relationship to spatial strategy. • Position in hierarchy/spatial grouping • Other uses – specific requirements from National Policy/relevant evidence base.	• Consultation with internal departments and key organisations: • Hywel Dda Health Board • National Resources Wales • Dwr Cymru • WG Agricultural land body • Highways • Trunk Roads • Public Protection • Education • Dyfed Archaeological Trust • Listed Building Officer • Property Team • Regeneration Team	• Landscape and Biodiversity • How does the site relate to the landscape, landform and other site features? • Does the current habitat provide valuable ecosystem service? • Is loss of protected woodland/trees/hedgerows proposed? • Are there protected or locally important species or habitats present? • Presence of species/watercourse • Is the site itself at risk of flooding or causing pollution?	• Connections for Electricity and water • Sewerage capacity • Land owner intent • Land ownership • Legal obstacles to delivery • Viability • Transportation links • SUDs compliant?

10.2. they are compliant with the Preferred Strategy, which was published in December 2018. A colour coding system was created to indicate the extent to which a site proposed was considered to comply with the Preferred Strategy.

10.3. Phases 3 and 4 allowed for a more detailed appraisal of the sites' suitability when considered against the detailed advice of consultees and advisers.

⁵⁰ <https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base>

⁵¹ <https://www.pembrokeshire.gov.uk/local-development-plan-review/candidate-sites>

- 10.4. Phase 5 was informed in part by the Financial Viability Report⁵² prepared by Burrows-Hutchinson Ltd which responds to the guidance in the Development Plans Manual, which requires a Local Planning Authority (LPA) to undertake a high level viability appraisal to assess the broad levels of development viability in different housing market areas, which could result in a range of affordable housing percentages being sought across the LPA area. Proposers were invited to submit viability testing information which would demonstrate commitment by the site developers to progress the site's development.
- 10.5. Local Development Plan 2's Preferred Strategy included exploring options for its preferred growth levels and distribution and this has also been subject to a Sustainability Appraisal, incorporating SEA, which has assessed the likely sustainability and significant environmental effects of all substantive components of the Plan (strategy (and any identified reasonable alternatives), policies. The proposed site allocations themselves have also been subjected to a Sustainability Appraisal and mitigation proposed where potential negative impacts were identified (See response to Question 2 earlier).
- 10.6. Local Development Plan 2 has also been subject to a Habitats Regulations Assessment where the appropriateness of the Plan's allocations has been considered (see response to Q 3 earlier).
- 10.7. Site proposers have also had an opportunity to comment on LDP2's Housing Trajectory in terms of the likely timing of delivery. Some have raised issues in relation to this which are dealt with as part of the representations received on the LDP 2 Deposit Plan 2 consultation.
- 10.8. The review of the employment sites for LDP 2 was driven by the conclusions of the Two County Economic Study⁵³, with strategic allocations and existing strategic sites for safeguarding split for Deposit Plan 2, with some adjustments also made to the local allocations. Submission of Candidate Sites assisted in some cases, but many major players (and some local ones) stayed silent. Deliverability of employment sites often links to financial incentives, so the Haven Waterway Enterprise Zone and Swansea Bay City Deal are of some significance, with Celtic Freeport potentially being more so looking ahead.
- 10.9. The Council is preparing draft Supplementary Planning Guidance for all site allocations, in consultation with statutory undertakers to provide key information for landowners/developers about each site, including infrastructure requirements, planning obligations and any need for mitigation to address constraints.

⁵² https://www.pembrokeshire.gov.uk/objview.asp?object_id=11531&language= Financial Viability Report 2024

⁵³ <https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base> See under 'Economy'

11. Supplementary Planning Guidance ✓

Will the DP be supported by supplementary planning guidance? If so, what subjects will be addressed? What are the timescales for the adoption of the guidance? How will it assist in the delivery of the Plan? ✓

11.1. The Pembrokeshire County Council LDP 2 will be supported by Supplementary Planning Guidance. There are numerous references to SPG in LDP 2, Deposit Plan 2 and Appendix 3 to the Plan sets these out in tabular format. That table refers to the policy, reference, topic, whether existing SPG is to be carried forward (subject to updating), whether it is completely new SPG and what the timescale is for preparation and adoption.

11.2. Currently, 22 items of SPG are identified in Appendix 3, these covering the following topics:

- Development Sites and Infrastructure – linked to policies GN 1 and GN 16
- Caravan, Camping and Chalet Landscape Capacity Assessment – linked to policies GN 56 and GN 57
- Affordable Housing – linked to policy GN 20
- Planning Obligations – linked to policy GN 3
- Biodiversity – linked to policies SP 11, GN 1, GN 41, GN 44
- Renewable Energy – linked to policy GN 4
- Green Infrastructure – linked to policy GN 45
- Lighting and Dark Skies – linked to policy GN 1
- Landscape Character Assessment – linked to policy SP 11
- Seascape Character – linked to policy SP 11
- Historic Environment (Archaeology) – linked to policy GN 28
- Cumulative Impact of Wind Turbines on Landscape and Visual Amenity – linked to policy GN 4
- Parking Standards and ULEV Charging Points – linked to policies GN 1 and GN 2
- Second Homes and Short-term lets in the Plan area – linked to policy GN 15
- Residential design – linked to policy GN 15
- Water quality and protection of water resources – linked to policy GN 47
- Slade Lane, Haverfordwest, masterplan – linked to policies GN 16 and GN 18
- Masegwynne, Fishguard, masterplan – linked to policies GN 16 and GN 19A
- South of Conway Drive, Castle Pill Road, Steynton, Milford Haven, masterplan – linked to policies GN 16 and GN 19B
- Celtic Freeport – linked to policy SP 13
- Development Brief for Cawdor Barracks including the former Brawdy Airfield – linked to policy GN 7
- Prior Extraction Requirements (Mineral Resource) – linked to policy GN 38

11.1. As well as listing the topics proposed for SPG and the policies on which these items of SPG will elaborate, the table in Appendix 3 also advises on whether each item of SPG is to be carried forward from the existing Plan (subject to updating) or alternatively,

whether it is new SPG. There is also a column which sets out the timescale for preparation and adoption in each case. In most cases, the updating / preparation of new SPG will follow LDP 2 adoption, but in the case of the Caravan, Camping and Chalet Landscape Capacity Assessment SPG, PCC consulted on this alongside LDP 2, Deposit Plan 2, although it will not be able to adopt this until after LDP 2 adoption taking account of the outcomes of the Examination process. Also, it is anticipated that a draft version of the Development Sites and Infrastructure SPG will be available to inform the Examination stage of the Plan process, although currently it is under preparation (June 2025) and has not been subject to public consultation.

- 11.2. It is anticipated that some of these items of SPG will be prepared jointly with the Pembrokeshire Coast National Park Authority. Appendix 3 advises that this may include the Lighting and Dark Skies SPG (which would be a completely new item of SPG) and the Seascape Character SPG (where there is an existing, jointly prepared, SPG from 2023). The National Park Authority is currently moving forward on Lighting and Dark Skies SPG on a single authority basis. There may still be opportunities for joint working with PCC in the future but at present it looks unlikely. Please see response to Q ran regarding Lighting and Dark Skies SPG to address this issue. There may be further opportunities for joint working with the National Park Authority on various items of SPG in the future and it is worth recording that the current SPG items on Cumulative Impact of Wind Turbines on Landscape and Visual Amenity (2022), on Biodiversity (2021) and on Planning Obligations (2016) were also jointly prepared with the National Park Authority.
- 11.3. Information on how each item of SPG is expected to assist with the delivery of LDP 2 is included within the reasoned justification of the various policies to which these items of SPG are linked.

12. Provision of Housing ✓

What is the DP's strategy for the provision of housing? Is it appropriate to meet the needs of the area over the Plan period?

12.1. The Council has a preferred strategy where the level of housing growth – Policy SP 2 Housing Requirement - is considered appropriate (see Question 0 below) for the following reasons:

- It is deliverable (in line with historic build rates).
- It will assist in meeting the significant backlog of affordable housing need
- It will support the local building industry and wider economy
- It is projected to deliver a more balanced population profile than that projected with lower growth levels.
- It scores positively in terms of the Sustainability Appraisal (see answer to Question 2 above)

12.2. In terms of the strategy's distribution of growth (including housing growth), growth is distributed across the Plan area in accordance with a spatial strategy which promotes sustainable development in what is predominantly a rural County, albeit with several important urban centres. As part of this a Settlement Hierarchy groups settlements into different categories, depending on the levels of services and facilities located within them. The greatest levels of growth (housing sites of 5 or more) are in settlements which are at a Service Village level or higher within the Settlement Hierarchy. Within the Settlements, opportunities to develop previously developed land have been identified and included within boundaries where appropriate, in line with guidance in Planning Policy Wales. Settlements are identified on the Key Strategy Diagram on page 38 of LDP 2 Deposit Plan 2.

12.3. The Local Development Plan delivers a strategy of 60% / 40% Urban / Rural split of housing allocations (sites over 5 units). This is broadly in line with the current population split in Pembrokeshire. The advantages of this approach are that it offers growth opportunities to both urban and rural communities, while still favouring the most sustainable locations for future development in the towns. The table below is taken from the table in paragraph 4.31 of the LDP2 which shows that at every level of the hierarchy this Plan provides opportunities for housing. Conversion opportunities are also available in countryside locations.

Policy	Urban Settlements	Service Centres	Service Villages	Local Villages
Housing Allocations	✓	✓	✓	
Windfall market housing	✓	✓	✓	✓
Local need affordable housing	✓	✓	✓	✓
Exception sites for affordable	✓	✓	✓	✓

- 12.1. The actual distribution of housing growth proposed is identified in Appendix 2 Table A Housing Land Supply Table A to the Local Development Plan 2. There is also a Table (Table B) identifying the timing of delivery for housing allocations and Table C which covers land with planning permission. Table D provides a trajectory for review which demonstrates the likely annual supply to be expected from the various housing components demonstrating that a continuous supply is being programmed. Table F provides a summary of spatial distribution of housing and from what sources of supply. The opportunities are provided primarily through housing allocations, planning permissions and windfall opportunities including the conversion of properties.
- 12.2. The Local Housing Market Assessment (LHMA), the latest version of which is for 2023⁵⁴ informs the setting of the affordable housing provision – Policy SP 3 Affordable Housing Provision sets out a target of 2000 units. The target provision is based on historic and anticipated levels of delivery of affordable housing rather than on the level of need. The scale of affordable housing needed in Pembrokeshire is significantly greater than can be provided through current levels of Welsh Government Social Housing Grant. The planning system, using planning obligations, can contribute towards the provision of an affordable housing figure of 2000 target provision (125 per annum). This provision can be achieved as part of the housing allocations coming forward in the Plan – Policy GN 16 Residential Allocations, Policy GN 17 existing Residential Commitments and through windfalls under Policy GN 20 Local Needs Affordable Housing. Policy GN 21 Exception Sites for Local Needs Housing can also provide opportunities.
- 12.3. Policy SP 3 Affordable Housing Provision reasoned justification provides details on the expectation for the percentage of affordable that is required to be social rented housing and what is required to be intermediate type products (see FC4.SP03.01 – copied below).

15 Year Affordable Housing Estimate Table 4 page 89 of the LHMA Draft 2023 (as at March 2025)*	Annual Requirement Estimate	%	Estimate 10 years (2023 to 2033)
Social Rented **	177	74%	1770
Intermediate **	61	26%	610
Totals	238	100%	2380
* net of planned supply which will overlap with GN 16 Residential Allocations and GN 17 Commitments Based originally on a Pembrokeshire Growth Scenario of 435 per year reduced to provide for Pembrokeshire planning jurisdiction** see Glossary of Terms for the definition of affordable housing			

- 12.4. Policy GN 15 Housing Mix, Second Homes and Short-term Holiday Lets, Space Standards and Requirements for Lifetime Homes Standards sets out requirements in terms of ensuring:
- housing types, tenures and bedroom numbers addressing identified needs;
 - there is an appropriate balance between primary and secondary residences and short term lets;

⁵⁴ https://www.pembrokeshire.gov.uk/objview.asp?object_id=12043&language= Local Housing Market Assessment 2023.

- the design and layout of new properties are meeting needs for adaptation as highlighted in the Local Housing Market Assessment.

12.5. Policy GN 22 Specialist and Supported Accommodation and Policy GN 23 Specialist and Supported Accommodation Allocations seek to address the specific specialist and supported needs of the County⁵⁵ and the Local Housing Market Assessment as set out in paragraph 5.124 to 5.128 (plus a new proposed paragraph as a Focussed Change - FC5.GN22.02) of the LDP 2 Deposit Plan's reasoned justification.

12.6. See also Q 0 below regarding Gypsy Traveller provision for the Plan area.

⁵⁵ [https://www.wwcp.org.uk/wp/wp-content/uploads/2019/02/West Wales CP Older Peoples Housing Need Assessment Housing LIN-Final.pdf](https://www.wwcp.org.uk/wp/wp-content/uploads/2019/02/West%20Wales%20CP%20Older%20Peoples%20Housing%20Need%20Assessment%20Housing%20LIN-Final.pdf) [https://www.wwcp.org.uk/wp/wp-content/uploads/2019/02/WWCP LD Housing Assessment HousingLIN.pdf](https://www.wwcp.org.uk/wp/wp-content/uploads/2019/02/WWCP_LD_Housing_Assessment_HousingLIN.pdf)

13.Housing Requirement ✓

What is the LDP's housing requirement figure (HRF)? How has it been calculated?

- 13.1. The Council undertook a review of demographic and household formation patterns for the Plan area. A Demographic Forecasts Paper (July 2018) and a Demographic Forecasts Paper Addendum (December 2018) provided a range of demographic forecasts based on the Welsh Government's 2014 based household projections⁵⁶ and was published as part of the evidence base for the Preferred Strategy and 1st Deposit LDP. This 2nd Deposit LDP uses the most up to date Welsh Government Household Projections from 2018. Analysis of the demographic scenarios of demographic-led and dwelling-led options is presented in the Demographic Forecasts Update 2020 prepared by Edge Analytics (see weblink below). Using the scenarios that were chosen for the Preferred Strategy and updating the figures for the PG Long Term (2018 based projection) and dwelling-led 5 year average and 10 year average resulted in updated preferred growth options⁵⁷:
- 13.2. The housing requirement to deliver 5,840 new homes over the Plan period 2017 to 2033 equates to the delivery of 365 new dwellings per annum. A 10% flexibility allowance has been applied, increasing the total provision to 6,425 dwellings in order to deliver the requirement. The growth scenario has been identified by taking the average of the following three scenarios:
- WG 2018 based Long Term Population Projection which forecasts a need for 295 dwellings per annum; (Preferred Strategy, Deposit 1 = 408 per annum)
 - Dwelling-led, 5 year average completion rate from 2014/15 to 2018/19 of 413 dwellings per annum; (Preferred Strategy, Deposit 1 = 443)
 - Dwelling-led, 10 year average completion rate from 2009/10 to 2018/19 of 378 dwellings per annum. (Preferred Strategy, Deposit 1 = 416)
- 13.3. The housing requirement for Deposit Plan 2 is within the range delivered historically by the local building industry and the Authority is confident that it represents a deliverable target. The requirement is higher than the Welsh Government's 2018-based Household Projections to support greater levels of affordable housing and will also support the local economy and building industry to a greater extent, than delivering the housing requirement identified by the Welsh Government projection.

⁵⁶ <https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base> - see under 'Demographic Forecasts/Housing Supply'

⁵⁷ The Deposit 1 Plan proposed 425 dwellings per annum -Total Housing Requirement over 16 year plan period 6,800 dwellings

14. Household & Population Projections✓

In defining the HRF, was adequate regard paid to the latest household and population projections? Was consideration given to the main local influences on housing demand in the area (including household formation rates, migration levels, and household conversion ratios etc.)?

- 14.1. Please see the response above regarding the derivation of the Housing Requirement Figure in terms of local influences, in particular.
- 14.2. The document 'Pembrokeshire Updating the LDP Demographic Evidence December 2020'⁵⁸ – Appendix E sets out in detail the approach taken in terms of the above matters.
- 14.3. In each scenario, historical population statistics are provided by ONS mid-year population estimates (MYE), with all data disaggregated by five-year age and sex. The WG scenarios use MYE populations up until their respective 2014 and 2018 base years. Each of the PG and Dwelling-led scenarios uses an ONS 2018 MYE as its base year.
- 14.4. In each scenario, historical mid-year to mid-year counts of births by sex have been sourced from the ONS MYEs, aggregated and apportioned from Census Output Area geographies. Under the WG scenarios, historical births counts have been used until each scenario's base year.
- 14.5. In each scenario, historical mid-year to mid-year counts of deaths have been sourced from the ONS MYEs. Under the WG scenarios, historical deaths counts have been used until each scenario's base year.
- 14.6. Other than Census statistics, there are no historical migration statistics available at a sub-district level. Therefore, migration is calculated as the 'residual' of the population after taking account of births and deaths. 'Net migration' equates to the cumulative impact of the four types of migration modelled within POPGROUP (in-migration, out-migration, immigration and emigration). Using the Census statistics, historical estimates of migration are derived for the study area. This is achieved by comparing the migration implied by the schedule of rates for all areas (in this case, the schedule from the WG 2018-based SNPP for the district of Pembrokeshire) with the pattern of migration observed for wards in the Census statistics. Once the historical estimates have been derived, under the Dwelling-led and PG Long Term scenarios a weighted average of the last seventeen years of estimated migrant counts (2001/02–2017/18) is used directly as input to scenario forecasts.
- 14.1. Apart from the Dwelling-led scenario, the household and dwelling implications of each population growth trajectory have been estimated through the application of household membership rates, communal population statistics and a dwelling vacancy rate. These assumptions have been sourced from the 2011 Census and the WG's 2018-based household projection model. In the Dwelling-led scenarios, these assumptions are used to determine the level of population growth required by the defined dwelling growth trajectory.

⁵⁸ <https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base> - see under 'Demographic Forecasts/Housing Supply'

14.2. The membership rates are used to calculate the proportion of the household population in each household category by age group and sex, taken from the WG household model. The household population is converted into households using average household size assumptions, taken from the household model.

15. Growth Options ✓

Were alternative housing growth scenarios considered? If so, what alternative scenarios were they, why were they discounted, and why was the preferred option selected?

- 15.1. Yes alternative growth scenarios were considered. The evolution of the LDP from Preferred Strategy to Deposit Plan 2 stage can be found in the Housing Requirement Background Paper 2023.⁵⁹
- 15.2. The LDP 2 Preferred Strategy was consulted upon between 17 December 2018 and 4 February 2019. The Preferred Strategy contained Policy SP 2 Housing Requirement, which set out a requirement for 6,800 dwellings over the Plan period (2017-2033) (425 per year). The plan would make provision for 7,820 dwellings which equates to a 15% flexibility allowance to account for any non-delivery or unforeseen circumstances.
- 15.3. The housing requirement in the Preferred Strategy was based on demographic analysis and consultation with stakeholders on a range of options. The authority commissioned Edge Analytics to consider a range of demographic scenarios based on the Welsh Government's 2014 based population and household projections and rebased on the 2016 mid-year estimates.
- 15.4. Edge Analytics developed a range of possible growth scenarios based on the demographic analysis of the 2014-based Household Projections to inform LDP 2 in two reports; Pembrokeshire Demographic Forecasts, July 2018 and Additional Scenario Analysis, December 2018.
- 15.5. The Edge reports presented the 2014 Principal projection and three demographic scenarios based on variant migration histories and assumptions, including a net nil migration scenario. Three dwelling-led scenarios were also presented in July 2018 report. An additional scenario analysis was presented as an addendum to the July 2018 report (December 2018) which considered two additional forecasts; a dwelling-led scenario and an employment-led scenario. All the scenarios are summarised in the table below:

Scenario	Annual Net migration	Housing Requirement over 16 year period	Average dwelling requirement
WG 2014 (rebased) Principal WG 2014 based population for Pembrokeshire, rebased to the latest 2016 Mid Year Estimate.	386	3,132	196 dpa
PG 10 year	626	5,445	340 dpa

⁵⁹ <https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base> - See under Demographic Forecasts Housing Land Supply.

Demographic trend scenario using migration assumptions from a 10 year 2006/07-2015/16 migration history.			
PG Long Term Demographic trend scenario using migration assumptions from a 15 year 2001/02-2015/16 migration history.	767	6,529	408 dpa
Net Nil Demographic trend scenario using migration in and out are balance resulting in zero net migration.	0	93	6 dpa
Dwelling-led (LDP 1 target) Dwelling-led scenario using the annual dwelling requirement from the adopted LDP 1 of 572 dwellings per annum.	1,099	9,152	572 dpa
Dwelling-led (5 year average) Dwelling-led scenario using the annual dwelling completions of 443 per year based on completions between 2012 and 2017.	842	7,085	443 dpa
Dwelling-led (10 year average) Dwelling-led scenario using the annual dwelling completions of 416 per year based on completions between 2007-2017.	789	6,658	416 dpa
Dwelling-led (425 dpa) Dwelling-led scenario using the annual dwelling completions of 416 per year.	807	6,800	425 dpa
Employment-led Employment trend scenario using an annual employment growth target from the Experian (Sept 2018) economic forecasts. The link between employment growth and population change is estimated using three key economic assumptions; economic activity rates, commuting ration and unemployment rate.	330	3,056	191 dpa

15.6. The Preferred Growth Option was influenced by a combination of the following three options:

- PG Long Term projection which is a demographic scenario which includes migration assumptions based on the last 15 years of migration history from 2001/02 – 2015/16. Basing growth on the past 15 years migration trends, means that a period pre-recession is included in the figures and that recent ‘blips’ in population movements associated with for example, the closure of a large employer in 2014 (the Milford Haven Refinery) are averaged out” (Preferred Strategy, paragraph 5.3). This scenario results in a requirement for 408 dwellings per annum.
- Dwelling-led (5 year average) scenario of 443 dwellings over the 5 year period 2012 to 2017
- Dwelling-led (10 year average) scenario of 416 dwellings over the 10 year period 2007 to 2017.

15.7. The mean average of the three scenarios is 422 dwellings per year which formed the preferred growth option of delivering 425 dwellings per year.

15.8. The Preferred Strategy figure was a higher requirement than the Welsh Government 2014 (rebased projections). It was identified following consideration of the average build rates in Pembrokeshire over the previous 5 and 10 years. Stakeholders supported the higher figure on the basis that:

- It is deliverable (in line with historic build rates).
- It reflects longer term migration trends, which is appropriate given the closure of a major employer in Pembrokeshire in 2014 (which will have impacted on the 5 year migration figures).
- It will assist in meeting the significant backlog of affordable housing need and will make a greater contribution than a growth option based only on WG projections.
- It will support the local building industry and wider economy and will make a greater contribution than a growth option based only on WG projections.
- It will deliver a more balanced population profile than that projected with lower growth levels.
- 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.

15.9. The Deposit Plan 1 was consulted upon from January to March 2020. Policy SP 2 Housing Requirement set out that the preferred growth option was to deliver 6,800 dwellings (425 dpa), which was the same as the Preferred Strategy’s Housing Requirement. Provision was made for 7,480 dwellings which is a 10% flexibility in order to deliver the housing requirement.

15.10. The Welsh Government raised an objection (Category B) to level of Growth identified in the Deposit 1 Plan – “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.” They added: Category B – *“The plan seeks to deliver a requirement 6,800 homes and 2,200 new jobs over the 16 year plan period, with a housing provision for 7,480*

dwellings. The authority commissioned Edge Analytics to consider a range of demographic scenarios based on the Welsh Government's 2014 based population and household projections (and rebased on the 2016 mid-year estimates) dwelling-led scenarios and an employment-led forecast. The authority should reconsider these scenarios in light of the 2018 based population and household projections and the declaration of the climate emergency”

- 15.11. Following publication of the Deposit Plan, the preparation timescale was delayed, initially due to the Covid-19 pandemic and in January 2021, new guidance on phosphate levels for Riverine (non-tidal) Special Areas of Conservation (Riverine SACs) was published which had implications on the delivery of some potential development sites in the affected areas that were included in the Deposit 1 plan.
- 15.12. It was agreed at Full Council on 9 December 2021 that the authority would repeat the Deposit stage of the Plan process, but based on a revised Plan, taking account of the phosphates issue and also other important matters, including Brexit, the Covid-19 pandemic and the publication of FW and PPW edition 11. A detailed analysis of these matters can be found in the Housing Requirement Background Paper 2023, Section 3.
- 15.13. Edge Analytics was re-commissioned to provide demographic analysis of the most recent, 2018-based WG population and household projections, published in August 2020.

	Scenario	Annual Net migration	Housing Requirement over 16 year period	Average dwelling requirement
1.	WG 2014 (rebased) Principal WG 2014 based population for Pembrokeshire, rebased to the latest 2016 Mid Year Estimate.	386	3,132	196 dpa
2.	WG 2018 WG 2018 based Principal Population Projection for Pembrokeshire.	688	4,336	271 dpa
3.	WG-2018 (HIGHPOP) WG 2018 based High Population Projection for Pembrokeshire.	736	5,008	313 dpa
4.	WG-2018 (LOWPOP)	641	3,456	216 dpa

	WG 2018 based Low Population Projection for Pembrokeshire.			
5.	PG Long Term Uses ONS 2018 MYE and migration assumptions from a 17 year 2001/02-2017/18 migration history.	771	4,720	295 dpa
6.	PG Long Term (Fert H Mort H) Uses ONS 2018 MYE base year and calibrates its migration assumptions from a 17 year 2001/02 – 2017-2018 migration history and fertility and mortality assumptions from the WG 2018 based High Population variant scenario.	771	5,072	317 dpa
7.	PG 10 year Uses ONS 2018 MYE base year and calibrates migration assumptions from a 10 year 2008/09-2017/18 migration history	556	3,056	191 dpa
8.	PG 2 year Uses ONS 2018 MYE base year and calibrates migration assumptions from a 2 year 2016/17-2017/18 migration history.	749	4,688	293 dpa
9.	Net Nil Demographic trend scenario using migration in and out are balance resulting in zero net migration.	0	-1184	-74 dpa
10.	Dwelling-led (425) Dwelling-led scenario using an annual dwelling	1,047	6,800	425 dpa

	requirement of 425 dwellings per annum (Preferred Strategy Option).			
11.	Dwelling-led (5 year average) Dwelling-led scenario using an annual dwelling completion rate of 413 dwellings per year based on completions between 2014/15 and 2018/19.	1,023	6,608	413 dpa
12.	Dwelling-led (10 year average) Dwelling-led scenario using an annual dwelling completion rate of 378 dwellings per year based on completions between 2009/10-2018/19.	955	6,048	378 dpa

15.14. Contextually, since the Deposit Plan 1 was consulted on in 2020 there were a number of reasons to lower the housing requirement for Pembrokeshire's Re-Deposit LDP 2:

- The latest 2018 based Household Projections capture an increased net migration rate but natural change is forecast to decrease significantly over the plan period.
- The Census 2021 recorded lower population growth in Pembrokeshire than anticipated with the 2020 Mid Year Estimates being 2% too high.
- In 2019 both the Welsh Government and Pembrokeshire County Council voted to declare a Climate Emergency. Reducing the housing growth strategy would result in lower carbon emissions.
- The publication of new guidance on phosphates in Riverine Special Areas of Conservation in Wales by Natural Resources Wales in January 2021 has resulted in the loss of approximately 430 dwellings, comprising of 254 units on allocations and 180 windfall units.
- Housing delivery in the first 6 years of the LDP 2 plan period has been delivered at an average of 337 dwellings per annum, which is significantly below the Deposit 1 target of 425 dwellings per annum.

15.15. However, lowering the housing requirement also needs to be balanced against;

- The need to address the large backlog of affordable housing need identified in the Local Housing Market Assessment
- The need to achieve a more balanced population profile
- The successful bid for the Celtic Freeport

15.16. The 2nd Deposit LDP utilises the most up to date Welsh Government Household Projections from 2018. Analysis of the demographic scenarios of demographic-led and dwelling-led options is presented in the Demographic Forecasts Update

2020 prepared by Edge Analytics as set out in the Table above (12 options provided). Using the scenarios that were chosen for the Preferred Strategy and updating the figures for the PG Long Term (2018 based projection) and dwelling-led 5 year average and 10 year average resulted in an updated preferred growth option (Option 13).

15.17. Option 13: The housing requirement to deliver 5,840 new homes over the Plan period 2017 to 2033 equates to the delivery of 365 new dwellings per annum. A 10% flexibility allowance has been applied, increasing the total provision to 6,425 dwellings in order to deliver the requirement. The growth scenario has been identified by taking the average of the following three scenarios:

- WG 2018 based Long Term Population Projection which forecasts a need for 295 dwellings per annum; (Preferred Strategy, Deposit 1 = 408 per annum)
- Dwelling-led, 5 year average completion rate from 2014/15 to 2018/19 of 413 dwellings per annum; (Preferred Strategy, Deposit 1 = 443)
- Dwelling-led, 10 year average completion rate from 2009/10 to 2018/19 of 378 dwellings per annum. (Preferred Strategy, Deposit 1 = 416)

15.18 Also, in Question 2 Sustainability Appraisal  the response covers how 13 growth options were considered and the preferred growth option chosen (Preferred Option 13) provides a balanced approach in terms of impacts (see paragraph 1.16).

16. Housing Land Supply ✓

What is the DP's housing land supply figure and how has it been calculated?

16.1. LDP 2 Deposit 2 housing land supply is set out in Appendix 2 Housing Components and Trajectory, Table A Housing Land Supply. The derivation of the housing land supply is set out in detail in the Background Paper titled Housing Supply and Trajectory July 2024.⁶⁰

16.2. This Background Paper has been produced to identify, explain, and justify the components of housing supply to meet the housing requirement over the lifetime of the plan (5,840 dwellings up to 2033). The housing requirement to deliver 5,840 new homes over the Plan period 2017 to 2033 equates to the delivery of 365 new dwellings per annum. There is a 10% flexibility allowance which brings the total figure to 6,425 (SP 2 Housing Requirement).

16.3. There are several housing supply components, all of which must be assessed in combination, to inform delivery of the housing requirement. All housing supply components included in the Background Paper, and resultant trajectory have the same base date, of 31 March 2023. The total housing land supply estimated for the Plan area is **6470**⁶¹.

16.4. The components include:

i. **Dwelling Completions (to 31 March 2023) = 2017** All residential completions since the start of the Replacement LDP review period commenced (2017/18), split by large sites (5 or more units) and small sites (under 5 units) for clarity of presentation and analysis.

ii. **Dwellings Under Construction = 233** (as surveyed for the 2022/23 Housing Delivery Assessment) All residential units under construction, as surveyed for the 2022/23 Housing Delivery Assessment. This was based on a ground survey of all sites and a cross-check with building regulation applications where applicable.

ii. **Land Bank Commitments (Units with Planning Permission) = 898** All residential applications with planning permission in place that had commenced development or were due to commence development in the short-term.

iii. **Large Windfall Sites and Small Windfall Sites = 307 + 640** Windfall sites are not specifically allocated for housing but come forward for housing development in accordance with Plan policies. They are split into two categories: large windfalls (sites of 5 or more units) and small windfalls (sites of less than 5 units).

iv. **New Housing Allocations = 2,375** New sites for residential development that have been submitted as Candidate Sites, are supported by robust deliverability and viability information and have been subject to a rigorous Candidate Site Assessment.

⁶⁰ <https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base> See under 'Demographic forecasts/Housing supply'

⁶¹ See track changes updates to Appendix 2: Table A Housing Land Supply for the Deposit Local Development Plan 2 text to reflect Focussed Changes and any consequential edits identified as 'CE'

17.Housing Trajectory ✓

Is the housing trajectory set out in the DP realistic?

- 17.1. Yes, the total housing provision, spatial distribution thereof and the likely delivery of has been subject to detailed analysis in the Background Paper Housing Supply and Trajectory July 2024 as explained under Question 17.
- 17.2. In order to ensure that the timing and phasing of sites is robust and based on up-to-date information, the associated trajectory phasing tables have been developed through effective engagement with site promoters and the Housing Trajectory Stakeholder Group. (see Appendix 1 and 2 of the Background Paper).
- 17.3. The total housing provision, and spatial distribution thereof, has also been subject to site-specific phasing analysis to enable development of the housing trajectory. The trajectory was prepared initially through close dialogue with the respective site-promoters, followed by effective collaboration with a range of stakeholders at several annual Stakeholder Group Meetings.
- 17.4. The Stakeholder Group was established prior to Deposit Stage to discuss the timing and phasing of all sites with planning permission or allocated in the Plan, specifically to:
- Ensure completion figures are up to date and recorded correctly for large and small sites
 - Consider the anticipated annual delivery rates for sites with planning permission
 - Consider the anticipated annual delivery rates for housing allocations
- 17.5. At the last Stakeholder Group session (27/05/2022), no objections were raised regarding the completion figures, anticipated annual delivery rates for sites with planning permission and the anticipated annual delivery rates for the proposed housing allocations. As such, there are no outstanding matters of disagreement on the completion figures or the timing and phasing of sites in the plan period, all of which have been approved by the Stakeholder Group (paragraph 13.1 and 13.2 of the Background Paper).

18.Affordable Housing Strategy ✓

What is the DP's strategy for the provision of affordable housing? Has it been informed by a reliable and up-to-date market assessment (LHMA)? What scale, tenure and type of housing need was identified and how will this need be met over the Plan period?

18.1. Please see Q 12 paragraphs 12.2 above to 12.5 above which provides details on the Local Housing Market Assessment, the latest version of which is for 2023, and the scale and tenure and type of housing need. These paragraphs also describe how the need will be met over the Plan period.

19. Affordable Housing Target ✓

What is the DP's affordable housing target? How was it calculated? Does it maximise the opportunities for delivery? ✓

19.1. Please see Q 12 paragraphs 12.2 above to 12.5 above which provides details on the Local Housing Market Assessment 2023 and the scale and tenure and type of housing need. These paragraphs also describe how the need will be met over the Plan period.

19.2. The target for affordable housing delivery is 2,000 affordable dwellings over the Plan period. Appendix 1 to the Plan provides a breakdown of the projected provision. This has been updated as part of the Focussed Changes consultation (see FC6.App01.01).

Appendix 1: Affordable Housing Table

Affordable Housing Projections	A) Total completions (housing surveys 2017-2023)	B) Units under construction (as at April 2023)	C) Units with planning permission based on housing assessment 2023 with adjustment	D) RSL allocations	D) Non-RSL allocations	E) Large windfall sites (5+) for 2026-2033	E) Large windfall exception sites (5+) for 2026-2033	F) Small windfall sites (under 5 units) for 2024-2033	Total
Number of Units	553	74	251	796	153	31	197	0	2055

19.3. Column A) and B) are sourced from the LDP1 Annual Monitoring Report 2023. Column C) is taken from the survey undertaken for that Annual Monitoring Report. Column D) RSL allocations provides figures from proposed allocations under Policy GN 16 Residential Allocations with updates to take account of more recent knowledge on sites that are now owned by RSLs, along with information from the Housing Department on sites that has Social Housing Grant (SHG) allocated to, also known as Housing Programme Delivery Plan (PDP). Column E) Large Windfall sites (5+) for 2026-2033. It is estimated that of the 307 units forecast for delivery that 10% are likely to be affordable housing properties.

19.4. Opportunities to deliver affordable have been maximised by:

- a) using the Financial Viability Report 2024⁶² to determine the percentage of affordable housing that can be delivered on:
 - sites in the Plan area (depending on the site size and location). The Study responds to the guidance in the Development Plans Manual, which requires a Local Planning Authority (LPA) to undertake a high-level viability appraisal to assess the broad levels of development viability in different housing market areas, which could result in a range of affordable housing percentages. These percentages are set out in Policy GN 20 Local Needs Affordable Housing. This is referred to in the Report as High Level Assessments.

⁶² <https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base> - see under Heading 'Housing Viability'

- evidence from site-specific viability assessments that have been undertaken for candidate sites that are considered to be “key” to delivery of the LDP-2 strategy. These percentages can be found in Policy GN 16 Residential Allocations. This is referred to in the Report as ‘Viability Assessments for Key Sites’.
 - Using the High-Level Assessments to indicate levels of affordable housing provision expected in the remaining housing allocations in Policy GN 16 Residential Allocations. These figures can be adjusted to take account of localised information, for example, more detailed planning application proposals or permissions.
- b) Seeking opportunities to deliver higher percentages of affordable housing than the market would normally bear on sites in public ownership, for example some allocations have been identified for 100% affordable housing.
- c) Including policy to support exception sites provision (Policy GN 21 Exception Sites for Local Needs Affordable Housing).
- d) Including the requirement for commuted sums where on site provision is not possible - Where it is demonstrated that the provision of 2 or more affordable dwellings on site is not possible a commuted sum contribution for affordable housing will be sought. The commuted sum shall be related to the contribution rates set out above and charged on the basis of floorspace (per sq. metre). (Policy GN 20 Local Needs Affordable Housing).

20. Local Housing Market Assessment needs

Will the DP's affordable housing target meet the need for social rented and intermediate accommodation identified in the LHMA? If not, how will this need be met over the Plan period?

- 20.1 The Local Housing Market Assessment (LHMA), the latest version of which is for 2023⁶³ informs the setting of the affordable housing provision – Policy SP 3 Affordable Housing Provision sets out a target of 2000 units. The target provision is based on historic and anticipated levels of delivery of affordable housing rather than on the level of need.
- 20.1 In May 2023, 5,064 households were on the register. Numbers of those in the Gold and Silver bands (considered to be in need) were 3,242. These were the figures used to inform the 2023 LHMA. The scale of affordable housing needed in Pembrokeshire is significantly greater than can be provided through current levels of Welsh Government Social Housing Grant. The Common Housing Register is held by Pembrokeshire County Council. The planning system, using planning obligations, can contribute towards the provision of an affordable housing figure of 2000 target provision (125 per annum). This provision can be achieved as part of the housing allocations coming forward in the Plan – Policy GN 16 Residential Allocations, Policy GN 17 existing Residential Commitments and through windfalls under Policy GN 20 Local Needs Affordable Housing. Policy GN 21 Exception Sites for Local Needs Housing can also provide opportunities.
- 20.2 Policy SP 3 Affordable Housing Provision reasoned justification provides details on the expectation for the percentage of affordable that is required to be social rented housing and what is required to be intermediate type products (see FC4.SP03.01 – copied below).

15 Year Affordable Housing Estimate Table 4 page 89 of the LHMA Draft 2023 (as at March 2025)*	Annual Requirement Estimate	%	Estimate 10 years (2023 to 2033)
Social Rented **	177	74%	1770
Intermediate **	61	26%	610
Totals	238	100%	2380
* net of planned supply which will overlap with GN 16 Residential Allocations and GN 17 Commitments Based originally on a Pembrokeshire Growth Scenario of 435 per year reduced to provide for Pembrokeshire planning jurisdiction** see Glossary of Terms for the definition of affordable housing.			

⁶³ https://www.pembrokeshire.gov.uk/objview.asp?object_id=12043&language= Local Housing Market Assessment 2023.

21. Affordable Housing site specific targets ✓

How have the DP's site-specific affordable housing target(s) been defined? In which geographical locations will the target(s) apply? ✓

- 20.3 Details area-wide and site-specific affordable housing requirements can be found in Policy SP 3 Affordable Housing Provision sets out a target of 2000 units.
- 20.4 This provision can be achieved as part of the housing allocations coming forward in the Plan – Policy GN 16 Residential Allocations, Policy GN 17 existing Residential Commitments and through windfalls under Policy GN 20 Local Needs Affordable Housing. Policy GN 21 Exception Sites for Local Needs Housing can also provide opportunities.
- 20.5 The Financial Viability Report ⁶⁴ responds to the guidance in the Development Plans Manual, which requires a Local Planning Authority (LPA) to undertake a high level viability appraisal to assess the broad levels of development viability in different housing market areas, which could result in a range of affordable housing percentages being sought across the LPA area.
- 20.1 The first conclusion derived from this Study is that it should be financially viable for market led residential developments to deliver the percentages of affordable housing onsite, as part of the overall mix of dwelling types and tenures as set out in Policy GN 20 Local Needs Affordable Housing. This part of the Study's findings has also informed Policy GN 16 Housing Allocations which sets out the affordable housing requirements for sites identified on the Proposals Map. The Council has also used recent planning decisions in the vicinity of proposed allocations to inform the level of affordable housing required as these decisions provide more location-specific evidence of what is likely to be viable in these parts of the Market Area. The housing market areas represented in Policy GN 20 are identified geographically on the map at Appendix B to the Financial Viability Report.
- 20.2 The Study has also found that, except in the highest market value areas (Band 4), it is no longer realistic to expect new developments of less than 10 dwellings to deliver affordable housing on site. Many smaller developments in this category should, however, be able to make a financial contribution towards off-site delivery of affordable homes, calculated in accordance with the Council's current Affordable Housing SPG (September 2015).⁶⁵ This guidance will require review following adoption of the Local Development Plan 2.

⁶⁴ <https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base> see Financial Viability Report 2024 under 'Housing Viability'

⁶⁵ <https://www.pembrokeshire.gov.uk/adopted-local-development-plan/ldp-supplementary-planning-guidance> Affordable Housing- approved on 14th September 2015 and came into force on 14th September 2015

20.3 The second element to this Study has been an examination of more site-specific viability appraisals undertaken for sites that the Council has decided are “key” to delivery of the LDP-2 strategy. These sites are listed in Appendix F to the Report, together with a summary of the principal details relating to each site and the primary inputs and assumptions used in each appraisal. Although at this stage in the planning process, further site investigation work and other studies remain to be carried out, all these sites are considered to be “viable”; and capable of delivering the proportion of affordable homes and other s.106 obligations that are set out in Appendix F. An explanation of the process that leads to that conclusion is set out in section 6 of the Report.

22.Affordable Housing Thresholds ✓

How were the affordable housing site thresholds defined? Have they been informed by robust, proportionate and credible evidence? ✓

22.1 Chapters 4 and 5 in particular of the Financial Viability Report ⁶⁶ sets out in detail the methodology and approach taken to understand what levels of affordable housing can be achieved on-site. This is affected primarily by location (which Market Area the site is located in) and the size of site proposed (the larger the site the higher the percentage of affordable housing that can be achieved). The high-level assessments also concluded that it is not likely to be viable, in current market conditions, for smaller sites of less than 10 dwellings to make a meaningful contribution to on-site affordable housing; except in the Band 4 market area, where higher sales values could justify the provision of 25% affordable housing on-site for developments of between 6 – 19 new homes. In the 3 other market areas (Bands 1, 2 and 3), it would be better for all sites of less than 10 dwellings – not just those of less than 5 units – to make a financial contribution for the provision of affordable housing off-site (see paragraph 7.3 of the Report).

22.2 Policy 20 Local Needs Affordable Housing sets out the resultant thresholds for onsite/offsite provision.

⁶⁶ <https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base> see Financial Viability Report 2024 under 'Housing Viability'

23. Offsite Contributions (Affordable Housing) ✓

How will off-site contributions be used to deliver affordable housing?

23.1 Off-site-contributions are be used to deliver affordable housing in the manner specified within the existing adopted Affordable Housing SPG⁶⁷ :

23.2 When They Are Used:

- Commuted sums are applied when on-site affordable housing provision is not feasible, such as on smaller sites or when the percentage target results in a fraction of a unit.
- They are also used when off-site contributions are required.

23.1 Calculation:

- The sum is directly linked to the cost a developer would incur for providing affordable housing on-site.
- For a general 10% affordable housing contribution, the commuted sum is £5,087.50 per property.
- The calculation considers the Acceptable Cost Guidance (ACG), land acquisition costs, and the contribution spread across market dwellings.

23.2 Variation by Location:

- The commuted sum varies based on the affordable housing percentage required in different areas. For example, a 5% requirement results in £2,543.75 per property, while a 50% requirement results in £25,437.50 per property.

23.3 Use of Funds:

- The funds are prioritized for affordable housing schemes within the community where they were generated.
- If not used within 3 years, the funds can be allocated to schemes across Pembrokeshire for an additional 2 years.
- If unused after 5 years, the funds are returned to the developer, adjusted for inflation.

23.4 Legal Requirements:

- Developers must submit a signed unilateral undertaking specifying the commuted sum payment before development begins.

23.5 Monitoring:

- The Council employs a Planning Obligations Officer who keeps a register of planning obligations. The Council reports annually in its LDP 1 Annual Monitoring Report on spend.⁶⁸

23.6 These sums ensure that affordable housing needs are met even when on-site provision is not possible.

⁶⁸ <https://www.pembrokeshire.gov.uk/adopted-local-development-plan/implementation-and-monitoring>

24. Gypsy Traveller provision ✓

What is the DP's strategy for the provision of Gypsy and Traveller accommodation? Has it been informed by a Gypsy and Travellers Accommodation Assessment (GTAA)? Does the GTAA identify a need for new pitches (permanent and transit) over the Plan period? How will the need be met? ✓

24.1. There are three policies in PCC's LDP 2, Deposit Plan 2, which refer directly to provision of accommodation for Gypsies, Travellers and Show-people. These are:

- Strategic Policy SP 4 – Gypsy, Traveller and Show-people' Accommodation
- General Policy GN 24 – Gypsy and Traveller Site Allocations
- General Policy GN 25 – Gypsy, Traveller and Show-people's Sites

24.2 A brief discussion of the provisions of each of these policies follows:

- Policy SP 4 is the strategic policy underpinning the detail presented in GN 24 and GN 25.
- Policy GN 24 is the general policy setting out the site allocations for provision of accommodation for gypsies and travellers, these being in three cases extensions to existing Local Authority sites and in a further case a completely new proposal for a Local Authority site. Focussed Changes to LDP 2, Deposit Plan 2 will propose deletion of one of the site extension proposals and modification of another one, with the two further allocations remaining as set out in Deposit Plan 2.
- Policy GN 25 is a criteria-based policy which provides a basis for consideration of proposals for new gypsy, traveller and show-people's accommodation, focusing on proposals coming forward on unallocated sites, which could either be private sites or Local Authority sites.
- The reasoned justification to each policy provides additional information in regard to the provision of accommodation for gypsies, travellers and show-people.

24.3. In addition to the above, there is a LDP 2 Gypsy and Traveller Background Paper (December 2019) and also the Pembrokeshire Gypsy Traveller Accommodation Assessments (GTAAs) from 2015 and 2019. The GTAA 2019 was approved by Welsh Government on 24th May 2024 and LDP 2 seeks to make provisions to meet the need identified by this. It should be noted that this identifies a need for new permanent pitches but not for a transit site.

24.4. Following the consultation on LDP 2, Deposit Plan 2 in autumn 2024, PCC has prepared an issues paper on Gypsy Traveller Need and Provision (Paper A.3.6) which forms a part of Appendix A3 to the report presented on Submission of LDP 2 to Cabinet (2nd June 2025) and Council (17th July 2025). This sets out the issues raised during the consultation, the Council's response and, where appropriate, the Focussed Changes proposed to LDP 2, Deposit Plan 2 to address the matters raised. This Issues Paper can now be found as Appendix 4 to the Consultation Report on the Council's Submission Webpage.⁶⁹ – see Section 4.6 starting page 30.

⁶⁹ [Submission - Pembrokeshire County Council https://www.pembrokeshire.gov.uk/local-development-plan-review/submission](https://www.pembrokeshire.gov.uk/local-development-plan-review/submission)

25. Strategy for Employment ✓

What is the DP's strategy for employment? Has it been informed by an employment land review? Is it consistent with the requirements of national policy? And has it had regard to the key drivers for change in the employment market? ✓

25.1. Policy SP 5 of LDP 2 says that economic forecasts indicate the potential for the Pembrokeshire economy to provide an additional 1,970 jobs between 2017 and 2033. This is based on evidence of projected demand, adjusted to take account of changes since 2018, particularly revised population and household projections and the re-calibration of the annual housing completion figure for the Plan period to 365 dwellings per annum.

25.2. A complication is the recent success of the Celtic Freeport bid and the prospect arising from this that further growth in numbers of jobs created will arise. Clearly, the de-carbonisation of heavy industry along the Milford Haven Waterway, the transformation to hydrogen technology and the emergence of offshore floating wind energy proposals and the associated manufacture of infrastructure is central to this.

25.3. The proposals linked to Celtic Freeport are currently at an early stage in their formulation, but there is a prospect that the additional jobs figure could rise by approximately 1,000 during the Plan period, possibly more. There is also great uncertainty at present regarding the expectations in terms of construction-phase jobs and operational-phase jobs and linked to this whether they will be full-time or part-time roles and whether they will be permanent or fixed contract posts.

25.4. LDP 2 is using a range of policies to plan ahead to meet the future economic needs and aspirations of the County. There are allocations for various B-class use classes included in LDP 2 and the key existing strategic employment sites are safeguarded for future employment use. Key policies of LDP 2, Deposit Plan 2 in an employment, economy, port and energy context are:

- SP 5 – Supporting Prosperity
- SP 13 – Port and Energy Related Development and Celtic Freeport
- SP 14 – Strategic Employment Provision (strategic allocations)
- SP 15 – Safeguarding of existing Strategic Employment Sites
- GN 8 – Employment Proposals
- GN 9 – Employment Allocations (local allocations)

25.5. A Two County Economic Study for Carmarthenshire and Pembrokeshire was prepared in 2019.⁷⁰ This was a joint commission by PCC and Carmarthenshire County Council and also covered the parts of both Counties with National Park designation, hence the involvement of the Pembrokeshire Coast National Park Authority and the Brecon Beacons National Park

⁷⁰ [LDP2 Evidence Base - Pembrokeshire County Council https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base](https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base) - see under Heading 'Economy'

Authority as well. This has helped to inform both the strategic direction for employment, energy and industrial proposals put forward by LDP 2 and also the allocation of strategic sites within the Plan (as set out in policy SP 14 and also through the sites safeguarded through SP 15). It has also informed some aspects of the content of policy SP 13 on Port and Energy Related Development and Celtic Freeport. The 2019 Study was updated in 2021⁷¹, in the aftermath of Brexit and the Covid-19 pandemic. However, the successful conclusion to the Celtic Freeport bid post-dates its publication.

- 25.6. PCC used the Candidate Site evaluation process to review the employment allocations of the earlier Plan, also drawing on the information presented in the Two County Economic Study, including the update.
- 25.7. The policies and proposals presented in the Plan are consistent with Future Wales – the National Plan 2040 (which has a specific policy relating to the Haven Waterway and Energy (policy 32) and designates the Haven Towns and Regional Growth Areas (policy 29)), with Planning Policy Wales and with relevant Technical Advice Notes, including TAN 23 on Economic Development.
- 25.8. Early indications are that in Pembrokeshire, Celtic Freeport will facilitate the use of land already within the operational site areas of existing major industrial sites, particularly those adjoining or otherwise close to the Milford Haven Waterway, although the possibility of new sites or extended sites cannot be discounted at this early stage.
- 25.9. The Plan also supports local employment provision, home working and rural diversification.
- 25.10. The LDP 2 evidence base papers relating to the Economy are as follows:
 - Economic Profile – June 2015 – PACEC consultancy for PCC⁷²
 - Local Employment Trends Background Paper – December 2018 – PCC⁷³
 - Two County Economic Study for Carmarthenshire and Pembrokeshire, Final Report, October 2019 – Arup consultancy for PCC, Carmarthenshire CC, Pembrokeshire Coast National Park Authority and Brecon Beacons National Park Authority (and including Appendix A – Literature Review, Appendix B – Baseline Review, Appendix C – Strategic Sites Review and the Interventions and Strategic Sites Summary Report)⁷⁴
 - Two County Economic Study for Carmarthenshire and Pembrokeshire 2020-21 update, Final Report, January 2021 – Arup consultancy for PCC, Carmarthenshire CC, Pembrokeshire Coast National Park Authority and Brecon Beacons National Park Authority⁷⁵

⁷¹ [LDP2 Evidence Base - Pembrokeshire County Council https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base](https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base) - see under Heading 'Economy'

⁷² [LDP2 Evidence Base - Pembrokeshire County Council https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base](https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base) - see under Heading 'Economy'

⁷³ [LDP2 Evidence Base - Pembrokeshire County Council https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base](https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base) - see under Heading 'Economy'

⁷⁴ [LDP2 Evidence Base - Pembrokeshire County Council https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base](https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base) - see under Heading 'Economy'

⁷⁵ [LDP2 Evidence Base - Pembrokeshire County Council https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base](https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base) - see under Heading 'Economy'

25.11. In addition to the above, PCC carries out Employment Land Surveys periodically. The last completed and published survey was in 2019. A further survey was carried out in 2022, the results of which are currently being processed. The 2019 survey is available to view online and the 2022 survey results will be uploaded once completed.

25.12. The LDP Annual Monitoring Reports also include monitoring information on employment provision generally and on the strategic sites of the current Plan.

Conclusions:

25.13. The Plan presents a clear strategy for employment, drawing on available evidence and setting a realistic job creation target which may increase as the early stages of the Celtic Freeport project are implemented.

25.14. Employment allocations were comprehensively reviewed to take account of the outcomes of the Candidate Site submission and evaluation process, to reflect the Two County Economic Study, including its update and to take account of what is currently known regarding the Celtic Freeport proposals, which link in with emerging de-carbonisation, hydrogen transformation and offshore floating wind proposals, especially in the context of the major industrial sites located adjacent to or near the Milford Haven Waterway.

25.15. It also takes account of employment-related activity at Fishguard Harbour and of local needs for employment sites.

25.16. The proposals are consistent with National Policy, as set out in Future Wales – the National Plan 2040 (particularly policies 29 and 32), with Planning Policy Wales and with relevant Technical Advice Notes including TAN 23.

26. Allocating Employment Land

Does the DP allocate land for new employment development? If so, how has the requirement been defined? Have the allocated sites been subject to a sequential search?

26.1 Yes, LDP2 Deposit 2 does allocate land for new employment development. The Two County Economic Study⁷⁶ for Pembrokeshire and Carmarthenshire has informed the identification of a range of Strategic Employment Sites in Pembrokeshire based around the specific locational assets and sectoral strengths in Pembrokeshire, and specific opportunities linked to existing business growth aspirations. Local employment sites are also identified in the Local Development Plan to support smaller scale local growth.

26.1 The Two County Economic Study for Carmarthenshire and Pembrokeshire, Final Report, October 2019 – Arup consultancy for PCC, Carmarthenshire CC, Pembrokeshire Coast National Park Authority and Brecon Beacons National Park Authority (and including Appendix A – Literature Review, Appendix B – Baseline Review, Appendix C – Strategic Sites Review and the Interventions and Strategic Sites Summary Report)⁷⁷ identified a portfolio of strategic sites within the Plan area which are considered to offer strategic benefits that should be protected, are currently strategic sites with growth potential or have potential to play a role in wider economic development. The approach on the identification and either allocation or safeguarding of strategic industrial sites draws on the conclusions reported in the paragraph 6.3 table of the original report and the detail included in the Appendix C document.

26.2 2020 and 2021 updates to the Two County Economic Study were also prepared, which considers the Covid-19 Pandemic and Brexit, amongst other influences. A continuing need for strategic employment sites across the Plan area was found.

26.3 Following the recent success of the Celtic Freeport bid, a number of Freeport tax sites have been identified (this includes major industrial businesses who applied to be in a tax site for the most part - PCC also put some of its own land forward for this purpose), these being predominantly within the operational areas of existing major industrial sites adjoining or close to the Milford Haven Waterway and / or functionally connected to these sites.⁷⁸

⁷⁶ [LDP2 Evidence Base - Pembrokeshire County Council https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base](https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base) - see under Heading 'Economy'

⁷⁷ [LDP2 Evidence Base - Pembrokeshire County Council https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base](https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base) - see under Heading 'Economy'

⁷⁸ <https://www.celticfreeport.wales/>

- 26.2 The Plan focuses on the opportunities presented through the Swansea Bay City Region Deal, the Haven Waterway Enterprise Zone and the success of the Celtic Freeport bid, as a means of supporting economic prosperity.
- 26.3 The Arup report identifies an ongoing need for a range of employment sites to be provided across the Plan area, through LDP 2, to support the local, regional and national economy.
- 26.4 LDP 2 has taken the classification system of the Arup report and transposed it into policy. The approach was refined following the WG response to LDP 2, Deposit Plan 1, which asked PCC to split what was previously a single strategic allocation policy for employment sites into those that are essentially new sites for allocation and those which are existing sites, where the approach is to safeguard for future employment use. SP 14 (Strategic Employment Provision) allocates strategic employment sites of regional importance at a range of locations. These include sites which are either currently undeveloped or, where development has taken place, a substantial amount of land within the boundary of the site remains undeveloped.
- 26.5 Policy SP 15 (Safeguarding of existing Strategic Employment Sites) will ensure that on the strategic industrial sites, the industrial use of those sites (for instance for port and energy related activities) is retained in the future.
- 26.6 Further sites of local strategic importance and/or to meet local employment needs are allocated in Policy GN 9 (Employment Allocations).
- 26.7 The Candidate Site evaluation process was utilized to review the employment allocations of the earlier Plan, new site submissions, and the information presented in the Two County Economic study. The Candidate Site Assessment Methodology consisted of five phases of assessment.⁷⁹ Candidate Sites were categorized based on the outcome of the assessment.⁸⁰

Criteria colour and number	Criteria summary	Detailed description
Blue 1	Non-Residential Allocation	These sites were deemed to be suitable to be allocated for a specific type of development. This includes Community Facility, Employment, Gypsy & Traveller, Solar Array, Strategic Employment, Specialist and Supported Accommodation.
Blue 2	Transport Safeguarded, Strategy Employment	These sites were deemed to be suitable to be safeguarded for a proposed transport

⁷⁹ [LDP2 Evidence Base - Pembrokeshire County Council https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base](https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base) - see under Heading 'Candidate Site Methodology'

⁸⁰ <https://www.pembrokeshire.gov.uk/local-development-plan-review/candidate-sites>

	Safeguarded or Open Space Designation	scheme, safeguarded due to an existing Employment use or designated to protect an existing Open Space.
Blue 3	A site not allocated for non-residential development (including mixed use with an element of residential) but is within a settlement boundary	These sites were deemed to be suitable for inclusion within a settlement boundary but due to a specific issue it was not considered appropriate to identify it as an Allocation. Criteria based policies can be used to assess these sites for development suitability, which could be a non-residential or potentially a residential use
Blue 4	A Proposal for Transport Safeguarding that has since been completed	A Proposal for Transport Safeguarding that has since been completed.
Pink 1	A non-residential proposal or mixed use including an element of residential, which was considered to be constrained.	Following the initial assessment, the detailed assessment revealed a constraint that deemed the site to be unsuitable for non-residential development. These sites remain outside of a settlement boundary.
Pink 2	A non-residential or mixed-use proposal allocated/safeguarded for an alternative use.	A site that as been allocated/safeguarded for a use not proposed in the candidate site submission.

26.1 In addition to identified new employment sites, a criteria-based policy approach (GN 8 Employment Proposals) provides opportunities for new windfall employment proposals to come forward on unallocated land in or well-related to settlements and in countryside locations where such a location is essential to the enterprise.

26.2 There is an estimate for delivery of jobs in SP5 from the Plan's proposed allocations for employment, which is a forecast that was originally identified based on projected demand figures from Experian Goad, but subsequently adjusted, for instance to take account of revised population and household projections and the consequential reduction of the housing provision figure for the Plan, to which the jobs figure was linked.

27. Protecting Existing Employment Sites ✓

Will the DP provide protection for existing employment sites? If so, what protection will be afforded, and how have the sites been selected?

- 27.1 Yes. SP 15 'Safeguarding of existing Strategic Employment Sites' provides protection for existing employment sites, due to the significance of these sites to the local, regional and national economy. The use of these identified sites for non-employment uses will only be supported where the proposed use is closely related to the main employment use or in exceptional circumstances.
- 27.2 Policy SP 15 recognizes that the employment sites do experience changes in types of and levels of use, and that disused land and building within existing employment sites can make a significant contribution to employment land availability and that their return to use is generally encouraged.
- 27.3 These employment sites have been identified as having influence on the local and regional economy, which therefore demonstrates the necessity of safeguarding said sites to retain a predominance of employment uses in the future.
- 27.4 Existing strategic sites that were considered appropriate for further development were identified within the Two County Economic Study for Carmarthenshire and Pembrokeshire 2019 report⁸¹ and 2021 update⁸². For the strategic sites, it is the information in the table in section 6.3 which provides a foundation for the inclusion of sites in policies SP 14 (for strategic employment allocations) and SP 15 (for safeguarding of existing strategic employment sites). There are some local employment sites allocated by policy GN 9 (simply titled Employment Allocations) and some of these have been taken forward following Candidate Site submissions, rather than through their inclusion in the Two County Economic Study. A robust assessment of the strategic sites can be found in Appendix C of the 2019 report. The identified protected sites are part of the portfolio of existing employment sites in the plan area and have been subjected to the Candidate Site Assessment Methodology⁸³ to establish whether there are any prevailing constraints on site that could hinder further development.

⁸¹ [LDP2 Evidence Base - Pembrokeshire County Council https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base](https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base) - see under Heading 'Economy'

⁸² [LDP2 Evidence Base - Pembrokeshire County Council https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base](https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base) - see under Heading 'Economy'

⁸³ [LDP2 Evidence Base - Pembrokeshire County Council https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base](https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base) - see under Heading 'Candidate Site Methodology'

28. Strategy for Retail Development – ✓

What is the DP's strategy for retail development? Does it take into account the envisaged growth in other sectors, particularly housing and employment, over the Plan period? SH

- 28.1 The strategy for retail development in the Plan supports the national policy approach, set out in Policy 6 of Future Wales⁸⁴ (Town Centre First) and Planning Policy Wales⁸⁵ (paragraph 4.3.18) to encourage new retail and commercial development in the Town Centres. In doing so, it also aims to tackle the issues identified in the South-West Wales Regional Retail Study⁸⁶, prepared in 2017 to inform the Revised Plan strategy and updated in 2019. The Study identified common issues across all of the identified Centres which relate to a general decline in the built environment, rising vacancy rates and traffic congestion, borne, in part, through competition from out-of-town retail developments and changing shopping habits. The Study concluded that there are no significant requirements requiring the identification of development sites. It recommended that no major changes are required for Haverfordwest, but that the focus should be on strengthening the town centre. Pembroke and Pembroke Dock should be considered together and a decision made on where anticipated comparison growth should be located with subsequent review of the primary and secondary shopping frontages for these towns. No specific changes were identified for Fishguard, Milford Haven and Narberth. No changes were identified for retail centres in Pembrokeshire Coast National Park – namely Tenby, Saundersfoot, Newport and St Davids.
- 28.2 The 2017 Study proposes a retail hierarchy for the South-West Wales region. It recognises Haverfordwest as a tier 1 Town Centre, with Pembroke and Pembroke Dock as tier 2 (Primary) Town Centres and Fishguard, Milford Haven and Narberth as tier 3 (Secondary) Town Centres. (See Table 1.2 of the Study). LDP2 strategy response for LDP2 is to maintain a hierarchy of Town and Local Centres which continue to act as hubs of socio-economic activity. Encouraging new retail and commercial development that will maintain or enhance the vibrancy, vitality and attractiveness of these locations and restricting it in other locations is intended to help bring about redevelopment and improvement to the built environment, along with developments intended to improve access by all modes of transport, but prioritising walking, cycling and public transport.
- 28.3 The retail hierarchy is set out in Policy SP 16 *Retail Hierarchy* and is unchanged from LDP1. Policy SP 16 *Retail Hierarchy* requires new retail and commercial development to be consistent in scale and nature with the size and character of each Centre, thereby perpetuating the overall hierarchy into the future. Haverfordwest is the largest

⁸⁴ [Update to Future Wales - The National Plan 2040](#)

⁸⁵ [Planning Policy Wales - Edition 12](#)

⁸⁶ https://www.pembrokeshire.gov.uk/objview.asp?object_id=3255&language=

town, and traditionally the County Town of Pembrokeshire, in the Plan area and is at the top of the hierarchy as a sub-regional Town Centre. The remaining large towns of Pembroke Dock, Pembroke, Milford Haven, Fishguard and Narberth have identified town centres and the settlements of Goodwick, Neyland, Crymych, Letterston, Johnston and Kilgetty are identified as Local Retail Centres.

- 28.4 The 2019 Retail Study identified a need for town centres to adapt and support a wider range of services supporting local communities and wider catchments. Policy GN 31 *Town Centre and Local Retail Centre Development* permits a wide range of uses within the defined Town and Local Retail Centres, which may help town centres to compete with out-of-town retail developments and online shopping and move away from their more traditional roles. The inclusion of Primary Frontage for the largest Centres (Haverfordwest, Fishguard, Milford Haven, Pembroke, Pembroke Dock and Narberth) aims to focus A1 uses to retain a vital retail function for each town, although these frontages have been consolidated to counter increasing vacancy rates and provide a more flexible approach for the wider area. Residential uses are encouraged in principle above ground floor level, further assisting the vitality of the Centres. Two of the Town Centres will also benefit from improvements to public transport hubs, namely Haverfordwest and Milford Haven (see Policy GN 36 *Transport Routes and Improvements*).
- 28.5 The towns and villages identified in the retail hierarchy are dispersed throughout the Plan area. The majority of new housing and employment proposals are directed to the urban locations in LDP2 which will help to revitalise the town centres, both by having greater numbers of people in close proximity and able to use active and public transport to access the town centres. Whilst recognising that shopping habits have changed, this may help to stem the vacancy rate increases, particularly along the primary frontages and improve the vitality of the Centres.

29. Strategy/Policy Framework for various matters ✓

What is the DP's strategy/policy framework for the following areas:

a) Welsh language ✓

29.a.1. At the time of the 2021 Census, overall, 17.2% of the Pembrokeshire population were Welsh speakers (average in Wales 17.8%). Figures for each Town and Community Council area show the figures range from 5.9% to 63.3%. Whilst the Welsh language is spoken throughout Pembrokeshire, the greatest concentration of Welsh language speakers is within north-east Pembrokeshire. A Welsh language-sensitive area has been defined where 18% or more of the population speak Welsh (rounding up of the average figure for Pembrokeshire). The Welsh Language Background Paper⁸⁷ sets out in detail how consideration is given to ensuring that residential allocations within the identified Welsh language-sensitive area contribute to protecting the Welsh language within those communities. There are 13 allocated sites within the Welsh language-sensitive area and detailed comments are provided for each site to demonstrate that the number of houses allocated, affordable housing provision and phasing of delivery supports the use of the Welsh language. Proposals for speculative (windfall) development which is more than minor in scale (5 or more dwellings; floorspace of at least 1,000sqm; site area of more than 1ha) within the Welsh-language-sensitive area will be subject to a Welsh Language Impact Assessment, as set out in Policy SP 19 (Welsh Language). The policy also requires development within the language-sensitive area to be managed to protect the role of the language within the community and to enhance the interests of the Welsh language and culture. This includes careful consideration of location; the potential need for phasing of development to reduce potential for erosion of the language; the potential for the provision of affordable housing; incorporating Welsh language signage and Section 106 contributions to support Welsh language communities.

b) Air quality ✓

29.b.1 LDP 2 seeks to reduce local air pollution through setting out policies and proposals to promote sustainable and active travel modes.

29.b.2 Table 1.11 of the Sustainability Appraisal provides a summary of the Cumulative and In-Combination Effects assessment of strategic and general policies against each sustainability objective. For Objective 11 the following is advised which provides a good summary on the issue of air quality impacts:

'Predominantly positive. Some 'no relationship' and uncertain results are identified. The negative impacts identified under sustainable transport are also reflected here for air quality in conjunction with the same policies because of the use of road transport. See under Sustainable

⁸⁷ [LDP2 Evidence Base - Pembrokeshire County Council](#) see under 'Welsh Language'

Transport above for more information.

Negative impacts associated with housing are also highlighted. In terms of housing providing additional housing will lead to an increase in population and traffic which can have a negative impact on air quality, however, negative impacts will be minimised by locating development in settlements with services which could reduce the need to travel thereby reducing the potential for pollution. Providing accommodation in sustainable locations with active travel and public transport would also help to mitigate negative effects. The appraisal of the spatial strategy supports the approach taken by the Plan in terms of overall sustainable outcomes.

Also town and local centres in sustainable locations will help to minimise any impacts of travel.

Also, with the disposal of waste to land as a last resort this policy is unlikely to meet this SA Objective, although safeguards require that adequate measures are put in place to deal with leachate or landfill gas.'

The Sustainability Appraisal also highlights the need to highlight potential issues in the preparation of site guidance going forward '1.45. *Where development on allocated sites is likely to have adverse impacts, the site allocation policies/supplementary planning guidance of the Local Development Plan would need to include mitigation measures to minimise or obviate those impacts. Many of these refer to the Local Development Plan's development management policies. These include mitigation measures related to:*

.... GN1 (2) Local Amenity: It would not result in a significant detrimental impact on local amenity in terms of visual impact, loss of light or privacy, odours, smoke, fumes, dust, air quality or an increase in noise or vibration levels. ...'

c) Biodiversity and ecological networks ✓

29.c.1. The **Pembrokeshire County Council Local Development Plan 2 (Deposit Plan 2)** places strong emphasis on biodiversity and ecological networks, aligning with both national legislation and local priorities. The Plan is shaped by the Environment (Wales) Act 2016 Section 6⁸⁸ and the Well-being of Future Generations (Wales) Act 2015⁸⁹ and by Planning Policy Wales Edition 12 which require public bodies to maintain and enhance biodiversity and promote ecosystem resilience.

29.c.2. The Plan also integrates biodiversity considerations into **site allocations through the candidate site assessment process** and **design standards** (Policy GN 1 General Development Policy).

29.c.3. Strategic Policy SP 12 – Maintaining and Enhancing the Natural Environment

- This policy sets out the Council's commitment to **protecting and enhancing biodiversity**, geodiversity, and landscape character.
- It supports the **creation, restoration, and connectivity of habitats**, contributing to ecological networks.

⁸⁸ [Environment \(Wales\) Act 2016 https://www.legislation.gov.uk/anaw/2016/3/contents](https://www.legislation.gov.uk/anaw/2016/3/contents)

⁸⁹ [Well-being of Future Generations \(Wales\) Act 2015 https://www.legislation.gov.uk/anaw/2015/2/contents](https://www.legislation.gov.uk/anaw/2015/2/contents)

- Development proposals must demonstrate how they will **avoid, mitigate, or compensate for biodiversity loss**.

29.c.1. **General Policy GN 41 – Protection of National Statutory Environmental Designations**

- Development must not adversely affect **Special Areas of Conservation (SACs)**, **Sites of Special Scientific Interest (SSSIs)**, and other designated sites.
- Proposals near sensitive areas must undergo **Habitats Regulation Assessments** to ensure nutrient neutrality, especially in phosphate-sensitive catchments like the Eastern and Western Cleddau rivers.

29.c.2. **Policy GN 42 and GN 43 – Protection of Local Nature Reserves, Trees, Woodlands, and Hedgerows**

- These policies safeguard **locally important biodiversity features** and promote their integration into development layouts.
- Hedgerows and woodlands are recognized as **key components of ecological networks**.

29.c.3. **Policy GN 45 Green Infrastructure**

- The Plan promotes **green infrastructure** as a tool to enhance biodiversity, improve ecological connectivity, and support climate resilience.
- Developers are encouraged to incorporate **wildlife corridors, native planting, and sustainable drainage systems (SuDS)** that benefit biodiversity.

29.c.4. **Policy GN 47 – Water Quality and Protection of Water Resources:** This policy ensures that development proposals:

- **Do not cause significant adverse effects** on water quality, including surface water, groundwater, and coastal waters.
- **Safeguard watercourses**, wetlands, and other water-related habitats that are important for biodiversity, recreation, and landscape character.
- **Incorporate Sustainable Drainage Systems (SuDS)** to manage surface water runoff effectively.
- **Protect flood plains** and avoid development in areas at risk of flooding unless it can be demonstrated that risks are adequately managed.
- **Encourage efficient use of water resources**, including water conservation measures in design and operation. Please also see response to the Habitats Regulations Assessment  question regarding nutrient neutrality issues and nitrogen in the Pembrokeshire Marine SAC.

d) The historic environment SH

29.d.1. Pembrokeshire has a rich and varied historic environment. One of the Objectives of the Plan is to ensure delivery of high-quality development, supported by sustainable design that responds appropriately to cultural and built heritage, landscape and townscapes. The Sustainability Appraisal included an objective to protect, enhance and value the built heritage and historic environment and concluded that Policies GN 1 *General*

Development, GN 2 *Sustainable Design and Placemaking* and GN 28 *Protection and Enhancement of the Historic Environment* strongly this requirement. Development is required to conserve, protect, preserve or enhance Listed Buildings, Conservation Areas, Registered Historic Parks, Gardens and Landscapes and Scheduled Ancient Monuments and Archaeological Remains.

29.d.2. The historic environment was also taken fully into consideration through the Candidate Site Assessment and sites that raised objection due to potential impact on the historic environment.

e) Minerals ✓

29.E.1. There are five policies in LDP 2 relating to minerals. These are:

- SP18 – Non-Energy Minerals (strategic policy);
- GN 37 – Working of Minerals;
- GN 38 – Safeguarding and Prior Extraction of the Mineral Resource;
- GN 39 – Secondary Aggregates and Recycled Waste Minerals; and
- GN 40 – Buffer Zones around Mineral Sites.

29.E.2. Policy SP 18 is the strategic policy and sets out the Council's position in relation to the contribution towards the national, regional and local needs for a continuous supply of minerals. This will be met by maintaining a reserve of hard rock and sand and gravel throughout and at the end of the Plan period, by safeguarding known resources of aggregates from permanent development in locations outside settlement boundaries, by safeguarding the landfall location for marine-dredged sand and gravel (which is in Pembroke Dockyard), by creating buffer zones around existing mineral production sites to protect quarry operators and those occupying or using nearby land and by supporting the re-use and recycling of minerals. Reference is made in the reasoned justification to SP 18 to:

- Welsh Government's Coal Policy Statement (March 2021);
- Minerals Technical Advice Note 1 on Aggregates; and
- The Regional Technical Statement for Aggregates, 2nd Review, Appendix B, South Wales (September 2020).⁹⁰

29.E.3. A Minerals Background Paper and Addendum have been prepared, along with a Statement of Common Ground on minerals, each of these forming a part of the LDP 2 evidence base.⁹¹ A West Wales Statement of Sub-Regional Collaboration (SSRC) for minerals awaits completion.

29.E.4. Policy GN 37 has two elements. The first element sets out the criteria that need to be satisfied if a proposal for the working of non-energy minerals, for the extension of existing mineral working sites and / or for temporary borrow pits is to be permitted. The second part allocates a site for the future extraction of non-energy minerals, this being a

⁹⁰ [swrawp-wales.gov.uk http://www.swrawp-wales.org.uk/Html/publications.html](http://www.swrawp-wales.org.uk/Html/publications.html)

⁹¹ [LDP2 Evidence Base - Pembrokeshire County Council https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base](https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base) - see under the heading 'Minerals'

proposed extension of the Trefigin Quarry site. While this quarry is currently situated wholly within the Pembrokeshire Coast National Park, this extension proposal would extend the site onto land outside the National Park and thus within PCC's planning jurisdiction. This site has been proposed for allocation following discussions with the National Park Authority. PCC has been in discussions with neighbour Local Planning Authorities (the National Park Authority, Ceredigion County Council and Carmarthenshire County Council) on the preparation of a Statement of Sub-Regional Collaboration for minerals and while this work is not yet complete, the allocation of this extension site will be an important element of proposals for future mineral production in West Wales, in particular in the context of the limited landbank for land-won sand and gravel. It is also noteworthy that there is a long-term expectation that minerals production in National Park locations will eventually cease.

- 29.E.5. Policy GN 38 on safeguarding and prior extraction of the mineral resource has been developed to align with Welsh Government policy and guidance on this matter. The LDP 2 Proposals Map provides the local detail in terms of the spatial distribution of safeguarded minerals. Prior extraction may be needed in certain circumstances. This policy also safeguards the Sand and Gravel Wharf at Pembroke Dock to ensure its ongoing availability for importation of dredged material from the Severn Estuary, as this is an element of the minerals supply to Pembrokeshire.
- 29.E.6. Policy GN 39 sets out a criteria-based approach for the consideration of proposals for the use of secondary aggregates and recycled waste minerals, including the use of construction materials from demolition. There are some local recycled aggregate and secondary aggregate producers in Pembrokeshire, but the scale of such operations is modest.
- 29.E.7. Finally, policy GN 40 relates to buffer zones around mineral sites. It says that new mineral extraction and new sensitive development will not normally be permitted within the defined Buffer Zones around mineral working sites, where such uses would potentially have an adverse impact on one another because of their close proximity.

f) Waste management

- 29.F.1. There are three LDP 2 policies relating to waste:
- SP 21 – Waste Prevention and Management;
 - GN 59 – Waste Management Facilities; and
 - GN 60 – Disposal of Waste on Land
- 29.F.2. Policy SP 21 is the Council's strategic policy on waste prevention and management. It advises that appropriate provision for waste management or disposal facilities will be made within the Plan area. It notes that in the first instance the Plan will seek to prevent the creation of waste. Where this isn't possible, the impact on the environment will be minimised and the use of waste as a resource maximised, through re-use, recycling and other recovery. Only in cases where there is no better alternative will disposal be considered, in that instance by the most sustainable means possible.

- 29.F.3. Reference is made in the reasoned justification to the policy of the European Waste Framework Directive⁹² and Landfill Directive⁹³, as a basis for waste prevention and management across Wales. This is reflected in the Welsh Government's strategy for waste, 'Towards Zero Waste – One Wales, One Planet' (TZW)⁹⁴. This sets out a framework for resource efficiency and waste management in Wales to 2050 and is supported by various Sector Plans, the most significant of which (from a land use planning perspective) is the 'Collections, Infrastructure and Markets Sector Plan'⁹⁵. There is also advice on waste planning in Welsh Government's Planning Policy Wales, edition 12⁹⁶ and in related Technical Advice Note 21 on Waste (TAN 21)⁹⁷.
- 29.F.4. PCC has prepared a Waste Background Paper, which forms a part of the LDP 2 evidence base.⁹⁸
- 29.F.5. Policy GN 59 has two elements. The first of these is to provide a criteria-based approach to the assessment of proposals for the development of new waste management facilities. The second element identifies existing and proposed employment sites that are potentially suitable for the provision of new in-building facilities for the handling and treatment of waste. The reasoned justification to this policy notes that proposals for the handling and treatment of waste will be expected to meet the requirements of policy GN 1 (General Development Policy). Reference is also made to the Annual Waste Planning Monitoring Reports (WPMRs)⁹⁹ that are prepared for the SW Wales region. There is an elaboration on the requirements of TAN 21 and some contextual information about the individual waste streams in a SW Wales context is also provided.
- 29.F.6. Policy GN 60 discusses Disposal of Waste on Land. It is criteria-based and makes reference to the waste hierarchy and for any proposals to dispose of waste on land to be related to an identified national, regional or local need. Reference is also made to measures to deal with any leachate or landfill gas that might arise, to the need to provide a post-operational landform that is compatible with adjoining topography and to

⁹² [Waste Framework Directive - European Commission](https://environment.ec.europa.eu/topics/waste-and-recycling/waste-framework-directive_en)

https://environment.ec.europa.eu/topics/waste-and-recycling/waste-framework-directive_en

⁹³ [Landfill waste - European Commission](https://environment.ec.europa.eu/topics/waste-and-recycling/landfill-waste_en) https://environment.ec.europa.eu/topics/waste-and-recycling/landfill-waste_en

⁹⁴ [towards-zero-waste-our-waste-strategy.pdf](https://www.gov.wales/sites/default/files/publications/2019-05/towards-zero-waste-our-waste-strategy.pdf)

<https://www.gov.wales/sites/default/files/publications/2019-05/towards-zero-waste-our-waste-strategy.pdf>

⁹⁵ [12](https://www.gov.wales/sites/default/files/publications/2019-05/towards-zero-waste-our-waste-strategy.pdf) <https://www.gov.wales/sites/default/files/publications/2019-05/towards-zero-waste-our-waste-strategy.pdf>

⁹⁶ [Planning Policy Wales - Edition 12](https://www.gov.wales/sites/default/files/publications/2024-07/planning-policy-wales-edition-12.pdf) <https://www.gov.wales/sites/default/files/publications/2024-07/planning-policy-wales-edition-12.pdf>

⁹⁷ [tan21-waste.pdf](https://www.gov.wales/sites/default/files/publications/2018-09/tan21-waste.pdf) <https://www.gov.wales/sites/default/files/publications/2018-09/tan21-waste.pdf>

⁹⁸ [LDP2 Evidence Base - Pembrokeshire County Council](https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base) <https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base> - see under the Heading 'Waste'

⁹⁹ WPMRs have been made available to LPAs for their internal use but have not been published by WG. No link provided.

the need for provision to be made for landscaping, progressive restoration, appropriate and beneficial after-use, to restoration and to post-closure site management.

29.F.7. The reasoned justification to the policy mentions the landfill capacity requirements. In Pembrokeshire, the Withyhedge site, near Haverfordwest, is still operational. It was closed temporarily between 15th May 2024 and 6th January 2025, during which a Welsh Government review took place, following complaints relating to landfill gas emissions and related odour issues. The site is regulated by Natural Resources Wales. Other landfill sites in the SW Wales region are now operating at reduced levels or have ceased taking residual waste altogether. Given that the Withyhedge site is still operational and that it is one of the few such sites in the SW Wales region that is, PCC does not see any requirement to make an allocation within its area of jurisdiction.

g) Renewable and low carbon energy ✓

29.G.1. There are three policies in LDP 2 which relate to renewable and low carbon energy, these being:

- GN 4 – Resource Efficiency and Renewable and Low-carbo Energy Proposals;
- GN 5 – Renewable Energy – target and allocations; and
- GN 6 – Development Proposals in Pre-Assessed Areas for Wind Energy (as set out in Future Wales).

29.G.2. There are also strong synergies with two further policies:

- SP 13 – Port and Energy Related Development and Celtic Freeport; and
- GN 7 – Cawdor Barracks including the former Brawdy Airfield.

29.G.3. Policy GN 4 sets out a general requirement that development proposals should seek to minimise resource demand, should improve resource efficiency and should seek power generated from renewable sources, where appropriate. It adds that development proposals are expected to be well-designed in terms of energy use. A further element of the policy says that developments which enable the supply of renewable energy through environmentally acceptable solutions will be supported.

29.G.4. Welsh Government asks Local Planning Authorities to prepare Renewable Energy Assessments (REAs) to inform LDP policies and proposals and PCC has done this through its April 2017 Renewable Energy Assessment¹⁰⁰. A supplementary Background Paper for LDP 2 was prepared in November 2019, which discusses a 1km exclusion zone around the Pembrokeshire Coast National Park boundary for Solar Photovoltaics.¹⁰¹ A further piece of work which supports LDP 2 and forms part of its

¹⁰⁰ [LDP2 Evidence Base - Pembrokeshire County Council](https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base) - <https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base> - see under the heading 'Renewable Energy'

¹⁰¹ [LDP2 Evidence Base - Pembrokeshire County Council](https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base) - <https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base> - see under the heading 'Renewable Energy'

evidence base is the Brawdy Airfield Landscape and Visual Appraisal of Potential Wind Energy Development paper, June 2021.¹⁰²

- 29.G.5. In developing its policies and proposals for LDP 2, PCC has taken into consideration the provisions of Welsh Government's requirements, as set out in Planning Policy Wales, edition 12¹⁰³ and the provisions of Future Wales: The National Plan 2040¹⁰⁴, as well as Renewable Energy Toolkit for Planners¹⁰⁵, which formed a basis for preparation of the 2017 REA.
- 29.G.6. The reasoned justification to policy GN 4 includes a list of different renewable energy technologies. It also references landscape impact, alone and in-combination, which will be a material consideration in the evaluation of renewable energy proposals. However, as noted in paragraph 5.42 of the reasoned justification, one of Welsh Government's pre-assessed areas for wind energy extends into eastern Pembrokeshire and in this case, the likely impacts on landscape have already been modelled and the land area concerned has been found to be capable of accommodating wind energy development in an acceptable way. Reference is also made to potential community benefits arising from renewable energy proposals.
- 29.G.7. Policy GN 5 sets a target for minimum additional renewable energy capacity expected to be developed over the Plan period. This has been set at 9MW per annum, reflecting the scale of recent grants of planning permission for such developments (with a modest uplift applied), although much higher levels of provision have been achieved in the past, when there were grant incentives available. It may be possible to exceed the target in the future, subject to landscape constraints.
- 29.G.8. Policy GN 5 also allocates two sites for Solar Photovoltaic Arrays, at Llanstadwell and Wolfscastle. These are Council-owned sites that have a favourable solar orientation and tilt and are adjacent to sites identified for housing development.
- 29.G.9. Policy GN 6 relates specifically to development proposals in pre-assessed areas for wind energy (as set out in Future Wales¹⁰⁶). One of these (area 8) includes land in eastern Pembrokeshire. The policy says that in this area, local policies and planning decisions should not prejudice the ability for large-scale wind energy developments to come forward. Large-scale energy developments are classed as Developments of National Significance and are determined by the Welsh Ministers. For onshore wind generation, these are schemes of 10MW or more. Future Wales policy 17 sets a presumption in favour of large-scale wind energy development (including re-powering) in pre-assessed areas for wind energy, subject to the provisions of Future Wales policy

¹⁰² [LDP2 Evidence Base - Pembrokeshire County Council](https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base) - <https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base> - see under the heading 'Renewable Energy'

¹⁰³ [Planning Policy Wales - Edition 12](https://www.gov.wales/sites/default/files/publications/2024-07/planning-policy-wales-edition-12.pdf) <https://www.gov.wales/sites/default/files/publications/2024-07/planning-policy-wales-edition-12.pdf>

¹⁰⁴ gov.wales/sites/default/files/publications/2021-02/future-wales-the-national-plan-2040.pdf

¹⁰⁵ [25697 Practice Guidance](#)

¹⁰⁶ gov.wales/sites/default/files/publications/2021-02/future-wales-the-national-plan-2040.pdf

18. Planning Policy Wales edition 12¹⁰⁷, paragraph 5.9.18, advises Local Planning Authorities that they should not seek to amend the Pre-Assessed Areas within their boundaries. However, proposals that come forward as a result of implementation of GN 6 must not create adverse effects on the integrity of Natura 2000 / Ramsar sites, so as to ensure compliance with PPW edition 12 and Technical Advice Note 5 on Nature Conservation and Planning¹⁰⁸.

29.G.10. Policy SP 13 discusses Port and Energy Related Development and Celtic Freeport as a whole. An element of this will relate to renewable energy, but the policy is much broader and covers other types of port and energy-related development as well. There is an important caveat in this policy which says that energy proposals directly related to port locations do not include (terrestrial) wind energy generation.

29.G.11. The reasoned justification to this policy notes that the Haven Waterway is a location for potential new renewable and low carbon-energy development, innovation and investment. It is anticipated that it will support offshore floating wind turbine developments in the Celtic Sea (which potentially might include the manufacture and maintenance / servicing of components of offshore turbines) and provide a basis for energy transformation, including the introduction of hydrogen technology.

29.G.12. Finally, policy GN 7 – Cawdor Barracks including the former Brawdy Airfield – sets out proposals for how this site might be used if its current military use ceases in the future. Reference is made to the possibility of solar photovoltaic arrays on the part of the site ‘outside the wire’ and to small-scale renewable energy proposals ‘within the wire’. Various Focussed Changes are being proposed to GN 7 in response to feedback during the LDP 2, Deposit Plan 2 public consultation.

h) Transport, and

29.H.1. Pembrokeshire is a largely rural County with several towns providing the focus for employment and services. Policy SP 1 sets the strategy of the Plan to create sustainable places. Reducing the need to travel is a fundamental element of the strategy which will help to achieve many of the requirements of this Policy including resource efficiency, protection and enhancement of biodiversity, promotion of health and well-being, accessibility to services and a reduced contribution to climate change.

29.H.2. New development is directed to those locations with the best means of public and active travel through the settlement hierarchy (policies SP6 *Settlement Hierarchy*; SP 8 *Regional Growth Areas and Urban Settlements*; SP 10 *Local Villages* – which includes 24 Cluster Villages which are grouped to achieve services and facilities within relatively accessible locations and have a public transport or active travel link to higher order settlements. Employment allocations are largely within the main towns or in locations with long-standing industries largely linked to the sea and with good landward transportation routes, including railways.

¹⁰⁷ [Planning Policy Wales - Edition 12](https://www.gov.wales/sites/default/files/publications/2024-07/planning-policy-wales-edition-12.pdf) <https://www.gov.wales/sites/default/files/publications/2024-07/planning-policy-wales-edition-12.pdf>

¹⁰⁸ [tan5-nature-conservation.pdf](https://www.gov.wales/sites/default/files/publications/2018-09/tan5-nature-conservation.pdf) <https://www.gov.wales/sites/default/files/publications/2018-09/tan5-nature-conservation.pdf>

- 29.H.3. Policy SP 20 *Transport Infrastructure and Accessibility* allows for improvements to the existing transport infrastructure that will increase accessibility to employment, services and facilities particularly by sustainable means, including pedestrian and cycleway schemes.
- 29.H.4. Policy GN 1 *General Development Policy* sets out the general requirements for all development and includes the need for it to be in accessible locations and incorporate sustainable transport and accessibility principles. Due to the dispersed nature of the smaller settlements throughout the Plan area it is acknowledged that the car will also continue to play an important role. Policy GN 2 *Sustainable Design and Placemaking* relates to sustainable design and place-making and requires development to make provision for ultra-low emission charging-points on residential and commercial developments. Policy GN 3 *Infrastructure and New Development* will seek planning contributions for a range of purposes, including sustainable transport facilities.
- 29.H.5. Policy GN 29 *Community Facilities* allows for the development of new facilities which are well located for the community they are intended to serve and are accessible by public transport, walking and cycling.
- 29.H.6. Tourism is an important element of the local economy which is recognised in Policy SP 17 (Visitor Economy). The strategic policy recognises a need to balance the economic benefits with ensuring that the resident communities and the wider environment are protected. Most visitors to Pembrokeshire arrive by and travel around the County by car. It is important that development intended to serve this sector does not undermine the positive sustainability requirements in place for other types of development, including residential and employment uses. Policies GN 55 (Serviced and Hotel Accommodation); GN 56 (Caravan, Camping and Chalet Development); and GN 58 (Self-Catering Accommodation) direct new development to the settlements appropriate for their scale. Only small-scale developments or those with a clear link to specific locations are permitted in the countryside.

i) Planning obligations ✓

- 29.I.1. Planning obligations will be used to secure site-specific requirements (see Policy GN 3 Infrastructure and New Development). A Planning Obligations SPG will also be developed post adoption to provide additional clarity in this respect. A link to the existing Planning Obligations for Local Development Plan 1 can be found in the footnote.¹⁰⁹

¹⁰⁹ [LDP Supplementary Planning Guidance - Pembrokeshire County Council](https://www.pembrokeshire.gov.uk/adopted-local-development-plan/ldp-supplementary-planning-guidance)
<https://www.pembrokeshire.gov.uk/adopted-local-development-plan/ldp-supplementary-planning-guidance> Planning Obligations September 2015

30. Monitoring Framework ✓

Does the DP provide a monitoring framework that will enable the LPA to track the implementation of the strategy and policies on an annual basis and, if necessary, trigger a review?

30.1. The plan will be monitored and contains a clear monitoring framework in Appendix 4 to the Local Development Plan 2 Deposit 2, which sets out how the Plan's Strategy, Objectives, Policies and Proposals will be monitored against appropriate indicators and trigger points for action (linked to plan review/revision).