



Pembrokeshire County Council  
Local Development Plan 2  
2017-2033

## Deposit 2 Plan

Re-Draft 1: September 2024 with Focussed Changes

Re-Draft 2: March 2026 with Matters Arising Changes

**CE** = Consequential Edits

## Foreword

In early 2020, Cllr. Jon Harvey prepared a Foreword for the first Pembrokeshire County Council Local Development Plan 2 Deposit Plan. This plan covers the period, 2017 to 2033 and will, once adopted, replace the current Local Development Plan, which was adopted in 2013. Cllr. Harvey explained that the Local Development Plan (LDP) is a critical document, as it sets out the development framework which is used to determine planning applications and to guide the use of land for the area of Pembrokeshire outside the Pembrokeshire Coast National Park. That remains the case.

At that time, PCC held extensive consultation events with communities, councillors and stakeholders, at which there was discussion about the issues facing Pembrokeshire now and in the future, providing officers and Members with a range of views on how we could tackle those issues.

The consultation on Deposit Plan 1 ran until the 18<sup>th</sup> March 2020 and immediately after the consultation closed, the Covid-19 lockdown commenced, continuing intermittently for some considerable time and putting further progress with the LDP review on hold. Nonetheless, in October 2020 a new Delivery Agreement for LDP 2 was agreed by Welsh Government and a Covid Impact Assessment for the new Plan was published.

Early in 2021, a further major challenge arose, when NRW prepared new guidance on phosphate pollution in the non-tidal parts of Special Areas of Conservation rivers in Wales. In Pembrokeshire, the Eastern and Western Cleddau river catchments and those parts of the Teifi catchment in the County were found to a significant extent to be failing in that regard. Clearly, this was a major concern, as the conservation features for which those river catchments are designated were at significant risk of loss due to eutrophication. This issue affected more than 40% of the Council's area of planning jurisdiction and in many cases it seemed likely that allocations in the 2020 Deposit Plan within the affected areas would be unable to be carried forward into the new Plan due to uncertainties over deliverability relating to a need to demonstrate nutrient neutrality and satisfy the requirements of Habitats Regulation Assessments. While issues around river water quality, including phosphate pollution, remain, ways are now being found to allow much needed new development to go ahead in affected areas.

In December 2021, a report was approved by Council proposing the preparation of a further revised Delivery Agreement for the Plan (approved by Welsh Government in June 2023 and a fourth iteration approved by Council and the Welsh Government in July 2024) and a repeat of the Deposit-stage public consultation, but based on a revised Plan, taking account of all that had happened since early 2020. This is the revised Plan and it will, like its predecessor, be subject to full public consultation, prior to it being moved forward to the later stages of the Plan process – submission to Welsh Government, independent Examination by an Inspector from Planning and Environment Decisions Wales (PEDW – formerly the Planning Inspectorate in Wales) and ultimately adoption following receipt of the Inspector's Report.

As well as the above mentioned issues, since early 2020 the Welsh Government has published Future Wales – the National Plan 2040, there have been new editions of Planning Policy Wales and the Development Plans Manual published, the Swansea Bay City Deal has moved forward in terms of implementation and, most recently, the

joint Pembrokeshire / Neath-Port Talbot Celtic Freeport bid has been successful. Each of these is highly significant in terms of what LDP 2 should be saying and how it is formulated and delivered. There were also a large number of responses submitted to the first Deposit LDP 2 in 2020 – and while we are not taking that version of LDP 2 forward to the later stages of the Plan process, the comments received have been taken into consideration in preparing Deposit Plan 2.

The success of the Celtic Freeport bid in particular is a matter of huge importance to Pembrokeshire, with a long delivery period anticipated (to 2050) and the potential to create 16,000 new jobs across Pembrokeshire and Neath-Port Talbot and to generate millions of pounds of new investment. A start will be made on that during the LDP 2 Plan period, but at present details of both sites and proposals are at an early stage, making it difficult for LDP 2 to respond fully to what might be needed. Hence, that will, in part, need to be picked up by successor Plans – the regional SW Wales Strategic Development Plan and subsequent LDPs.

The Foreword to the 2020 Deposit Plan said that Pembrokeshire County Council had given careful consideration to how much development Pembrokeshire needs, to support both communities and business growth, during the period to 2033. That requirement remains and has been brought up-to-date for this subsequent version of the Deposit Plan. Clearly, there is also a need to protect the special qualities of Pembrokeshire, in particular its landscape, habitats, species and open spaces, both in recognition of their own very special value and because it underpins many aspects of economic and social life in Pembrokeshire. The duties placed on Pembrokeshire County Council, as a Local Authority, under the Well Being of Future Generations Act 2015 and the Environment Act 2016, require us to improve the social, economic, environmental and cultural well-being of Pembrokeshire and to enhance biodiversity. This has shaped the way in which the review of the LDP has been undertaken and the outcomes that we are anticipating. That approach is carried through into the LDP 2, Deposit Plan 2 document. What has happened since early 2020 has reinforced the need to try to reflect what Pembrokeshire needs in terms of its environment, its places and its communities in LDP 2.

It is my wish, one shared with fellow Councillors, to make sure that in 2033 Pembrokeshire is a sustainable place, where communities are supported with new homes, jobs, community facilities and infrastructure. We also want to protect and safeguard the area's environment and provide green spaces to help people live healthy lives. The challenges faced and opportunities that have emerged since early 2020 have made that more challenging to deliver, but the replacement Local Development Plan will nevertheless play a key role in achieving this.



**Cllr. Jacob Williams, Cabinet [lead Member](#) for Planning and Regulatory Services, Pembrokeshire County Council**

**September 2024**

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## Glossary

<a href="#">Accessible locations</a>	<a href="#">Ones which can be easily reached by a variety of different travel modes, including walking, cycling and public transport.</a>
Active travel	Active travel refers to modes of travel that involve a level of activity. The term is often used interchangeably with walking and cycling, but active travel can also include trips made by wheelchair, mobility scooters, adapted cycles, e-cycles, scooters, as well as cycle sharing schemes
Adopted	The Local Development Plan is adopted when the Authority's Council Meeting decides it will be the Development Plan for the County and replace the existing Development Plan.
Affordable Housing	<a href="#">Housing provided to those whose needs are not met by the open market. Affordable housing should:</a> <ul style="list-style-type: none"> <li>• <a href="#">meet the needs of eligible households, including availability at low enough cost for them to afford, determined with regard to local incomes and local house prices; and</a></li> <li>• <a href="#">include provision for the home to remain affordable for future eligible households*, or if a home ceases to be affordable or staircasing to full ownership takes place, any subsidy should generally be recycled to provide replacement affordable housing. This breaks down into two sub-categories:</a> <ul style="list-style-type: none"> <li>• <a href="#">social rented housing - provided by local authorities and registered social landlords where rent levels have regard to the Welsh Government's guideline rents and benchmark rents; and</a></li> <li>• <a href="#">intermediate housing - where prices or rents are above those of social rented housing but below market housing prices or rents. This can include equity sharing schemes (for example shared ownership). Intermediate housing differs from low cost market housing, which the Welsh Government does not consider to be affordable housing for the purpose of the land use planning system.</a></li> </ul> </li> </ul> <p><a href="#">* The affordable housing provided on exception sites should meet the needs of local people in perpetuity and count towards the overall level of housing provision. Residential development for sale or rent below market prices and retained as affordable in perpetuity</a></p>
Affordable Housing Allocation	Land allocated for affordable housing either low-cost home ownership or to rent.
Amenity Open Space	Private or public land which has value due to its characteristics and contribution to a sense of place or community well-being through -

	<ul style="list-style-type: none"> <li>• Reinforcing or introducing spatial character or setting for the wider rural and urban landscape, or</li> <li>• Making an important contribution to Green Infrastructure networks or biodiversity, or</li> <li>• Providing a place for relaxation, informal recreation or exercise, or</li> <li>• Its character contributes to the quality of life of communities or</li> <li>• Provides for the conservation of assets of importance, including historic assets, biodiversity or community assets.</li> </ul> <p>Amenity open space is not necessarily open to public access.</p>
Annual Monitoring Report (AMR)	An annual report to assess the extent to which policies in the adopted LDP are being successfully implemented.
Availability and Deliverability of Land	Available land includes a landowner willing to develop or sell for development. Deliverability relates to the economic viability of bringing a site forward
Countryside	Land outside of settlements identified within the Settlement Hierarchy
Deposit Plan	A full draft of the Plan which is available for public consultation during the Deposit Period.
Directly Related	Immediately adjacent to a defined Settlement Boundary identified in the Settlement Hierarchy.
Green Infrastructure	A network of natural and semi-natural areas and features that contribute to the high quality of the environment. This can include cycleways and footpaths, parks, fields, allotments, cemeteries and gardens, and can comprise entire ecosystems such as wetlands, waterways, rivers, lakes and mountains.
Gypsy and Traveller Pitch	Each pitch will include an amenity block, a mobile home, a touring caravan and parking space for 2 vehicles (Welsh Government Designing Gypsy and Traveller Sites, May 2015)
<a href="#">Highly accessible locations</a>	<a href="#">Ones which satisfy the requirements to be considered as accessible and where the public transport element is regular during the day (once an hour or better) and available on at least 6 days a week (excepting on Bank Holiday weeks).</a>
Housing Allocation	Residential development sites for a minimum of 5 units and shown within the Development Plan
Infrastructure	Infrastructure encompasses power supplies, water supply, means of sewage or surface water disposal, roads and other transportation networks, telecommunications and facilities that are required as a framework for development.
Infill and rounding off	Settlements identified within the Settlement Hierarchy (Policy SP6) have Settlement Boundaries which provide clarity on where opportunities for infill and rounding off for housing purposes may be suitable and where new employment, community and other facilities may come forward.

Landscape Character Assessment	A landscape character assessment identifies and describes the distinct, recognisable and consistent pattern of elements in the landscape that makes one landscape different from another, rather than better or worse. The Landscape Character Assessment for Pembrokeshire, outside the Pembrokeshire Coast National Park, identifies 29 Landscape Character Areas. This is being taken forward as Supplementary Planning Guidance to the current LDP (2013), with a draft being subject to public consultation between 22 <sup>nd</sup> February 2023 and 26 <sup>th</sup> May 2023. It is anticipated that it will be adopted in 2024 and rolled forward as SPG to LDP 2 once the latter plan is adopted.
Lifetime Homes Standard	The Lifetime Homes Standards is a series of sixteen design criteria intended to make homes more easily adaptable for lifetime use at minimal cost. The concept was initially developed in 1991 by the Joseph Rowntree Foundation and Hainteg Housing Association.
Major Development	<p>The Town and Country (Development Management Procedure (Wales) Order 2012, Article 2, defines major development as follows:</p> <p>Major development (“<i>datblygiad mawr</i>”) means development involving any one or more of the following:</p> <ul style="list-style-type: none"> <li>• The winning and working of minerals or the use of land for mineral-working deposits;</li> <li>• Waste development;</li> <li>• The provision of dwellinghouses where: <ul style="list-style-type: none"> <li>a) The number of dwellinghouses to be provided is 10 or more; or</li> <li>b) The development is to be carried out on a site having an area of 0.5 hectares or more and it is not known whether the development falls within sub-paragraph (c)(i);</li> </ul> </li> <li>• The provision of a building or buildings where the floor space to be created by the development is 1,000 square metres or more; or development carried out on a site having an area of 1 hectare or more.</li> </ul> <p>References to major development in the context of LDP 2 policies GN 3 and GN 27 covering matters relating to broadband and telecommunications only relate to major developments in the residential and employment categories.</p>
Market Housing	Housing for sale at market prices (can include self-build or custom build housing).
Net benefit for Biodiversity	A net benefit for biodiversity is the concept that development should leave biodiversity and the resilience of ecosystems in a better state than before, through securing long-term, measurable and demonstrable benefit, primarily on or immediately adjacent to the site.
‘Planning by Appeal’	Ad hoc development proposals which come forward in the absence of a development strategy to guide development

Preferred Option	The single option or hybrid option resulting from the consideration of a range of options or issues following consultation.
Preferred Strategy	The first formal strategy document for the review of the LDP which sets out the framework and overarching policies that will guide the policies and proposals relating to land use.
Review Report	Sets out what in the LDP needs to change and why.
Rural Enterprise Dwelling	A new residential development in the open countryside, justified by robust supporting evidence when accommodation is required to enable rural enterprise workers to live at, or close to, their place of work.
Satellite Settlement	A small hamlet or group of dwellings which is physically separate from a main settlement, but has a strong functional link to that settlement.
Settlement Boundary	A settlement boundary is a planning tool which involves a theoretical line drawn on a map to identify the boundary to a settlement. Typically housing development is only permitted within this boundary and areas outside it are considered to be countryside.
Settlement Hierarchy	Settlements are classified within the hierarchy according to the population and level of services within the settlement. Some very small settlements with very limited or no services will fall outside the hierarchy and are defined as countryside.
Self build/custom build housing	Bespoke housing development commissioned and managed by the intended occupier. In all cases whether a home is self-build or custom build, the initial owner of the home will have primary input into its final design and layout.
Specialist and Supported Accommodation	New build or adapted accommodation which meets the care and support needs of older people, people with learning disabilities, mental ill-health, younger people or people recognised as vulnerable including the homeless and domestic abuse victims.
Well-related	Well-related means well-related to the built form of a settlement in terms of proximity, physical and sustainable connectivity and visual relationship.
Windfall Development	Windfall developments are unanticipated developments, not allocated within the Local Development Plan, which are normally defined as 5 or more residential dwellings, or development over 1,000 sq. metres

## Executive Summary

### Strategy

The Local Development Plan identifies the key issues currently facing Pembrokeshire and a Vision and Strategic Objectives aimed at addressing these issues.

The Local Development Plan identifies a need for **5,840 new homes** between 2017 and 2033 (365 a year). A flexibility allowance of 10% is proposed in line with the typical approach across Wales.

This growth will be distributed across the Plan area in accordance with a spatial strategy, which promotes sustainable development. As part of this, a **Settlement Hierarchy** groups settlements into different categories, depending on the levels of services and facilities located within them. A weighting system has been applied which gives greatest weight to those facilities identified as being likely to reduce the need to travel and therefore most likely to contribute to a sustainable location. The greatest levels of growth (housing sites of 5 or more) will be located in settlements which are at a Service Village level or higher within the Settlement Hierarchy.

A **60% / 40% Urban / Rural** split of housing allocations (sites over 5 units) is proposed. This is broadly in line with the current population split in Pembrokeshire. This approach offers growth opportunities to both urban and rural communities.

Within the settlements identified within the Settlement Hierarchy, Settlement Boundaries will identify locations considered appropriate for development (including both market and local needs affordable housing).

The strategy of the Local Development Plan is to provide opportunities for growth across the Plan area in rural as well as urban settlements. This strategy should enable the growth of rural **Welsh speaking communities**. The issues related to phosphate pollution in the Cleddau and Teifi river catchments has made that somewhat more challenging to achieve than was previously the case, but it is nonetheless still felt to be achievable. Assessment of Candidate Sites in areas with a high proportion of Welsh language speakers has aimed to ensure that sites of an appropriate scale are supported. A strategic policy on the Welsh Language offers the potential to introduce phasing requirement on sites which are considered large in relation to existing communities. This means that sites will be released more slowly into the housing market and heightens the chance of such properties being bought by existing community members who speak Welsh. All of the Plan's policies and allocations have been assessed in relation to their potential impacts on the Welsh language through the Sustainability Appraisal of the Plan.

### Housing

Extensive **viability testing** has taken place on proposals for Housing sites, based on a best-practice regional model. Stakeholder workshops with local agents and developers, supplemented by individual meetings has assisted in providing local information on build costs and finance, which have informed the identification of **site specific targets** for Affordable Housing. As well as requirements to deliver affordable housing on market sites, a number of 100% affordable housing sites have

been identified as allocations, where the Council has clear evidence of deliverability through its own Council house building programme, or by Registered Social Landlords.

**A Development Sites and Infrastructure Supplementary Planning Guidance** document accompanies the Plan and sets out the infrastructure that Allocated sites will be expected to deliver in line with the Plan's policy requirements. This document also identifies constraints affecting individual allocated sites.

The Local Development Plan proposes the introduction of **space standards** in line with the English Prescribed National Space Standards to support well-being objectives and provide sufficient space for modern recycling requirements.

The Local Development Plan also proposes specific allocations for Specialist and Supported accommodation, supported by evidence of need from Social Care research. In addition to this, a requirement for large housing sites to provide a proportion of dwellings built to **Lifetime Homes standards** is established to support the Council's wider 'prevent' agenda and ensure that Pembrokeshire has sufficient housing stock to meet the requirements of an ageing population, which is likely to have increased mobility issues, as well as to meet the needs of other groups who require specialist and supported accommodation.

### **Economy**

A Two County Economic Study 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 businesses growth aspirations. Local employment sites are also identified in the Local Development Plan to support smaller scale local growth. Looking ahead, transformation of the major industrial sites around the Haven Waterway to low or zero carbon alternatives is anticipated.

A 2020 and 2021 update to the Two County Economic Study for Pembrokeshire and Carmarthenshire has also been prepared, taking into consideration the Covid-19 pandemic and Brexit, amongst other things. A continuing need for strategic employment sites in the Plan area was found. Although pre-dating the successful Celtic Freeport bid, the conclusions of the original Study and the update continue to be highly relevant to the future of Pembrokeshire.

Tourism and general economic policies have been drafted to provide flexibility over the Plan period. Detailed evidence on landscape capacity for Caravans and Chalets has been prepared, which alongside sustainability criteria has informed the tourism policy approach on these topics.

Specific policies on minerals, waste, telecommunications (including broadband) and transportation are also presented in the Local Development Plan.

## Environment and Climate Change

In light of the requirements of the Well Being of Future Generations Act 2015 and Environment Act 2016 the Local Development Plan includes a specific strategic policy focusing on opportunities to enhance as well as maintain the Environment. The Local Development Plan contains policies and designations to protect identified open space, and Green Wedges. It also recognises the importance of Green Infrastructure. A policy has also been prepared on river water quality, reflecting the heightened awareness of river pollution issues following publication of the Natural Resources Wales phosphates guidance for non-tidal SAC rivers in Wales.

The Local Development Plan will mitigate and respond to the challenge of **Climate Change** in a number of ways:

- A.** 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.
- B.** 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. Areas of existing settlements that have areas at high risk of flooding from sea-level rise are identified by the Coastal Change policy. Infill proposals for residential development or changes of use to residential development / extensions will not be permitted in the Coastal Change areas
- C.** All new dwellings will be required to achieve high design standards incorporating **energy efficient design**.
- D.** The Local Development Plan includes a specific policy requirement for all new dwellings to include the provision for **Ultra Low Emission Vehicles** charging.
- E.** The Local Development Plan identifies a number of specific allocations for **solar arrays**.
- F.** The Local Development Plan designates and protects sites and species of importance from a **biodiversity** and nature conservation viewpoint.
- G.** The Plan is sufficiently flexible to allow the transformation of existing industrial sites to lower carbon or zero carbon alternatives in the years ahead.



## Introduction

### Pembrokeshire County Council Local Development Plan 2017-2033

- The population of Pembrokeshire is forecast to grow over the next 16 years, and there will be a need for new homes, jobs, leisure, community facilities and infrastructure to support this growth. It is important that growth is properly planned to ensure that it benefits the community, delivers sustainable development and facilitates a transition to lower carbon or zero carbon technologies. Key areas of Pembrokeshire also need to be protected from development to safeguard the area's environment, protect against and adapt to climate change and provide green spaces and infrastructure to encourage healthy lifestyles.
- National legislation and planning guidance requires local authorities in Wales to prepare and maintain a **development plan** that deals with the land use aspects of the challenges above, and does so in line with the sustainable development duty embodied by the Well Being of Future Generations Act (2015). Pembrokeshire County Council has responsibility for producing a Development Plan for its planning area, which excludes the Pembrokeshire Coast National Park Authority. Unless otherwise stated, elsewhere in this document **Pembrokeshire** refers to the Pembrokeshire County Council planning area.
- This replacement LDP (**LDP 2**) will provide a framework for development in Pembrokeshire (excluding the National Park) for the period from adoption up until 1<sup>st</sup> April 2033.

### What is the Local Development Plan?

- The Plan includes the long term vision for Pembrokeshire and the objectives and land use policies needed to deliver that vision. It includes a key diagram, strategic and general policies and allocations (sites for development and restraint). The Plan also includes a Proposals Map illustrating each of the Plan's policies and proposals with a spatial component. Details of all stages of Local Development Plan preparation can be found in the Authority's further revised Delivery Agreement (June 2023). The Local Development Plan has been developed incorporating information from the following sources:
  - National legislation, policy and guidance;
  - Local and Regional strategies and designations (including the Swansea Bay City Region Deal and the Pembrokeshire Enterprise Zone);
  - Information from Annual Monitoring Reports demonstrating how the current LDP 1 is performing;
  - A review of the evidence base relating to key issues and any contextual updates.<sup>1</sup>;
  - Consultation with Key Stakeholders (including Town and Community Councils and Members) and Community Engagement;

<sup>1</sup> <https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base>

The Plan should be seen and read as a whole. Often there will be more than one policy relevant to a proposed development, and all policies will be taken into consideration.

### Supplementary Documents

- The Preferred Strategy has been subject to a **Sustainability Appraisal (SA)** and **Strategic Environmental Assessment (SEA)**<sup>2</sup> to assess whether the LDP will have any significant impacts upon the environment (positive or negative), socio-economic impacts and ascertain whether it will help to deliver sustainable development. It has also been subject to a **Habitats Regulations Assessment (HRA)**<sup>3</sup>, an **Equalities Impact Assessment (EIA)**<sup>4</sup>. The **SA** and **SEA** incorporate a **Health Impact Assessment (HIA)**.
- Other Strategic Assessments and Topic Papers also provide supporting information and a rationale for the Local Development Plan. These focus in more detail on some of the Key Issues that are of particular significance for the County and therefore the LDP. They are available on the Council's website.<sup>5</sup>.

### Candidate Sites

- Developers, agents and organisations submitted sites for inclusion in the LDP. These were assessed as to their suitability for development using the Candidate Site Assessment Methodology Background Paper. The Site Assessment Report 2024, published as part of the Council's evidence base, provides details of the assessment undertaken for each Candidate Site. Since the First Deposit Plan was published in 2020, a limited further opportunity to provide Candidate Sites has been provided. The three sites submitted have been added to the Candidate Site Register and have been assessed on a basis that is consistent with that used for the earlier submissions.

### Tests of Soundness

- In order to be adopted, a Local Development Plan must be determined 'sound' by the examination Inspector (S64 of the 2004 Act). Tests of soundness are identified in Planning Policy Wales, and the Local Development Plan Manual Edition 3 March 2020 (ch6).

### Engagement

- The Local Development Plan 2 has been developed since 2017 when the Authority's Review Report and Delivery Agreement were completed. Land use planning has been fully integrated with wider holistic considerations (such as

<sup>2</sup> <https://www.pembrokeshire.gov.uk/local-development-plan-review/strategic-environmental-assessment-ldp2>

<sup>3</sup> <https://www.pembrokeshire.gov.uk/local-development-plan-review/habitats-regulation-appraisal>

<sup>4</sup> <https://www.pembrokeshire.gov.uk/local-development-plan-review/equality-impact-assessment->

<sup>5</sup> <https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base>

infrastructure requirements and sustainable management of *natural resources*) through collaboration with relevant stakeholders on all topic areas. There has been comprehensive engagement at each stage of the Plan's preparation in line with the *Community Involvement Scheme (CIS)* set out in the further revised Delivery Agreement for LDP 2, ensuring consensus building and transparency.

### **Reading the Plan**

- The Local Development Plan includes the text and the Proposals Map (including Inset Maps for individual settlements). The Plan must be read as a whole. In the case of any disparity between the text and the maps, the text takes precedence. A Constraints Map has also been produced to support LDP 2, providing information on general constraints across the Plan area. This is available alongside the Proposals Maps, but is not a formal part of the Local Development Plan.

## 1. CONTEXT AND KEY ISSUES

### Overview

- 1.1 Pembrokeshire is a predominantly rural County, with a strong maritime influence and has a history of development based on agriculture, tourism, defence, energy, and port activities centred on the Milford Haven Waterway. The area is characterised by a series of distinct, yet interdependent settlements. The unique environment and strong sense of community is attractive to both residents and visitors and provides a distinctive sense of place. The Pembrokeshire ports – Fishguard and the Milford Haven Waterway are international assets, critical to the future energy security of the UK and in providing connectivity to and from the Irish Republic. Transition of the major industrial sites along the Haven Waterway to a lower or zero carbon future, adaptation to climate change and developing green infrastructure are emerging themes. There are also plans to bring forward offshore floating wind turbines in the Celtic Sea, the development of which will require onshore infrastructure and manufacturing capabilities.
- 1.2 The LDP must strike the right balance between protecting those elements that make Pembrokeshire special, whilst at the same time helping to facilitate new opportunities for growth and prosperity for businesses and communities across the Plan area. The challenge of striking the right balance in relation to the emerging Celtic Freeport proposals in the Milford Haven Waterway and the need to protect the Special Area of Conservation relating to the same body of water is a significant one requiring great care.
- 1.3 The Local Development Plan is based on a sound understanding of the regional and local context, and the key issues facing the County. The Local Development Plan has been developed from an extensive evidence base and in conjunction with a range of Stakeholders through informal and formal public consultations.
- 1.4 The context and issues set out in this Chapter have informed the LDP Vision and Objectives presented in Chapter 2.

### Key Characteristics

- 1.5 The key characteristics and spatial land uses of the Plan area are summarised below:
- Pembrokeshire is a largely rural area.<sup>6</sup> Its population density, at 77 people per square kilometre, is the fifth lowest in Wales.
  - Towns around the Milford Haven Waterway (Pembroke, Pembroke Dock, Milford Haven and Neyland), Haverfordwest (the County Town), Fishguard and Goodwick and Narberth contain concentrations of population and employment. The existing population distribution is split between 56% living in the Urban Settlements and 44% living in the area defined as rural<sup>7</sup>.

<sup>6</sup> See figure 3.1 Pembrokeshire Economic Profile (PACEC) LDP 2 Evidence Base

<sup>7</sup> Population estimate derived from 2021 Census data

- Employment continues to be focused on the tourism and service industry, transport, manufacturing, construction, public health, port and energy related developments, public services and agriculture.<sup>8</sup>
- The Haven Waterway is of national significance for port, industry and energy sectors. It is also designated for its landscape and biodiversity value. It has recently been subject to the successful Celtic Freeport bid, shared with Neath-Port Talbot.
- Much of the coast is within the Pembrokeshire Coast National Park (along with the area around the Daugleddau and the Preseli Hills).
- Marine and terrestrial Special Areas of Conservation (SACs) Special Protection Areas (SPAs), Sites of Special Scientific Interest (SSSIs), the Skomer Marine Conservation Zone (MCZ), National and Local Nature Reserves are designated.
- The County has a high number of heritage assets. The Plan area has 1,649 listed buildings and 248 Scheduled Monuments. There are currently 20 Historic Parks and Gardens, two Historic Landscapes, 24 Conservation Areas - with a Townscape Heritage Initiative in Haverfordwest, two country parks, 42 village greens and 57 sq kms of Common Land (including those Commons within the area of Pembrokeshire Coast National Park), which in combination have produced an area with special natural characteristics and a distinctive cultural heritage.
- Rivers such as the Western Cleddau (for instance in Haverfordwest), the Ritec and the lower Teifi are prone to flooding, as are many coastal areas of Pembrokeshire. The Riverine SACs of the Eastern and Western Cleddau and the Teifi are known to have high levels of phosphates and in 2021 NRW published new guidance in connection with this to protect the special features for which these river catchments have been designated. Concentrations of Nitrates in the Haven Waterway in Pembrokeshire is also a concern ~~and there are proposals to widen Nitrate Vulnerable Zones in Wales. In a pan-Wales context, in April 2021 the designated Nitrate Vulnerable Zones in Wales were revoked by the introduction of the Water Resources (Control of Agricultural Pollution) (Wales) Regulations, with some measures transitioning into law over a period of time, but the transition periods not applying to those farms located in previously designated NVZs, where all the measures in the above mentioned Regulations apply immediately.~~ It is also anticipated that NRW guidance for the tidal areas of the SAC rivers in Wales (including those in Pembrokeshire) will be published in the future.
- The County's main transport infrastructure is formed by the Trunk Road network, railway connections to Pembroke Dock, Goodwick and Milford Haven and the ferry ports at Pembroke Dock and Fishguard Harbour. Haverfordwest Airport functions as part of a network of a small regional airports.
- A number of Pembrokeshire's main towns have historic town centres, some which have struggled commercially in recent years. The Covid-19 pandemic

<sup>8</sup> Pembrokeshire Economic Profile (PACEC) LDP 2 Evidence Base

has added to the challenges in the historic town centres and these must now adapt to reduced footfall and significant competition from online shopping. Town centres are increasingly being seen as foci for a range of community-related land uses, with a broader focus than the traditional retail uses. Pembrokeshire's planning policy framework in this regard is being modified to reflect updated thinking, for instance as set out in Welsh Government's Future Wales – the National Plan 2040.

## Strategic context

### National Context

- 1.6 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.
- 1.7 The **Environment Act 2016** puts in place the legislation to plan and manage Wales' natural resources. It includes an enhanced biodiversity duty which requires Public Authorities to maintain and enhance biodiversity and to promote the resilience of ecosystems.
- 1.8 The Plan must 'have regard' to **Future Wales – the National Plan 2040**. The role of Future Wales is defined by legislation and by the Programme for Government – Prosperity for All: the national strategy. This states that it has an important role in driving sustainable growth and combating climate change by guiding strategic development over the next 20 years.”. Future Wales has Development Plan status across Wales. There are various provisions in Future Wales that directly relate to Pembrokeshire. A number of settlements in Pembrokeshire are identified as Regional Growth Centres through FW Policy 29 (Regional Growth Areas – Carmarthen and the Haven Towns). The towns in question, in Pembrokeshire, are Haverfordwest, Milford Haven, Pembroke and Pembroke Dock. Future Wales envisages managed growth relating to their important sub-regional functions and strong links to the National Growth Area of Swansea Bay and Llanelli. Policy 32 of Future Wales specifically relates to the Haven Waterway and Energy. It recognises the potential of this location for new renewable and low carbon energy-related development, innovation and investment. It says that new energy-related development should support local and regional communities and provide jobs and investment in training and skills. In a planning application for energy proposals context, it adds that consideration should be given to the contribution to decarbonising energy supplies, to the impacts on the landscape, seascapes, natural and historic environment and to the economic benefits they would bring to the region. On-shore developments associated with off-shore renewable energy projects will be supported in principle. A further element of Future Wales is that one of the pre-assessed areas for Wind Turbine Development extends into a part of eastern Pembrokeshire.

1.9 **Planning Policy Wales** (Edition 12) (PPW) is the Welsh Government's land use planning policy for Wales and should be taken into account when preparing development plans. **Technical Advice Notes** (TANs) and **Minerals Technical Advice Notes** supplement this with technical guidance. Procedural guidance is also set out in Welsh Government Circulars.

1.10 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 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.

## Regional Context

### Swansea Bay City Deal and Celtic Freeport

1.11 Pembrokeshire sits on the most westerly point of the Swansea Bay City Region (the City Region).<sup>9</sup> The City Region was identified on the basis of existing travel to work flows, the potential for increased connectivity, the tradition of social and economic interdependence and existing partnership working.

1.12 The City Region comprises the geographies of the four South West Wales Local Authorities: namely Carmarthenshire, Neath Port Talbot, Pembrokeshire and Swansea. The City Deal is expected to give the Swansea Bay City Region a permanent uplift in its GVA of £1.8 billion and will generate almost 10,000 new jobs over the next 15 years. The total investment package is made up of £241 million UK and Welsh Government funding, £396 million other Public Sector investment and £637 million from the Private Sector.

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<sup>9</sup> City Regions Final Report, Welsh Government (2012)



Council, City and County of Swansea, the Pembrokeshire Coast National Park Authority and the Brecon Beacons National Park Authority on a SDP for South West Wales. It will also work with authorities in the neighboring Mid Wales region on matters of common interest, including minerals and waste planning and addressing river water quality issues.

### Enterprise Zones

1.18 The Haven Waterway in Pembrokeshire is one of seven Enterprise Zones launched in Wales by the Welsh Government in 2012. It includes sites adjoining the north and south shores of the Milford Haven Waterway, Haverfordwest, Trecwn and Fishguard. The Enterprise Zones have spatial boundaries. In the case of the Haven Waterway, the incentives available within those boundaries are of a solely fiscal nature and there is no dedicated planning scheme. A Strategic Plan for the various Enterprise Zones was published by Welsh Government in 2015 and updated in 2017. The related Board for the Haven Waterway Enterprise Zone was re-established in July 2022.

### Neighbouring Planning Authorities

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 Authority.

### Local context - Pembrokeshire

- ~~Pembrokeshire has an ageing population, and the over 65 population is projected to increase~~ The 2018-based projections that are used to derive the future accommodation need within the preferred projection variant include data on the age of the future population in Pembrokeshire. These indicate that the population aged 65 or over is going to increase dramatically in the County over the plan period; from 32,343 in 2021, to 43,175 in 2033, a rise of 33.5% (some 10,832 people) The projections also suggest that there will be an increase in the number of households headed by someone over 65 in Pembrokeshire from 20,451 in 2021, 28,331 in 2033, an increase of 38.5%.

The projections indicate that the proportion of older persons living alone in Pembrokeshire will decrease from 47.1% in 2021, to 43.9% in 2036.<sup>10</sup>

- Pembrokeshire's 0-15 age group is projected to decline between 2017-2033.
- Pembrokeshire has comparatively low productivity rates per job compared with the rest of Swansea Bay, Wales or the rest of the UK. The Brexit referendum decision has affected how the local economy performs, although not all the anticipated impacts have been as severe as anticipated. A London School of Economics Report<sup>11</sup> estimated an impact of -1.1% to -1.8% in GVA for Pembrokeshire. Clearly, the recent success of the Celtic Freeport bid will have positive local impacts over the coming years, through to 2050.
- Pembrokeshire's economy is relatively well contained; that is, most people who live in Pembrokeshire work in Pembrokeshire. That might change in the future, particularly in terms of construction phases of projects coming forward in conjunction with the Celtic Freeport.
- There is a market failure issue which makes developing business properties for industry economically challenging.
- There are major challenges and opportunities associated with de-carbonising heavy industry in Pembrokeshire, particularly that along the Milford Haven Waterway. The transition of port-related industrial and energy developments is emerging through various projects, including the Milford Haven: Energy Kingdom proposal, which is focused on hydrogen technology. Again, this will link in with the Celtic Freeport proposal.
- Green Infrastructure provision is now recognised to be of critical importance in delivering sustainable development.
- Tourism is increasingly important to our economy, employing 12,437 with a total visitor spend of £590million in 2019<sup>12</sup> (a rise from £515.54million in 2012).
- In parallel to the transition to energy generation from renewable sources, the oil and gas sector will transition to lower carbon and zero carbon alternatives over the next few years, in particular focusing on hydrogen technology.
- Households tend to be smaller than in previous decades. This will have implications for the number of houses and types of housing people need.
- 84.8% of Pembrokeshire households have access to a car or van, which compares to 74% as the Welsh average<sup>13</sup>.
- Climate change is resulting in higher global temperatures. Although the extent of likely change is still uncertain, we can expect to see sea-level rises,

<sup>10</sup> See [Paragraph 6.35 of Pembrokeshire's Local Housing Market Assessment, 2023 Pembrokeshire's Local Housing Market Assessment, 2022.](#)

<sup>11</sup> Local Economic Effects of Brexit, LSE 2017 <http://cep.lse.ac.uk/pubs/download/brexit10.pdf>

<sup>12</sup> Economic Impact of Tourism Pembrokeshire 2020, Destination Research <https://www.visitpembrokeshire.com/wp-content/uploads/Economic-Impact-of-Tourism-Pembrokeshire-Report-2020.pdf>

<sup>13</sup> 2021 Census. By Local Authority area.

generally warmer weather and higher rainfall in winter and more extreme weather events.

- The 2016 State of Wildlife report for Pembrokeshire highlights that the majority of features assessed are in poor or moderate condition and the overall trend is still declining. (23 features were assessed: 16 poor or moderate condition, but the trend is also important. 7 declining; 8 stable; 5 improving; 3 data deficient. Of those identified as stable, 5 were stable at a poor or moderate condition. Only 2 are stable at a good condition.)
- There is a growing trend in inequality of both income and wealth.
- Broadband and mobile infrastructure requires investment and improvement. There are ongoing improvements taking place currently, for instance through the roll out of fibre to the property broadband connections in the Pembrokeshire towns.
- The agricultural sector is facing structural change with the increasing growth of larger farm units. Major challenges include [the introduction of the Water Resources \(Control of Agricultural Pollution\) \(Wales\) Regulations Nitrate Vulnerable Zones \(NVZs\) designation](#), bovine TB, loss of farm subsidies (EU), concerns over run-off of other nutrients and changes in global markets.
- Hywel Dda Health Board is undertaking a Transformation of its Clinical Services – this will have implications for the way in which services in Pembrokeshire are delivered. There are proposals for a new sub-regional hospital serving Pembrokeshire and Carmarthenshire, although this may not be located in Pembrokeshire.

### Key Issues and Drivers

1.20 The following key issues and drivers have been identified for the LDP. These have been influenced by evidence from the Council's Review Report, a review of key documents and engagement with Stakeholders.<sup>14</sup> They are grouped under the headings identified in the Pembrokeshire Well-Being Plan (2018). These headings are embedded in the replacement LDP's Preferred Strategy and have been carried through to the Deposit Plan 2 document. However, the Pembrokeshire Well-Being Plan is regularly updated and the latest version (2023) includes a revised set of Well-being Objectives, which are as follows:

1. Support growth, jobs and prosperity and enable the transition to a more sustainable and greener economy.
2. Work with our communities to reduce inequalities and improve well-being.
3. Promote and support initiatives to deliver decarbonisation, manage climate adaptation and tackle the nature emergency.
4. Enable safe, connected, resourceful and diverse communities.

<sup>14</sup> See Reports on Public Consultation Events <https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base>

## LIVING AND WORKING

- In 2033 households will be smaller and there will be more households than now, resulting in a need for additional housing.
- In 2033 Pembrokeshire's population will be ageing with more people aged over 65, and fewer young people. This will result in an increased need for suitable housing for older people.
- There is a need to address out-migration of young people through housing, employment and vibrant town centres.
- There will be a continued need for high levels of affordable housing.
- There will be a continued need for Gypsy and Traveller accommodation pitches.
- Small and medium sized housing sites are more likely to be brought forward by the developers operating in the local housing market of Pembrokeshire.
- Historically some large Strategic Employment Sites have been slow in delivery. However, the current period is one of transformation and change, as Pembrokeshire adapts to a lower carbon and ultimately a zero carbon future. The recent success of the Celtic Freeport bid is likely to help in that regard.
- There is a need to ensure that local employment sites come forward to support employment in communities.
- Employment sites should be appropriate in scale for communities.
- Agile working and new technology presents new employment opportunities. The Covid-19 pandemic led to a significant change in working practices, including a shift to home-based and hybrid working for many, which has in some cases increased demand for work or office space at home
- Pembrokeshire is part of the Swansea Bay City Region and hence benefits from aspects of the Swansea Bay City Deal, including new job opportunities.
- The Haven Waterway Enterprise Zone also offers employment opportunities.
- The success of the Celtic Freeport bid will, over a long time period running to 2050, create significant numbers of new jobs, bring in major new investment and facilitate low carbon and zero carbon transformation (including hydrogen technology) along the Haven Waterway and offshore floating wind energy proposals in the Celtic Sea.

## RESOURCEFUL COMMUNITIES

- The scale and location of housing development, employment and community facilities can all have an impact on the Welsh language.
- There is a need to recognise the value of language, heritage, culture, landscape and townscape in placemaking.
- Appropriate infrastructure provision to support communities should be delivered through new development.

- Access to good levels of services and facilities helps to support and maintain strong communities.
- Most town centres are struggling with higher than average vacancy rates and fewer retail allocations will be needed than in the past

### TACKLING RURALITY

- Reduced facilities in rural areas can make it harder for communities to access services.
- Access to sustainable transport schemes are key to supporting healthy well connected communities. Active Travel proposals are now being delivered across Pembrokeshire, to assist with sustainable travel on foot, by cycle and by public transport.
- Improved broadband and digital communication can assist in supporting access to services and business opportunities.
- Diversification of traditional businesses can support rural communities.
- For Minerals a new approach to apportionment for sand and gravel is being introduced for Pembrokeshire, Carmarthenshire and Ceredigion, to help reduce future production within the National Park.

### PROTECTING OUR ENVIRONMENT

- The majority of Pembrokeshire's species and habitats are in moderate or poor condition despite conservation efforts, hence there is an ongoing need to protect and enhance biodiversity and the resilience of ecosystems.
- Tourist demand is changing and this needs to be taken into account in preparing the replacement LDP, including where new sites can be located and / or where existing sites can be extended.
- Climate Change is already and will continue to have impacts on communities (particularly coastal or at risk of flooding) and the environment.
- Open space and green infrastructure needs to be protected to support the well-being of communities and biodiversity.
- Directing development to locations with an available public sewerage network and wastewater treatment works with headroom and an up to date Environmental Permit will help to protect the environment.
- It is necessary to respect the benefits of green spaces and their contribution to wildlife, habitats, biodiversity and sense of place and where possible, ensure that this is reflected in the density of new housing developments.
- It is also necessary to ensure that the historic environment is recognised and protected, conserved and enhanced.
- Renewable, low energy, sustainable energy use and grid access should be supported within housing developments.
- Intensification of agricultural practices may have impacts on the environment, including nutrient run-off into water courses. The introduction of [the Water](#)

[Resources \(Control of Agricultural Pollution\) \(Wales\) Regulations Nitrate Vulnerable Zones](#) is one response to this.

- A significant problem has emerged with regard to phosphate pollution in the riverine (non-tidal) Cleddau and Teifi catchments. There are various causes including agricultural run-off, development and failure of critical infrastructure.
- There should be a focus on waste prevention and, where that is not possible, its re-use, recycling and the recovery of waste products. PCC is now achieving high rates of recycling for waste generated within the County, but there are still challenges to be met.
- Sustainable drainage systems (SuDS) can help to protect our environment. These can be introduced in conjunction with new development in most locations in the Council's planning area. Their use is regulated through the SuDS Approving Body (SAB).

## 2. VISION AND OBJECTIVES

- 2.1 Welsh Government guidance and policy requires Local Development Plans to set out a concise, long-term vision and strategy. They suggest that this Vision should be clear, agreed by the community and stakeholders and set out how places are planned to develop, change or be conserved (Planning Policy Wales, Edition 12 (Section 1.26) and Welsh Government Local Development Plan Manual – Edition 3 – March 2020, Section 5.11).
- 2.2 The Draft Vision has been developed following discussions with County Councillors and Key Stakeholders and through the ongoing SA/SEA process<sup>15</sup>. The Vision reflects key 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.<sup>16</sup>

### LDP Vision

**In 2033 Pembrokeshire will be a place with strong resourceful communities, where challenges of rurality and climate change are successfully tackled. A distinctive sense of place exists based on its natural landscape, cultural, built and linguistic heritage. The Haven Towns operate as Regional Growth Centres for South West Wales. Homes are provided for all and a strong economy enables people of all ages to live, work and thrive in the County. Employment opportunities linked to start-up businesses, tourism, rural diversification, the green and blue energy industry and new sectors linked to the strategic opportunities provided by the Milford Haven Waterway and links to Ireland are promoted. Town Centres are vibrant places where a range of uses take place. Development is supported by key infrastructure. Across the County green infrastructure and biodiversity are enhanced with accessible and healthy environments delivered for both people and wildlife.**

<sup>15</sup> 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>

<sup>16</sup> See Draft, Issues, Vision and Objective 2018 (Appendices) at <https://www.pembrokeshire.gov.uk/local-development-plan-review/strategic-options>

## LDP Objectives

- 2.3 LDPs should indicate clearly the Plan's main objectives, along with the broad direction of change.
- 2.4 It is important that the LDP Objectives reflect the Plan's Vision and set out how the issues identified as facing the area will be addressed through the LDP. The Draft Objectives were developed in conjunction with County Councillors and Key Stakeholders and through the ongoing SA / SEA process.
- 2.5 The LDP objectives deliver the 5 Key Principles identified in Planning Policy Wales which represent a guiding vision for all development plans to ensure that planning facilitates the right development in the right place and delivers the goals and five ways of working set out in the Well-being of Future Generations Act. (See Table 1).

- A) Mitigate and respond to the challenge of Climate Change.**
- B) Deliver high quality development where place-making is supported by sustainable design which responds appropriately to cultural and built heritage, landscape and townscape.**
- C) Sustain and enhance the rural and urban economy by supporting start-up businesses, rural diversification, changing agricultural practices, the visitor economy, and the expansion of Small and Medium Enterprises.**
- D) Sustain resourceful communities by providing a range and mix of homes supported by key community facilities and services.**
- E) Build on the County's strategic location for green/blue energy, maritime and port related development.**
- F) Protect and promote the Welsh language.**
- G) Support a range of uses in Town Centres to assist regeneration.**
- H) Promote accessible and healthy environments for both people and wildlife through the protection and delivery of green infrastructure.**
- I) Improve access to goods and services by facilitating improvements in infrastructure<sup>17</sup> and community facilities and directing development to sustainable locations.**
- J) Protect and enhance the County's environment, biodiversity and habitats.**
- K) Prevent waste arising and ensure resources are used responsibly.**

<sup>17</sup> Note that infrastructure includes mobile and broadband provision, transport improvements and sewerage capacity.

Table 1: The LDP Objectives and their relationship to PPW Key Planning Principles

	A) Mitigate and respond to the challenge of Climate Change.	B) Deliver high quality development where place-making is supported by sustainable design which responds appropriately to cultural and built heritage, landscape and townscape.	C) Sustain and enhance the rural and urban economy by supporting start-up businesses, rural diversification, changing agricultural practices, the visitor economy, and the expansion of Small and Medium Enterprises	D) Sustain resourceful communities by providing a range and mix of homes supported by key community facilities and services.	E) Build on the County' s strategic location for green energy, maritime and port related development	F) Protect and promote the Welsh language.	G) Support a range of uses in Town Centres to assist regeneration.	H) Promote accessible and healthy environments for both people and wildlife through the protection and delivery of green infrastructure.	I) Improve access to goods and services by facilitating improvements in infrastructure[1], and community facilities and directing development to sustainable locations.	J) Protect and enhance the County' s environment, biodiversity and habitats.	K) Prevent waste arising and ensure resources are used responsibly.
Maximising Environmental Protection and Limiting Environmental Impact	•	•						•	•	•	•
Facilitating Accessible and Healthy Environments		•	•	•			•	•	•		•
Making Best Use of Resources	•	•			•		•	•	•	•	•
Growing our Economy in a Sustainable Manner		•	•	•	•		•	•			
Creating and Sustaining Communities		•	•	•	•	•	•	•			

### 3. PLAN STRATEGY

#### The Strategy

##### Overview

3.1 The LDP Strategy has been developed based on a review of the evidence and in conjunction with stakeholders. It has been informed by the Sustainability Appraisal. The Strategy presents an approach through which to promote sustainable growth for Pembrokeshire in the period 2017-2033. A number of Options were considered as part of the Council's Preferred Strategy and updated to take account of the latest Welsh Government's 2018 Based Household Projections.<sup>18</sup> The Preferred Option is set out below.

##### Growth Levels

3.2 The LDP will deliver the following level of growth over the Plan period from 2017-2033:

5,840 new homes  
and  
1,970 new jobs, but with the potential for a further 1,000 plus jobs  
arising in the initial phases of the Celtic Freeport proposals

##### Number of new Homes

3.3 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 projections and was published as part of the evidence base for the Preferred Strategy and 1<sup>st</sup> Deposit LDP.

3.4 This 2<sup>nd</sup> 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. It is proposed to utilise the same methodology as was used to identify the Preferred Strategy and Deposit 1 growth scenario. 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

<sup>18</sup> <https://www.pembrokeshire.gov.uk/local-development-plan-review/preferred-strategy>

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;
- Dwelling-led, 5 year average completion rate from 2014/15 to 2018/19 of 413 dwellings per annum;
- Dwelling-led, 10 year average completion rate from 2009/10 to 2018/19 of 378 dwellings per annum.

3.5 The housing requirement 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. Basing growth on the past 17 year 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. As demonstrated in the LDP evidence base, this higher level of growth also supports the potential delivery of a more balanced population profile.

#### Meeting the Identified Need

3.6 The Local Housing Market Assessment (LHMA) ~~2022~~ 2023 identifies that 18.3% of the total housing stock should be available as Lifetime Homes by ~~2036~~ 2037 as a result of a significant proportion of the population anticipated to have some form of disability by this date, because of the overall increase in the population aged 65 or over. The LHMA also identifies that 4.1% of total housing stock should be suitable for wheelchair users by ~~2036~~ 2037.

3.7 Space standards for all properties are identified as a requirement, in order to ensure that well-being is promoted. High level viability testing as well as site specific testing on allocated sites has informed the identification of Affordable Housing targets within the Plan. A Development Sites and Infrastructure SPG document supports the Plan and identifies specific requirements for infrastructure required on allocated sites.

#### Number of new Jobs

3.8 A jobs figure of 2,200 was initially identified based on evidence from Experian GOAD<sup>19</sup>. This has been reduced to 1,970 as a reflection of the revised population and household projections, which have resulted in a reduced housing provision figure for the Plan area for inclusion in LDP 2, Deposit Plan 2.

<sup>19</sup> See Local Employment Trends Background Paper (December 2018)  
<https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base>

However, the recent success of the Celtic Freeport bid means that this figure could be exceeded by 1,000 plus jobs within the Plan period.

3.9 The LDP ensures that appropriate opportunities to support economic growth are identified in the Plan, through specific allocations of land and by varied policy approaches. A Two County Economic Study for Pembrokeshire and Carmarthenshire has been prepared to inform this LDP. This was updated in 2020/21 to reflect the Covid-19 pandemic and also Brexit. The study has identified a need for a range of strategic Employment allocations across the Plan area that build on the unique strategic opportunities which exist based around the Ports at Fishguard and Milford Haven.<sup>20</sup> That requirement was confirmed to still be present when the Study was updated in 2020/21. Regular monitoring of employment land provision in the County takes place and has also influenced future provision of employment land in the Council's planning area. Given the significant uncertainties surrounding the economy in light of Britain exiting the European Union, the Plan seeks to ensure that flexibility exists across a range of economic policy areas to ensure that it will be possible to respond to a range of economic circumstances. 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. The Plan will work with Pembrokeshire's assets including opportunities linked to the ports, energy, new technology and marine growth sectors. Specific policy approaches in relation to agriculture, rural diversification and the tourism industry have also been identified.

### Sustainable Strategy

- 3.10 Growth is distributed across the Plan area in accordance with a spatial strategy which promotes sustainable development. As part of this a **Settlement Hierarchy** groups settlements into different categories, depending on the levels of services and facilities located within them. A weighting system has been applied which gives greatest weight to those facilities identified as being likely to reduce the need to travel and therefore most likely to be considered a sustainable location. The greatest levels of growth (housing sites of 5 or more) are located in settlements which are at a Service Village level or higher within the Settlement Hierarchy.
- 3.11 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.
- 3.12 As well as the Plan's Settlement Hierarchy, evidence from a Strategic Flood Consequence Assessment for Pembrokeshire has informed policies and allocations, ensuring highly vulnerable development does not take place in sites which are either currently at flood risk or may become vulnerable to flood risk as

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<sup>20</sup> See Two County Economic Study (Arup, 2019) <https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base>

a result of climate change in the future. Since the SFCA for Pembrokeshire was prepared, a regional Strategic Flood Consequences Assessment for SW Wales has been prepared, together with some further local assessments relating to Pembrokeshire. This additional information has also been taken into consideration in preparing LDP 2, Deposit Plan 2. Further evidence, using Development Advice Maps has been used to identify areas of the coast which should not be developed further for highly vulnerable uses, because of the risk of sea level rise, flood or coastal erosion in those areas during the anticipated lifetime of any property. The Flood Map for Planning, used to identify areas of flood risk, which will link to a new version of Welsh Government's Technical Advice Note 15, (not yet in force), is available to view on the Natural Resources Wales website and has been used as a further resource to inform the preparation of LDP 2, Deposit Plan 2.

- 3.13 Future Wales – the National Plan 2040, sets out a number of strategic placemaking principles. One of these is to increase the population density of towns and cities. In urban areas, a density of at least 50 dwellings per hectare, based on the net site area, is suggested. For Pembrokeshire, a largely rural County, LDP2, Deposit Plan 2, sets out minimum site densities for gross site areas, which are generally lower because they make allowance for matters such as highways, amenity open space, recreational open space, garden spaces, sustainable drainage systems, landscaping, planting and boundary treatments and other green infrastructure, including where necessary green buffer zones. For the towns, a gross figure of 30 dwellings per hectare minimum is generally used, reducing to 23 dwellings per hectare for Service Centres and Service Villages. Minimum densities based on net developable area would be significantly higher. There are a few occasions where a lower density is justified by site-specific factors.

#### Urban/Rural Split of Allocations

- 3.14 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 which are found in the towns. Based on past evidence, a 60% / 40% split is also more likely to be deliverable than a 70% / 30% split. This is because it directs growth to a greater range of small and medium sized sites, instead of focusing growth on a small number of large sites in urban areas. Previous experience of LDP 1, suggests that the small and medium sized sites outside towns are more easily delivered, in particular by smaller independent builders. The Plan's approach of directing more future growth to settlements with good levels of services, combined with approaches to encourage low carbon builds, incorporate ULEV charging points and promote broadband and mobile phone infrastructure should mitigate any sustainability impacts in rural areas. The use of a Settlement Hierarchy means that larger housing developments (sites of 5 or more) being

built in the rural areas will be directed to settlements with a good level of services and facilities, supporting vibrant rural areas with development that is appropriate and proportionate.

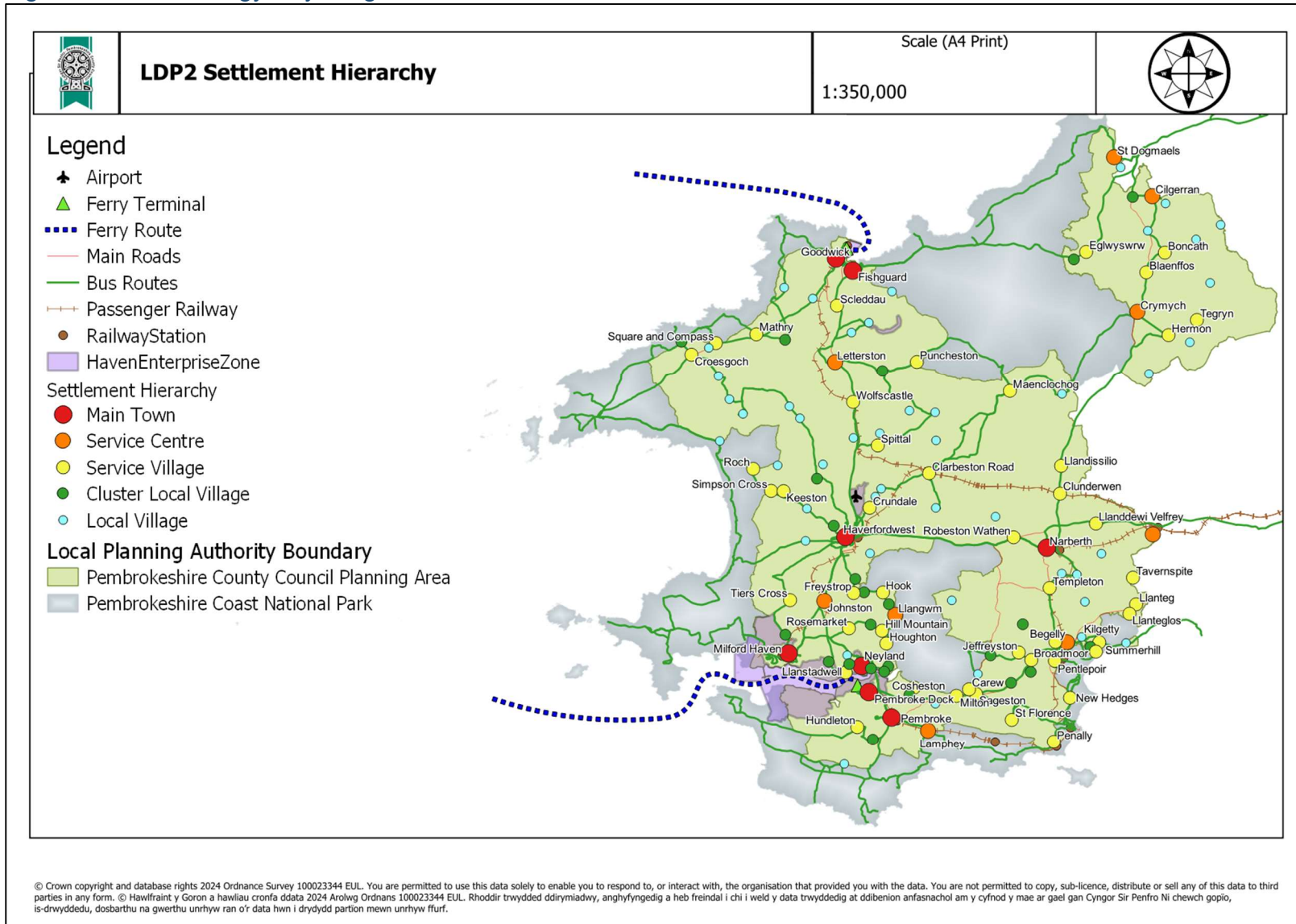
### Rural Policy approaches

- 3.15 Within the smaller settlements with fewer services in rural areas (defined as Local Villages) Settlement Boundaries identify locations considered appropriate for development (including both market and affordable housing). Those Local Villages identified as Cluster Local Villages have greater opportunities for growth, because of their relationship to other Settlements which provide key services.

### Promoting Biodiversity and Green Infrastructure

- 3.16 Across the allocated sites opportunities to both maintain and enhance biodiversity are set out in the Development Sites and Infrastructure Supplementary Planning Guidance.
- 3.17 In identifying housing and other types of allocations for the Local Development Plan, the Authority has considered GIS information on existing habitats and species. Where opportunities exist to promote connectivity of habitats, the Development Sites and Infrastructure SPG identifies particular areas of some sites that should be designed as garden spaces or green buffers. In rural areas a lower minimum density figure has been proposed for allocations to enable such provision. Open spaces have been protected across the Plan area (see GN 51 Protection and Creation of Outdoor Recreation Areas and GN 52 Protection of Open Spaces with Amenity Value). Green Wedges are also identified in order to safeguard the character of individual settlements and to provide important connectivity opportunities for wildlife.

Figure 1: LDP Strategy Key Diagram



## 4. STRATEGIC POLICIES

### SP 1 Creating Sustainable Places

All proposals must ensure that development supports the delivery of economic, social, environmental and cultural well-being and sustainable development.

Development proposals should demonstrate the following

1. Resource efficiency (see *SP 21 Waste Prevention and Management, GN 2 Sustainable Design and Placemaking and GN 4 Resource Efficiency and Renewable and Low-carbon Energy*)
2. Maintenance and enhancement of biodiversity (see *SP 12 Maintaining and Enhancing the Natural Environment, GN 1 General Development Policy, GN 41 Protection of National Statutory Environmental Designations and GN 44 Protection and Enhancement of Biodiversity*)
3. Promotion of health and well-being (see *GN 1 General Development Policy, GN 15 Housing Mix, Second homes and short-term lets, Space Standards and requirements for Lifetime Home Standards, GN 45 Green Infrastructure and GN 29 Community Facilities*)
4. Equality of access (see *SP 3 Affordable Housing Target, GN 2 Sustainable Design, GN 3 Infrastructure and New Development and GN 15 Housing Mix, Second Homes and Short-Term Holiday Lets, Space Standards and Requirements for Lifetime Home Standards*)
5. Accessibility to services (see *SP 6 Settlement Hierarchy – A Sustainable Settlement Strategy and GN 1 General Development Policy*)
6. Support for the Welsh language and culture (see *SP 19 Welsh Language*)
7. Reduced contribution to climate change [through mitigation and incorporation of measures to support climate change adaptation](#) (see *GN 1 General Development Policy, GN 2 Sustainable Design and Placemaking and GN 4 Resource Efficiency and Renewable and Low Carbon Energy*).

*Linked Key Issues: Living and Working, Resourceful Communities, Tackling Rurality and Protecting our Environment*

*This strategic policy will contribute towards achieving objectives A, D, E, F, H, I, J and K*

*Well-being Goals: A Prosperous Wales, A Resilient Wales, A More Equal Wales, A Healthier Wales, A Wales of Cohesive Communities, A Wales of Vibrant Culture and Thriving Welsh Language, A Globally Responsible Wales*

- 4.1 Local Authorities have a duty to achieve the well-being goals set out in the Well-Being of Future Generations Act and to deliver sustainable development and well-being. This policy sets out the main ways in which development proposals will be expected to demonstrate that they are supporting the delivery of

economic, social, environmental and cultural well-being and therefore contributing towards sustainable development.

- 4.2 Links to more specific Strategic and General Policies which will be used to assess whether the criteria of SP 1 are achieved are set out within the policy text.
- 4.3 In terms of achieving a prosperous Wales, it is critical that proposals can demonstrate that resource efficiency has been considered in the design of any proposal.
- 4.4 In order to promote a resilient Wales, proposals must not only maintain but also enhance biodiversity and promote the resilience of ecosystems.
- 4.5 Health and well-being can be promoted in a variety of ways, in part by providing accommodation that is of a suitable size and type to cater for all needs (see GN 15 Housing Mix, Space standards and requirements for Lifetime Home Standards). The provision of Green Infrastructure (see GN 45 Green Infrastructure) and Community Facilities (see GN 29 Community Facilities) also helps to deliver these benefits.
- 4.6 Providing affordable housing and appropriate access are key aspects of how the Plan can assist in developing a more equal Wales - there are also health benefits associated with delivery of affordable housing.
- 4.7 The Plan's strategy and in particular the Settlement Hierarchy are key in supporting cohesive communities and development that is in accordance with the Settlement Hierarchy will demonstrate compliance with criterion 5 of the Policy.
- 4.8 Supporting the Welsh language will assist in supporting a Wales of vibrant culture and thriving, living, economically viable Welsh communities.
- 4.9 There are a number of ways in which climate change can be addressed as part of responding to a Wales which meets its responsibilities as a Globally Responsible Wales. This includes the principle of development and ensuring energy efficiency, low carbon and good design principles are met. The Plan's requirement for all new homes to provide Ultra Low Emission Vehicle charging points will also contribute to meeting this policy (see GN 2 Sustainable Design).

## Levels of Growth

### SP 2 Housing Requirement

Provision is made for approximately 6,425 dwellings in the Plan period, to enable delivery of a housing requirement for 5,840 dwellings (365 per year).

Development will not be permitted that would result in an adverse effect on the integrity of sites of national nature conservation importance. Proposals where adverse effects on site integrity cannot be ruled out will not be supported.

*Linked Key Issues: Living and Working*

*This strategic policy will contribute towards achieving objectives: D*

*Well-being Goals: A More Equal Wales, A Wales of Cohesive Communities.*

4.10 The growth strategy 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;
- Dwelling-led, 5 year average completion rate from 2014/15 to 2018/19 of 413 dwellings per annum;
- Dwelling-led, 10 year average completion rate from 2009/10 to 2018/19 of 378 dwellings per annum.

4.11 As discussed in the Preferred Strategy, Stakeholders supported a higher figure than the Welsh Government projection on the basis that:

- It is deliverable (in line with historic build rates). The under-delivery of 336 dwellings per annum over the first six years of the plan (2017 to April 2023) adjusts the housing requirement to 382 dwellings per annum over the remaining 10 years of the plan (April 2023 to end of 2033).
- It reflects longer term migration trends, which is appropriate given the 16 year Plan period which will take account of a range of economic trends.
- It will assist in meeting the significant backlog of affordable housing need identified in the Local Housing Market Assessment 2022 2023 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.
- The growth strategy takes account of Natural Resources Wales' phosphate guidance (published 2021 and subsequently updated) which is a constraint to

development in parts of Pembrokeshire and recognises the potential impacts on the Climate, but at a level that is in line with that delivered historically.

- It will complement the anticipated provision of new jobs during the Plan period, as referenced in policy SP 5 on Supporting Prosperity.

4.12 Detailed analysis in relation to the housing requirement is set out in the Pembrokeshire Demographic Forecasts Update 2020. Sufficient residential land is made available to meet the future needs of communities for market housing and to contribute to the need for affordable housing. The dwelling requirement includes a vacancy rate of 8.1% which includes an allowance for vacant homes, second homes and holiday accommodation.

4.13 An allowance for 585 above the housing requirement for 5,840 homes is identified in order to allow for choice, flexibility and renewal of the existing housing stock and for non-take up of sites (bringing the requirement up to 6,425 homes). This represents a 10% additional allowance.

4.14 New homes will be developed mainly on land allocated specifically for housing and in sustainable locations within defined Settlement Boundaries, with care taken to protect and enhance the natural and built environment. The scale and distribution of housing development in Pembrokeshire will address imbalances in the age profile of the population, for example by assisting young people to set up new households in rural villages. The General policies include criterion to ensure that proposals deliver appropriate bedroom numbers, achieve flexible design, appropriate space standards and Lifetime Homes requirements and meet the requirements of an ageing population.

<a href="#">15 Year Affordable Housing Estimate Table 4 page 89 of the LHMA 2023 (as at March 2025)*</a>	<a href="#">Annual Requirement Estimate</a>	<a href="#">Percentage (%)</a>	<a href="#">Estimate 10 years (2023 to 2033)</a>
<a href="#">Social Rented**</a>	<a href="#">177</a>	<a href="#">74%</a>	<a href="#">1770</a>
<a href="#">Intermediate **</a>	<a href="#">61</a>	<a href="#">26%</a>	<a href="#">610</a>
<a href="#">Totals</a>	<a href="#">238</a>	<a href="#">100%</a>	<a href="#">2380</a>

\* [net of planned supply which will overlap with GN 16 Residential Allocations and GN 17 Commitments based on a Pembrokeshire Growth Scenario of 435 per annum reduced to provide for Pembrokeshire County Council's planning jurisdiction.](#)

\*\* [see Glossary of Terms for the definition of affordable housing.](#)

[4.\\* Policy SP 2 makes provision for 5,840 additional houses in the plan area to 2033. It does so by a series of site-specific allocations for new housing development throughout the plan area in a schedule listed in Policy GN 16 and Policy GN 17. Windfall development for both large and small sites would also be permitted under Policy GN 13 Residential Development.](#)

[4.\\*However, some additional housing which would be provided for under these policies would be in the Cleddau and Teifi riverine catchment areas and would be likely to have a significant effect on a European site, because additional discharges from waste water treatment works would potentially increase the adverse effects on](#)

water quality in each river. The conservation objectives for each of the qualifying features for each riverine SAC is to return to Favourable condition status.

4.\*An appropriate assessment of the plan indicates that it will not be possible to ascertain that such increased discharges would not have an adverse effect on the integrity of the European site.

4.\*At the appropriate assessment stage of the Habitats Regulations Appraisal, therefore, a change has been made to the policy wording of the plan, so that a restriction is added to the strategic housing policy to ensure that avoiding the adverse effects depends on the appropriate timing of sewage treatment works improvement, along with other actions required within the relevant Nutrient Management Plan – see Policy 12A (formerly Policy GN 47) Water Quality and Protection of Water Resources.

**SP 3 Affordable Housing Target Provision**

The Plan will provide a minimum of 2000 new affordable dwellings (125 per year).

*Linked Key Issues: Living and Working, Resourceful Communities.*

*This strategic policy will contribute towards achieving objectives: D, F.*

*Well-being Goals: A More Equal Wales, A Wales of Cohesive Communities, A Healthier Wales.*

4.15 Everyone in the County should have access to a good quality home that meets their housing requirements. The provision of a choice of housing that is affordable to the local population is vital in achieving this.

<b>15 Year Affordable Housing Estimate Table 4 page 89 of the LHMA Draft 2023 (as at March 2025)*</b>	<b>Annual Requirement Estimate</b>	<b>%</b>	<b>Estimate 10 years (2023 to 2033)</b>
<b>Social Rented **</b>	<b>177</b>	<b>74%</b>	<b>1770</b>
<b>Intermediate **</b>	<b>61</b>	<b>26%</b>	<b>610</b>
<b>Totals</b>	<b>238</b>	<b>100%</b>	<b>2380</b>
<b>* 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</b>			

4.16 This [target provision](#) is based on historic and anticipated levels of delivery of affordable housing rather than on the level of need. The need for affordable housing in Pembrokeshire is so high that it is considered too great on which to build a realistic [target provision](#). The figure is based partly on historic delivery but also recognises that in the future Pembrokeshire County Council is now building Council houses for the first time in many years. The 2000 new affordable dwellings figure presented in this policy translates to 125 affordable dwellings per year between 2017 and 2033.

4.17 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, through the use of planning obligations, can contribute towards the provision of affordable housing and this provision alongside provision through the Social Housing Grant results in the 2000 [target provision](#) figure.

4.18 The General Policies include policy approaches that stipulate the provision on some Housing allocations of 100% Affordable Housing where delivery is planned by the Council or a Registered Social Landlord. GN 20 Local Needs Affordable Housing seeks to ensure appropriate affordable housing provision is made on all new market housing sites. GN 21 Exception Sites for Local Needs Affordable Housing sets out the policy approach for exception sites for Affordable Housing.

Mechanisms for delivery through Community Land Trusts are supported through Affordable Housing Supplementary Planning Guidance as well as by Registered Social Landlords and Pembrokeshire County Council

- 4.19 The County Council has undertaken viability appraisals to establish indicative (percentage) targets for developer provision of affordable housing on key allocated sites, over 40 units in size and detailed information on targets is set out in the GN 16 Residential Allocations.

#### **SP 4 Gypsy, Traveller and Show-people's Accommodation**

Provision will be made for new Gypsy, Traveller and Show-people sites and pitches through the following measures:

1. The allocation of extension sites at ~~Castle Quarry, Pembroke,~~ Kingsmoor Common, Begelly and Withybush and a new site adjacent to Monkton Recreation Ground; and
2. Providing a framework to assess proposals for additional Gypsy, Traveller and Show-people sites and pitches.

Development will not be permitted that would result in an adverse effect on the integrity of sites of national nature conservation importance. Proposals where adverse effects on site integrity cannot be ruled out will not be supported.

*Linked Key Issues: Living and Working, Resourceful Communities.*

*This strategic policy will contribute towards achieving objectives: B, D.*

*Well-being Goals: A More Equal Wales, A Wales of Cohesive Communities.*

- 4.20 Pembrokeshire has a well-established community of Gypsies, Travellers and Show-people. The Council has assessed the need for Gypsy, Traveller and Show-people sites over the Plan period up to the end of 2033. The Gypsy Traveller Accommodation Assessment (GTAA) 2019 identified an immediate need for 9 new residential pitches to accommodate Gypsies and Travellers by the end of 2024. The GTAA 2019 estimates a need for a further 30 pitches from 2025 to 2033, totalling a requirement of 39 pitches by 2033. Since the GTAA was prepared in 2019, planning permission has been granted for 14 Gypsy and Traveller pitches (January 2024) and the immediate need has been met. The GTAA concluded there is no requirement either for a specific site for Travelling Show-people or for a transit site. In accordance with the Housing (Wales) Act 2014, the Council will undertake a new GTAA every five years, with work on a new GTAA expected to commence in 2024.

Table 2 Gypsy, Traveller and Show-people Need over the Plan Period (based on the GTAA 2019, with updates)

Type / Location of Need	2019-2024	2025-2033	Total Need LDP Plan Period	Allocation Required in LDP?
Residential	9 pitches Since 2019, planning permission granted for 14 pitches. The immediate need has been met.	30 pitches Since 2019, planning permission granted for 14 pitches, of which 9 pitches meets the immediate need and the longer term need can be reduced by 5 pitches.	39 pitches Since 2019, planning permission granted for 14 pitches, so the total need has reduced to 25 pitches.	Yes <a href="#">Land is allocated for site extensions at Castle Quarry, Pembroke for a net gain of 4 pitches,</a> Kingsmoor Common, Begelly for a net gain of 11 pitches, Withybush for a net gain of <a href="#">20-5</a> pitches and on a new site adjacent to Monkton Recreation Ground for <a href="#">20-15+</a> pitches.
Travelling Show People	0 pitches	0 pitches	0 pitches	No
Transit Pitches	0 pitches	0 pitches	0 pitches	No
Total Pitches required in the LDP Plan period	The immediate need of 9 residential pitches has been met plus a further 5 pitches (to	30 pitches has reduced to <a href="#">18-25</a> pitches (2025-2033). (Planning permission has been	39 residential pitches has reduced to <a href="#">18-25</a> pitches. Planning permission has been granted for 14	<a href="#">Yes</a> Allocations for site extensions at <a href="#">Castle Quarry Pembroke for a net gain of 4 pitches,</a>

	January 2024).	granted for 5 additional pitches <del>and land is allocated for 19 pitches</del> ).	<del>pitches and land is allocated for 19 pitches.</del> 0 Travelling Showpeople pitches 0 Transit pitches	Kingsmoor Common, Begelly for a net gain of 11 pitches, Withybush for a net gain of <del>20-5</del> pitches and on a new site adjacent to Monkton Recreation Ground for <del>20</del> <u>15+</u> pitches.
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Please Note: Need prior to 2019 has been met.

- 4.21 Policy GN 24 'Gypsy and Traveller Site Allocations' identifies ~~four~~ three locations for extensions to existing Gypsy and Traveller sites which could provide a net gain of ~~55-31~~ additional local authority pitches. Policy GN 25 'Gypsy, Traveller and Show-people's Sites' provides a criteria-based policy to assess proposals for new sites or pitches throughout the Plan period. Pembrokeshire County Council has an extremely strong record of approving private pitches.
- 4.22 The GTAA 2019 notes that 55 pitches had gained planning permission in Pembrokeshire since the first GTAA was produced in 2010 and of these, 40 were on private sites.
- 4.23 Since the 2019 GTAA was prepared, planning permission has been granted for a further 14 private pitches as at January 2024. The Council is therefore confident that a criteria-based policy represents an effective mechanism of meeting need. The future requirements for, and take-up of pitches will be closely monitored having regard to the GTAA, using the monitoring framework and Annual Monitoring Report. A monitoring indicator will require early review of the Plan if pitches are not being provided in order to meet the immediate need identified in the GTAA.

### SP 5 Supporting Prosperity

Based on economic forecasting, the Plan will support the delivery of an estimated 1,970 jobs across Pembrokeshire to support prosperity and economic growth. To enable this to happen, 164.91 hectares of employment land is allocated across the Plan area (this figure does not include the existing employment sites safeguarded by policy SP 15). In addition to this, the recent success of the Celtic Freeport bid provides an expectation that there will be further job growth over and above that based on previous economic forecasting. In the Plan period, it is anticipated that a further 1,000 jobs (over and above the 1,970 already forecast) might be delivered, although the Freeport proposals are currently at too early a stage in their development to provide a more accurate estimate, or differentiate between construction and operational phase jobs.

Development will not be permitted that would result in an adverse effect on the integrity of sites of national nature conservation importance. Proposals where adverse effects on site integrity cannot be ruled out will not be supported.

*Linked key issues; Living and Working, Resourceful Communities and Tackling Rurality.*

*This strategic policy will contribute towards achieving objectives C, E and I.*

*Well-being Goals: A Prosperous Wales, A Wales of Cohesive Communities, A More Equal Wales.*

4.24 Economic forecasts indicate the potential for the Pembrokeshire economy to provide an additional 1,970 jobs between 2017- and 2033. This figure has been identified based on evidence of projected demand from Experian Goad, adjusted to take account of changes since 2018 (in particular revised population and household projections and a reduced housing provision figure for the Plan period).<sup>21</sup> The projected workforce jobs set out in the Local Employment Trends Background Paper in 2018 rose from 62,200 in 2017 (the Plan's base date) to 64,400 in 2033, an increase of 2,200. This figure has been reduced to 1,970, to reflect the updated population and household projections that are now available, which have also resulted in a down-rating of the housing provision figure from 425 per annum to 365 per annum for LDP 2, Deposit Plan 2.

4.25 The policy makes reference to the recent success of the Celtic Freeport bid and the prospect that further growth in numbers of jobs created will arise from this. The proposals linked to this are currently at an early stage in their formulation, but the expectation is that across the various Freeport sites in Pembrokeshire and Neath-Port Talbot, 16,000 jobs will be created in the period to 2050. Clearly, these will be spread across the two Counties and will, in part, be provided outside the LDP 2 Plan period. A pro-rata adjustment of the 16,000 jobs to cover the period 2023-2033 gives a figure of 5,926 jobs and if it is

<sup>21</sup> <sup>21</sup> See Local Employment Trends Background Paper (December 2018)

<https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base> - but noting that updated population and household projections have been published since this was prepared.

assumed that there is an equal split between Pembrokeshire and Neath-Port Talbot, that equates to 2,963 jobs each. That figure is approximately 1,000 jobs more than LDP 2's economic forecast of 1,970 jobs. Some of the 1,970 will form part of the Freeport proposals, others not. Hence the uplift of 1,000 jobs above the 1,970 jobs already forecast for the Plan period is likely to be a minimum and could be higher. There is also great uncertainty over the construction and operational phase aspects of the Freeport jobs, with a likelihood that the former would be temporary jobs but might significantly exceed the longer term operational-phase jobs.

- 4.26 The LDP will support this delivery through a range of policy mechanisms. A key mechanism to allow this to happen is through the allocation of employment land in Use Classes B1, B2 and B8, recognising that turnover on existing employment sites will also influence the amount of new provision ultimately achieved.
- 4.27 A Two County Economic Study (2019) has been produced to inform the allocation of strategic sites within the Plan (see SP 14 Employment Land Provision). Strategic policies on Port and Energy Related Development (SP 13), Retail Hierarchy (SP 16), Visitor Economy (SP 17), Non-Energy Minerals (SP 18) and Waste Prevention and Management (SP 21) will also support delivery of this Plan's overall job figure. The Two County Economic Study was updated in 2021, but has not been further revised to reflect the recent success of the Celtic Freeport bid. There is insufficient information currently available to be certain whether the Freeport will result in the identification of further major industrial sites, particularly along the Haven Waterway. Early indications are that use will be made of land already within the operational site areas of existing major industrial sites, but the possibility of new sites or extended existing sites cannot be discounted at this early stage.
- 4.28 General policy approaches within the Plan will support local employment sites, home working and rural diversification.
- 4.29 Given the uncertainties around the economy associated with Britain exiting the EU, it is critical for the Plan to provide sufficient flexibility to respond to changing circumstances. This flexibility will in part be created by criteria-based policies which will enable applications on sites outside allocations to be considered.

## Spatial Strategy

### SP 6 – Settlement Hierarchy – A Sustainable Settlement Strategy

A settlement hierarchy has been defined on the basis of functional characteristics and availability of services and facilities, (including sustainable transport), with respect also for the existing size and built character of a settlement. The hierarchy is as follows:

#### 1. Urban Settlements

Regional Growth Areas identified in Future Wales – the National Plan 2040 (Welsh Government)

**Haverfordwest**  
**Milford Haven**  
**Pembroke Dock**  
**Pembroke**

Other urban settlements:

**Fishguard**  
**Goodwick**  
**Neyland**  
**Narberth**

#### 2. Rural Settlements

2a Service Centres:

<b>Cilgerran</b>	<b>Crymych</b>	<b>Johnston</b>
<b>Kilgetty</b>	<b>Lamphey</b>	<b>Letterston</b>
<b>Llangwm</b>	<b>St Dogmaels</b>	<b>Whitland</b>

2b Service Villages:

<b>Begelly</b>	<b>Blaenffos</b>	<b>Boncath</b>
<b>Broadmoor</b>	<b>Carew / Sageston</b>	<b>Clarbeston Road</b>
<b>Clunderwen</b>	<b>Cosheston</b>	<b>Croesgoch</b>
<b>Crundale</b>	<b>Eglwysrw</b>	<b>Freystrop</b>
<b>Hermon</b>	<b>Hill Mountain</b>	<b>Hook</b>
<b>Houghton</b>	<b>Hundleton</b>	<b>Jeffreyston</b>
<b>Keeston</b>	<b>Llanddewi Velfrey</b>	<b>Llandissilio</b>
<b>Llanstadwell</b>	<del>Llanteg / Llanteglos</del>	<b>Maenclochog</b>
<b>Mathry</b>	<b>Milton</b>	<b>New Hedges</b>
<b>Penally</b>	<b>Pentlepoir</b>	<b>Puncheston</b>
<b>Robeston Wathen</b>	<b>Roch</b>	<b>Rosemarket</b>
<b>Scleddau</b>	<b>Simpson Cross</b>	<b>Spittal</b>
<b>Square &amp; Compass</b>	<b>St Florence</b>	<b>Summerhill</b>
<b>Tavernspite</b>	<b>Tegryn</b>	<b>Templeton</b>
<b>Tiers Cross</b>	<b>Wolfscastle</b>	



## 2c Local Villages:

<b>Abercych</b>	<b>Ambleston</b>	<b>Barnlake*</b>
<b>Bryngwyn/Briscwm</b>	<b>Burton*</b>	<b>Burton Ferry*</b>
<b>Bwlchygroes</b>	<b>Camrose*</b>	<b>Castlemorris*</b>
<b>Cold Blow</b>	<b>Cresselly*</b>	<b>Cuffern</b>
<b>Deerland*</b>	<b>East Williamston*</b>	<b>Ffos Las (Trecwn)</b>
<b>Glandwr</b>	<b>Golden Hill</b>	<b>Hayscastle Cross</b>
<b>Lampeter Velfrey</b>	<b>Leachpool</b>	<b>Little Honeyborough</b>
<b>Little Newcastle*</b>	<b>Llandeloy</b>	<b>Llanfyrnach</b>
<b>Llangolman</b>	<b>Llanrhian*</b>	<a href="#"><u>Llanteg</u></a>
<b>Llawhaden</b>	<b>Llwyncelyn</b>	<b>Lower Freystrop*</b>
<b>Ludchurch</b>	<b>Maddox Moor*</b>	<b>Maidenwells*</b>
<b>Martletwy</b>	<b>Masclle Bridge*</b>	<b>Newchapel</b>
<b>New Inn</b>	<b>Panteg</b>	<b>Pelcomb Cross</b>
<b>Pen-y-Bryn*</b>	<b>Penygroes villas</b>	<b>Pen-y-Cwm</b>
<b>Pleasant Valley*</b>	<b>Pont-yr-Hafod</b>	<b>Portfield Gate</b>
<b>Postgwyn*</b>	<b>Poyston Cross</b>	<b>Princes Gate</b>
<b>Redberth*</b>	<b>Reynalton</b>	<b>Rhoshill</b>
<b>Sardis*</b>	<b>Slade Cross*</b>	<b>Slade Villas*</b>
<b>Stepaside</b>	<b>St Nicholas</b>	<b>St Twynells</b>
<b>Thornton*</b>	<b>Trecwn</b>	<b>Treffgarne</b>
<b>Treffynnon</b>	<b>Trefgarn Owen</b>	<b>Upper Nash</b>
<b>Uzmaston</b>	<b>Walton East</b>	<b>Waterston*</b>
<b>Wiseman's Bridge*</b>	<b>Wiston</b>	<b>Wolfsdale</b>
<b>Woodstock</b>		

Cluster Local Villages are indicated with a \* (see Policy SP 10)

*Linked Key Issues: Living and Working, Resourceful Communities and Tackling Rurality, Protecting Our Environment.*

*This strategic policy will contribute towards achieving objectives B, C, D, F and J.*

*Well-being Goals: A Prosperous Wales, A Resilient Wales, A Wales of Cohesive Communities, A Globally Responsible Wales.*

4.30 The Settlement Hierarchy has been developed on the basis of the analysis and weighting of services and facilities within settlements and will be used as the Settlement Strategy of the Plan. The Settlement Strategy directs the greatest proportion of growth to those settlements with the most existing facilities. Development will therefore be proportional to the size of a settlement, its function and character, and based on current service provision. The Urban Settlements (Main Towns with an urban character) have been identified as Haverfordwest, Milford Haven, Pembroke Dock, Pembroke, Fishguard, Goodwick, Neyland and Narberth. Further information on the methodology behind the Settlement Hierarchy is published as part of the Plan's evidence base (Urban Facilities Study 2019 and Rural Facilities Study 2019 - [www.pembrokeshire.gov.uk/local-development-plan-review](http://www.pembrokeshire.gov.uk/local-development-plan-review)).

4.31 The following matrix indicates the locations at which some types of development are likely to be accepted and shows that at every level of the hierarchy this Plan provides opportunities for a range of development and land-uses.

Policy	Urban Settlements	Service Centres	Service Villages	Local Villages
Housing Allocations	✓	✓	✓	
Windfall market housing	✓	✓	✓	✓
Local need affordable housing	✓	✓	✓	✓
Exception sites for affordable housing	✓	✓	✓	✓
Employment Allocations	✓	✓	✓	
Employment sites through criteria-based policies	✓	✓	✓	✓
Community facilities – within or well-related to settlements	✓	✓	✓	✓

### SP 7 Settlement Boundaries

Settlement Boundaries are shown for all settlements and define the areas within which development opportunities may be appropriate. In Urban Settlements, Service Centres and Service Villages Settlement Boundaries define the physical, functional and visual extent of the settlement and take into account proposed allocations. Local Village Settlement Boundaries are defined more tightly, limiting opportunities to small scale infill and rounding off, although greater opportunities exist for development in Cluster Local Villages.

All locations outside Settlement Boundaries are considered to be Countryside locations for land use planning purposes.

*Linked Key Issues: Living and Working, Resourceful Communities and Tackling Ruralness, Protecting Our Environment.*

*This strategic policy will contribute towards achieving objectives B, C, D, G and J.*

*Well-being Goals: A Prosperous Wales, A Resilient Wales, A Wales of Cohesive Communities, A Healthier Wales, A Globally Responsible Wales.*

4.32 Settlement Boundaries ensure that development takes place in sustainable locations and that the natural environment is protected. For most types of development the most appropriate location is within a Settlement Boundary, although in some cases there will be justification for an edge-of-settlement or countryside location. The General Policies clarify locations considered acceptable for specific land uses, including exceptional circumstances in which development may take place outside and adjacent to a Settlement Boundary.

### SP 8 Regional Growth Areas and Urban Settlements

Within Regional Growth Areas and other urban settlements, development will support sustainable communities, complementary relationships between growth towns, place-making and well-being by ensuring:

1. Accessibility by a range of sustainable modes of transport;
2. High quality accommodation that supports diversity within the residential market, access to existing and proposed services and the housing needs of communities;
3. Opportunities for new commercial, retail, employment, tourism, leisure, recreational, green infrastructure and community facilities.

Exceptionally, appropriate land uses which are well-related to the Settlement Boundary can take place provided they satisfy this and all other policy considerations, including compatibility with Regeneration Frameworks.

Development will not be permitted that would result in an adverse effect on the integrity of sites of national nature conservation importance. Proposals where adverse effects on site integrity cannot be ruled out will not be supported. Of particular concern are settlements where potentially nutrient issues may arise. Settlements are annotated with the suffix 'P' for phosphorous and/or 'N' for nitrogen to denote where screening and appropriate assessment for the Local Development Plan has identified nutrient issues requiring addressing.

*Linked Key Issues: Living and Working, Resourceful Communities, Tackling Rurality, Protecting Our Environment*

*This strategic policy will contribute towards achieving objectives: B,C,D,G, H, I, J*

*Well-being Goals: A Prosperous Wales, A Resilient Wales, A More Equal Wales A Wales of Cohesive Communities*

4.33 Future Wales: The National Plan 2040 identifies Haverfordwest, Milford Haven, Pembroke Dock and Pembroke as Regional Growth Areas, along with Fishguard as a strategic gateway for international movement (Fishguard Harbour is located at Goodwick). Neyland is a further urban settlement, situated close to both Milford Haven and Pembroke Dock, while Narberth town serves a large rural hinterland on the eastern side of Pembrokeshire. A significant proportion of residential development will be directed to the urban areas, focusing on the Regional Growth Areas and to Fishguard, Goodwick, Neyland and Narberth. These areas will be supported by the Plan's employment allocations, and allocations for other land uses to ensure their continued role as centres of economic, social and cultural activity. Housing Allocations are made at these settlements according to their respective positions within the settlement hierarchy as set out in the Urban Settlements and Rural Settlements background papers.

4.34 All Regional Growth Areas and other urban settlements have Settlement Boundaries identified that indicate the areas in which there is a presumption in favour of development, subject to all other policy considerations being satisfied.

Although some uses can be acceptable where they are well related to a Settlement Boundary. Areas outside the Settlement Boundaries are considered to be countryside for land use planning purposes.

- 4.35 The regeneration of town centres is a key priority and Masterplans / Regeneration Frameworks are being developed for each of the Regional Growth Areas to support and enable their regeneration. The following paragraphs set out the broad vision for main urban areas.

### **Haverfordwest P N**

- 4.36 Haverfordwest is a Regional Growth Area and the County town of Pembrokeshire, located in the centre of the County with good road links to all areas within Pembrokeshire and strong road and rail connections to the rest of south and west Wales and beyond. It is the main administrative centre of Pembrokeshire and has significant Higher Education and healthcare provision. The role of Haverfordwest as a sub-regional Centre will develop over the Plan period, with growth in population, employment opportunities and heritage and regeneration initiatives for the town centre. Housing allocations at Haverfordwest will contribute towards meeting the Plan's housing requirements. Land will be allocated for employment purposes at various locations across the town, with significant strategic opportunities at the Withybush Cluster<sup>22</sup>. The opportunity exists to build on the potential associated with the agri-food sector in this area. Haverfordwest's town centre is constrained by flood risk and topography but a regeneration masterplan was prepared in 2016, titled 'Haverfordwest – A Vision for the Future' and this highlights the opportunities to regenerate and build on the town centre's strengths.

### **Milford Haven N**

- 4.37 Milford Haven is a Regional Growth Area within Future Wales with the Haven Waterway also recognised as a major national asset and an international gateway for freight and passengers. It is the UK's fifth busiest port and it plays an important sub regional role providing jobs, leisure and retail, education and health services. The close proximity and the nature of living and working patterns in the area are re-enforced by connectivity infrastructure and in particular the number of large energy-related employment sites near the Haven waterway. Milford Haven is a town centre with a limited catchment area, and the town centre will be consolidated and improved links developed to the marina area which provides strong links to the Haven Waterway, offering opportunities to develop in the leisure, tourism and fishing industries.
- 4.38 The Waterway is a leading UK shipping gateway and therefore strategic employment sites have been allocated at undeveloped sites adjacent to the Haven Waterway with deep water access, where there is potential for deep water

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<sup>22</sup> See Two County Economic Study

berthing of vessels. Existing significant employment sites which are strategic in their nature have also been identified.

### **Pembroke Dock N**

4.39 Pembroke Dock is recognised in Future Wales – the National Plan 2040 – as being part of the important Haven Waterway, a major national asset. It is a Regional Growth Area and is also a key service, employment and retail centre in south Pembrokeshire. Opportunities exist to strengthen the town centre by selective redevelopment which could improve the environment and increase the opportunity for larger retail units. The port at Pembroke Dock connects the area to international trade and is developing as a centre of excellence for marine engineering and renewable energy related employment activity. Strategic employment sites which build on the opportunities presented by the Port and the marine engineering sector have been identified in the Plan.

### **Pembroke N**

4.40 The historic town of Pembroke is also a Regional Growth Area and will benefit from developments that further strengthen the conservation of its impressive built and natural heritage. It is an important tourist destination, as well as a town centre with a significant retail and service offer.

### **Fishguard and Goodwick**

4.41 Fishguard Port, located adjacent to Goodwick Town, is recognised in Future Wales as a strategic gateway for international connectivity in Wales, transporting passengers and freight and connecting mainland Europe, the UK and Wales with Ireland. It provides an excellent sheltered location for Irish Sea ferry service to and from Ireland, and for welcoming cruise liners, with good links to the Trunk Road network and to the rail network. Fishguard and Goodwick also play an important service role for North Pembrokeshire, with recent improvements to traffic movement and accessibility in the town centre, however they would benefit from further investment to improve their retail and service provisions and reduce the need for residents to travel to other areas for work and shopping.

### **Neyland**

4.42 Neyland has a more limited service provision than the other urban settlements around the Haven waterway, but provides important local services for its community. It benefits from a marina and a local employment site at Honeyborough.

### **Narberth N**

4.43 Narberth is an attractive rural market town in east Pembrokeshire with a niche retail offer that attracts visitors from a wide catchment area. Development in Narberth should maintain the attractiveness of the experience of living in and

visiting the market town. Residential development during the Plan period will include allocations for a range of different housing types. Employment provision is required to support this sustainable community. Although treated discharges from the Narberth Wastewater Treatment Works are into the tidal section of the Eastern Cleddau, there is a storm overflow into a non-tidal tributary and hence a need to consider the implications of the NRW Phosphates guidance in relation to riverine SACs.

### SP 9 Service Centres and Service Villages

In the various Service Centres and Service Villages, development will encourage sustainable communities, a thriving rural economy, place-making and well-being by ensuring:

1. Development is of a scale and nature identified as being appropriate for the settlement;
2. High quality accommodation of tenure(s) appropriate for the housing needs of the community;
3. Opportunities for new commercial, employment, retail, tourism, leisure, recreational, open space, green infrastructure and community facilities which are accessible and serve the local community.

Exceptionally, appropriate land uses which are well-related to the Settlement Boundary can take place provided they satisfy this and all other policy considerations.

Development will not be permitted that would result in an adverse effect on the integrity of sites of national nature conservation importance. Proposals where adverse effects on site integrity cannot be ruled out will not be supported. Of particular concern are settlements where potentially nutrient issues may arise. Settlements are annotated with the suffix 'P' for phosphorous and/or 'N' for nitrogen to denote where screening and appropriate assessment for the Local Development Plan has identified nutrient issues requiring addressing.

*Linked Key Issues: Living and Working, Resourceful Communities, Tackling Rurality, Protecting Our Environment*

*This strategic policy will contribute towards achieving objectives: B,C,D,G,H,I, J*

*Well-being Goals: A Prosperous Wales, A Resilient Wales, A More Equal Wales A Wales of Cohesive Communities*

4.44 Settlements in the rural area are classified according to a settlement hierarchy, based on evidence of facilities and services available within those settlements and their potential to accommodate further development. Those with a good range of services are considered more sustainable locations for development and are classified accordingly within the current Settlement Hierarchy.

4.45 The Settlement Hierarchy recognises that keeping services viable in rural areas is increasingly challenging and aims to support development at those

settlements where services are most likely to remain viable in the medium to long term. Allocations for housing development to meet the needs of the community, and new employment, retail and community facilities which help to sustain rural communities and increase economic prosperity are supported.

- 4.46 Pembrokeshire's Settlement Hierarchy defines the Service Centres and Service Villages as locations where a range of land uses are appropriate, and which provide for the social, economic and cultural well-being of the local community. Some uses can take place where a proposal is well-related to a Settlement Boundary, for example some types of employment proposal and affordable housing on exception sites.
- 4.47 Future Wales identifies the importance of supporting rural areas, securing economic and housing growth which in turn supports and retains a working age population and can revitalise and sustain smaller centres and communities through foundational economics.
- 4.48 This Plan's approach recognises that providing growth in sustainable rural communities may assist in providing sufficient demand to support the retention of facilities within rural settlements. Directing housing towards settlements with strong service provision, or cluster settlements who share service provision also reduces the need for residents to travel and encourages travel by other means such as walking or cycling.
- 4.49 Some of the Service Centres and Service Villages are affected by the phosphate pollution issue in the non-tidal parts of the Cleddau and Teifi river catchments, although ways are being found to allow development to take place in the future.

### Service Centres

- 4.50 Nine settlements are identified in the Settlement Hierarchy as Service Centres: Cilgerran P, Crymych, Johnston N, Kilgetty N, Lamphey N, Letterston P N, Llangwm N, St. Dogmaels and Whitland N. The Vision for Service Centres is that they consolidate and develop their roles as places where a good range and choice of services are provided, are accessible to their own population and a wider rural hinterland and reduce the need for the rural population to travel to Urban Settlements for all retail, leisure and employment purposes. The Service Centres have excellent public transport connections and are sustainable locations for development in rural Pembrokeshire. Housing, employment or mixed-use and community facility allocations are identified where appropriate for Service Centres. Cilgerran and Letterston are affected by the phosphate pollution issues although ways are being found to allow development to take place in the future. Development at St. Dogmaels is affected by operational problems at the Cardigan wastewater treatment works, which are scheduled to be resolved in 2027. Whitland is mostly located in Carmarthenshire, but a small outlier of development extends into Pembrokeshire. The Service Centre classification is a reflection of the settlement as a whole, although most elements

of planning control are administered by Carmarthenshire County Council, the neighbouring Local Planning Authority.

### Service Villages

**4.51** There are 44 villages defined in this category of the Settlement Hierarchy. Each village offers a good provision of services and facilities to meet the day to day needs of their population, but plays a more limited role for the wider population. Where appropriate sites are available, housing allocations for market and affordable housing will be identified in Service Villages, with the precise number for each village varying according to their location, service provision and capacity to accommodate development. Proposals to develop and expand employment premises in Service Villages are encouraged, as a means of reducing the need for people to travel long distances to work in towns. Some of the Service Villages are affected by the phosphate and nitrogen pollution issue although as noted above, ways are now being found to allow development to take place in the future. The affected Service Villages are listed below.

Settlement	Affected by Phosphates	Affected by Nitrogen
Begelly	-	N
Blaenffos	P	-
Boncath	P	-
Broadmoor	-	N
Carew	-	N
Clarbeston Road	P	N
Clunderwen	P	N
Cosheston	-	N
Crundale	P	N
Freystrop	-	N
Hill Mountain	-	N
Hook	-	N
Houghton	-	N
Hundleton	-	N
Jeffreyston	-	N
Keeston	P	N
Llanddewi Velfrey	P	N
Llandissilio	P	N
Llanstadwell	-	N
Maenclochog	P	N
Mathry	P	N
New Hedges	-	N
Penally	-	N
Puncheston	P	N
Robeston Wathen	P	-
Roch	P	N

Settlement	Affected by Phosphates	Affected by Nitrogen
Rosemarket	-	N
Sageston	-	N
Scleddau	P	N
Simpson Cross	P	N
Spittal	P	N
Square and Compass	-	N
Tegryn	P	-
Wolfscastle	P	N

### SP 10 Local Villages

In Local Villages, development will support and encourage sustainable communities, place-making and well-being of the local communities by ensuring:

1. Development is of a scale and nature identified as being appropriate to the village or cluster village
2. High quality accommodation of tenure(s) appropriate for the housing needs of the community
3. Employment or enterprise which would support the rural economy
4. Provides a recreational, open space, leisure, green infrastructure or community facility which serves the local community and is within or well related to the Settlement Boundary

Cluster Villages are identified as being:

<b>Barnlake <u>N</u></b>	<b>Burton <u>N</u></b>	<b>Burton Ferry <u>N</u></b>
<b>Camrose <u>P N</u></b>	<b>Castlemorris <u>P N</u></b>	<b>Cresselly <u>N</u></b>
<b>Deerland <u>N</u></b>	<b>East Williamston <u>N</u></b>	<b>Little Newcastle <u>P N</u></b>
<b>Llanrhian</b>	<b>Lower Freystrop <u>N</u></b>	<b>Maddox Moor <u>N</u></b>
<b>Maidenwells <u>N</u></b>	<b>Mascle Bridge <u>N</u></b>	<b>Pen-y-Bryn <u>P N</u></b>
<b>Pleasant Valley <u>N</u></b>	<b>Postgwyn <u>N</u></b>	<b>Redberth <u>N</u></b>
<b>Sardis</b>	<b>Slade Cross <u>N</u></b>	<b>Slade Villas <u>P N</u></b>
<b>Thornton</b>	<b>Waterston <u>N</u></b>	<b>Wiseman's Bridge</b>

Development will not be permitted that would result in an adverse effect on the integrity of sites of national nature conservation importance. Proposals where adverse effects on site integrity cannot be ruled out will not be supported. Of particular concern are settlements where potentially nutrient issues may arise. Settlements are annotated with the suffix 'P' for phosphorous and/or 'N' for nitrogen to denote where screening and appropriate assessment for the Local Development Plan has identified nutrient issues requiring addressing.

*Linked Key Issues: Living and Working, Resourceful Communities, Tackling Rurality, Protecting Our Environment.*

*This strategic policy will contribute towards achieving objectives: B,C,D,F,H,I,J*

*Well-being Goals: A Prosperous Wales, A Resilient Wales, A More Equal Wales A Wales of Cohesive Communities*

- 4.52 Villages with a limited service provision are not expected to accommodate significant levels of development during the Plan period and no housing allocations are made for Local Villages.
- 4.53 At Local Villages, Settlement Boundaries are used to provide clarity on where opportunities for infill and rounding off for housing may be suitable, and where

employment, community and other local facilities may come forward. In general Local Villages will have 1-2 plots for general market or affordable housing which may include self-build or custom build proposals. Affordable housing requirements for local villages are set out in GN 20. Cluster Villages are identified within the Settlement Hierarchy and are Local Villages which when considered as a whole, provide some services, in relatively accessible locations and reduce the need to travel. They have a functional link with a higher order centre (Service Centre or above) via a bus route into the settlement or have an active travel route option either a dedicated walking or cycle route to a higher order settlement which would amount to a maximum of 25 minutes travel time. The proposed cluster settlement must also have a weighted score of 5 or more for the facilities available.

- 4.54 For the 24 Cluster Local Villages, small scale residential development will be permitted within settlement boundaries. Small scale housing sites are capable of delivering between 1 and 5 dwellings within Settlement Boundaries, on land not allocated or protected for an alternative use. Planning proposals which seek to develop part of a larger site and which would accommodate 5 or more dwellings will not be supported. The scale of cumulative proposals will also be a consideration.
- 4.55 There are 45 Local Villages which are not Cluster Villages and where only very small scale proposals (infill) will be permitted. Proposals to increase the service provision and employment opportunities in these Local Villages, which are of an appropriate scale and nature, are encouraged.
- 4.56 Some of the Local Villages are affected by the phosphate pollution and other river water quality issues in the Cleddau and Teifi catchments, which is a constraint to future residential (and some other) development. Review of environmental permits at wastewater treatment works, new thinking in terms of 'fair share' and new investment at some wastewater treatment works is in some cases providing a way forward on this.

<u>Settlement Hierarchy Position</u>	<u>Settlement</u>	<u>Affected by Phosphates</u>	<u>Affected by Nitrogen</u>
<u>Local Village</u>	<u>Abercych</u>	<u>P</u>	<u>-</u>
<u>Local Village</u>	<u>Ambleston</u>	<u>P</u>	<u>N</u>
<u>Local Village</u>	<u>Bwlch-y-Groes</u>	<u>P</u>	<u>-</u>
<u>Local Village</u>	<u>Cold Blow</u>	<u>P</u>	<u>N</u>
<u>Local Village</u>	<u>Cuffern</u>	<u>P</u>	<u>N</u>
<u>Local Village</u>	<u>Ffos Las</u>	<u>P</u>	<u>N</u>
<u>Local Village</u>	<u>Golden Hill</u>	<u>P</u>	<u>N</u>
<u>Local Village</u>	<u>Hayscastle Cross</u>	<u>P</u>	<u>N</u>
<u>Local Village</u>	<u>Leachpool</u>	<u>P</u>	<u>N</u>
<u>Local Village</u>	<u>Little Honeyborough</u>	<u>-</u>	<u>N</u>
<u>Local Village</u>	<u>Llangolman</u>	<u>P</u>	<u>N</u>
<u>Local Village</u>	<u>Llawhaden</u>	<u>P</u>	<u>N</u>

Settlement Hierarchy Position	Settlement	Affected by Phosphates	Affected by Nitrogen
Local Village	Llwyncelyn	P	-
Local Village	Martletwy	-	N
Local Village	Newchapel	P	-
Local Village	Panteg	P	N
Local Village	Pelcomb Cross	P	N
Local Village	Penygroes Villas	P	-
Local Village	Pont - yr - Hafod	P	-
Local Village	Portfield Gate	P	N
Local Village	Poyston Cross	P	-
Local Village	Princes Gate	P	N
Local Village	Reynalton	-	N
Local Village	Rhoshill	P	N
Local Village	St Twynells	P	-
Local Village	Trecwn	P	N
Local Village	Treffgarne	P	N
Local Village	Treffynnon	-	N
Local Village	Uzmaston	-	N
Local Village	Walton East	P	N
Local Village	Wiston	P	-
Local Village	Wolfsdale	P	N
Local Village	Woodstock	P	N

### SP 11 Countryside

Proposals for development in Countryside locations will be supported where it is an essential requirement for people who live and work there and where it respects its landscape setting and the natural and built environment. Development which minimises visual impact on the landscape and relates to one of the following will be promoted:

1. Enterprises for which a countryside location is essential; including One Planet Development.
2. Opportunities for rural enterprise workers to be housed in suitable accommodation that supports their employment;
3. Appropriate agricultural diversification schemes;
4. The re-use and conversion of appropriate existing buildings, and
5. Growth of an existing business provided there are no unacceptable impacts.

*Linked Key Issues: Living and Working, Resourceful Communities and Tackling Rurality, Protecting Our Environment.*

*This strategic policy will contribute towards achieving objectives B, C, D, F, H and J.*

*Well-being Goals: A Prosperous Wales. A Resilient Wales. A More Equal Wales.*

- 4.57 All locations outside the Settlement Boundaries are considered to be countryside. Generally, national and local planning policies restrict residential development in areas defined as being in the countryside to those whose employment requires them to live in close proximity to their place of work in the countryside. Criteria for such proposals are established by national policy. In some instances conversions of traditional buildings in the countryside into residential use will be permitted where it means a traditional or historic building, which might otherwise be lost, is conserved and used. The building must be physically capable of accommodating the new use with minimal alteration to the original structure. Converting non-traditional buildings may be acceptable for employment uses.
- 4.58 Future Wales supports the foundational economy, and many rural businesses are integral to the well-being of an area. New business development proposals within the countryside will need to demonstrate that a countryside location is essential for their business. Where development has to take place to meet the essential requirements of people who live and work in the countryside, it is important that the visual impact of any development is minimised. Section 5.6 of Planning Policy Wales recognises the importance of rural business to an adaptable and resilient rural economy. Farm diversification schemes and appropriate extensions to existing businesses, for example, will be supported where they are appropriate and have no unacceptable impacts.

- 4.59 Enterprises for which a countryside location is considered essential includes One Planet Development. National Policy enables One Planet Developments to take place where they are zero carbon in construction and use and achieve an ecological footprint of 2.4 global hectares per person or less in terms of consumption, and where they can demonstrate clear potential to move towards 1.88 global hectare target over time.
- 4.60 Pembrokeshire and its wider context, has a range of important environments and landscapes, some of which are shown on the Proposals Maps as nature designations or are referenced in Supplementary Planning Guidance (SPG) such as the Landscape Character Assessment SPG, the Seascape Character SPG and the Biodiversity SPG, all of which will be updated following the adoption of the replacement LDP. In addition to the specific environments that are protected by a range of designations, there are a number of non-designated landscapes, woodlands, hedgerows, trees and species that occur across the Plan area and contribute to making Pembrokeshire a special place. Some of the species found in Pembrokeshire are of significant value to the area's ecology including European protected species such as bats, otters, dormice and the marsh fritillary butterfly.
- 4.61 Pembrokeshire's outstanding natural and historic environments are part of what attracts huge numbers of visitors every year and are a valuable resource for the County as a whole. As well as being a working environment the countryside offers a range of diverse recreational opportunities for residents and visitors. This Plan aims to protect the countryside and manage its use, so that these important elements can be provided.
- 4.62 Pembrokeshire's natural and semi-natural environments also provide benefits to the economy and society which sometimes impact on a wider location than simply the site in question e.g. Flood risk amelioration, water quality, air quality, climate change mitigation and adaptation, carbon sequestration, pollination of crops.
- 4.63 There are many challenges in maintaining a strong natural and historic environment whilst ensuring that other key objectives in the Plan, such as providing housing or building on the County's strategic location for energy and port related development, are met. General Policies, their supporting text and also Supplementary Planning Guidance that support the Plan will ensure that these challenges are managed successfully.
- 4.64 Development opportunities in countryside areas may be constrained where they are within river catchments affected by the phosphate pollution issue in the Cleddau and Teifi rivers.

## SP 12 Maintaining and Enhancing the Natural Environment

Pembrokeshire's environment (including species, habitats, landscapes and the systems which underpin them) will be maintained and enhanced by~~protected from materially harmful development.~~

~~All development proposals will be required to protect, conserve and enhance the natural environment, including:~~

~~Protecting~~Excluding national statutory environmental designations which include Special Areas of Conservation, Special Protection Areas, Sites of Special Scientific Interest and National Nature Reserves and sites containing protected species and habitats) when searching for sites for development. It will be wholly exceptional for development to be justified in such locations; and

~~Avoiding development which would result in adverse impacts on the features for which~~Protecting Local Wildlife Sites, Regionally Important Geological Sites, Local Nature Reserves make a vital contribution to delivering an ecological network for biodiversity and resilient ecosystems~~and Special Landscape Areas; and~~

~~Retaining~~Protecting natural landscape features including trees, woodland and hedgerows; and

Protecting water quality; and

~~Protecting~~Securing, ~~enhancement~~ing and ~~management~~ing of Ggreen Infrastructure links; and

Delivering a net benefit for biodiversity ~~gain~~.

In accordance with the step-wise approach when all locational, siting and design options for avoiding damage to biodiversity, trees, woodlands and hedgerows have been exhausted, applicants, must seek to minimise the initial impact and mitigate damage.

All development proposals are also required to incorporate new opportunities to enhance the condition, extent and/or connectivity of environmental features to improve the functioning and resilience of ecosystems, or to improve appropriate access to green infrastructure. Delivering environmental enhancement has combined benefits for biodiversity, climate change, health and well-being, sustainable placemaking and the economy.

Within the National Site Network, which includes: Special Areas of Conservation (SACs) and Special Protection Areas (SPAs), development will only be permitted which demonstrates compliance with the Conservation of Habitats and Species Regulations 2017, and The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (and any subsequent amendments). Proposals with the potential to have Likely Significant Effects must undertake a Stage 2 Appropriate Assessment and will only be permitted if there is no adverse effect on the integrity of the National Site, either alone, or in-combination. Proposals may also be permitted where the HRA proves there are no alternatives, and that the development is of overriding public interest (IROPI) and appropriate compensatory measures are secured.

*Linked Key Issues: Living and Working, Resourceful Communities and Protecting Our Environment.*

*This strategic policy will contribute towards achieving objectives A, H and J.*

*Well-being Goals: A Resilient Wales, A Healthier Wales, A Globally Responsible Wales*

- 4.65 The South West 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.
- 4.66 Under the Environment Act 2016, Pembrokeshire County Council has an enhanced biodiversity duty which requires it to maintain and to enhance biodiversity and promote the resilience of ecosystems. The Well Being of Future Generations Act 2015 also includes 'A Resilient Wales' as one of its goals, which requires Authorities to maintain and enhance a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change. As part of meeting these duties, the Plan will require developments to demonstrate that they have incorporated potential environmental benefits within schemes, where this is practicable.
- 4.67 Where biodiversity enhancement proportionate to the scale and nature of the development is not proposed as part of an application, significant weight will be given to its absence, and unless other significant material considerations indicate otherwise it will be necessary to refuse permission (See Planning Policy Wales 6.4 for more details).
- 4.68 Where a development has an opportunity to deliver biodiversity enhancements through its design and layout, these should be incorporated into the scheme. The introduction of the Sustainable Urban Drainage consenting regime in 2019 will, in some cases, require layouts which include opportunities for ponds and other landscape features which may support enhancements for biodiversity. Where such opportunities exist, these will be supported by the planning system, even in cases where this results in a lower density or dwelling per hectare figure than could otherwise be accommodated on the site.
- 4.69 A Development Sites and Infrastructure SPG accompanies the Plan and identifies where there are opportunities on allocated sites to promote interconnectivity of habitats by the creative use of gardens or landscaping. These site requirements have been informed by the Land Use Planning Tool

which was developed Pembroke Nature Partnership, alongside liaison with NRW and the Authority's ecologists.

- 4.70 'Pembrokeshire's Green Infrastructure Assessment (GIA, February 2023) provides a suite of projects aimed at creating healthier, more resilient environments across the County. It proposes a range of strategic scale opportunities and settlement-based projects within the towns of Fishguard and Goodwick, Haverfordwest, Milford Haven, Narberth, Neyland, Pembroke and Pembroke Dock (and at main settlements within the National Park) aimed at enhancing Green Infrastructure within settlements. The Plan identifies and protects key areas of Open Space on the Proposals Map to ensure such projects can be developed in the future. The strategic projects are not location-specific and aim to address key pressures facing Pembrokeshire, namely flooding, water quality and biodiversity decline, particularly within rivers. Specific future SPG on Green Infrastructure will identify how such features can be enhanced.
- 4.71 The Biodiversity SPG will assist in identifying opportunities for enhancements for a range of proposals. Pre-application engagement with the Council will also enable appropriate and site specific enhancements to be identified.
- 4.72 Proposals on sites allocated in the Plan will be screened for likely significant effects on Special Areas of Conservation and Special Protection Areas.

### SP 13 Port and Energy Related Development and Celtic Freeport

Development proposals for appropriate industrial and port related facilities and infrastructure, including energy proposals directly related to port locations, will be supported at the Ports of Milford Haven and Fishguard and within the Haven Waterway Enterprise Zone, where they can demonstrate that they respect and protect the landscape, natural and built environment.

Individual proposals coming forward under policy SP 13 will require project level Habitats Regulation Assessment to consider their likely significant effects on the features of the SAC. One element of this is that there must be no increase in nutrients into the Pembrokeshire Marine SAC and developers will have to demonstrate this within their proposals to ensure satisfactory HRA outcomes. Development will not be permitted that would result in an adverse effect on the integrity of sites of national nature conservation importance. Proposals where adverse effects on site integrity cannot be ruled out will not be supported.

For the avoidance of doubt and the purposes of this policy, energy proposals directly related to port locations do not include wind energy generation.

The successful Celtic Freeport bid will support the development of Wales' net zero economy, generating over 16,000 new jobs and up to £5.5 billion of new investment in the period to 2050, with the investment to be split between Pembrokeshire and Neath-Port Talbot. The bid was submitted by a consortium comprising Associated British Ports, Neath-Port Talbot Council, Pembrokeshire County Council and the Port of Milford Haven and is expected to cover about 250 hectares of land on various sites in Pembrokeshire and Neath-Port Talbot. The Freeport proposals are still at an early stage in their evolution and there are likely to be strong synergies with some of the areas covered by the Council's Port and Energy Related Development policy. However, there is an expectation that the initial phases of the developments envisaged by the Freeport will come forward during the LDP 2 Plan period.

*Linked key issues: Living and Working and Resourceful Communities.*

*This strategic policy will contribute towards achieving objectives C, E and I.*

*Well-being Goals: A Prosperous Wales, A More Equal Wales, A Wales of Cohesive Communities*

4.73 As recognised in Future Wales – the National Plan 2040, Milford Haven Port (which incorporates the dock areas at both Milford Haven and Pembroke Dock) provides internationally important and scarce deep-water port facilities in a sheltered location. Milford Haven Port already hosts major energy-related installations and infrastructure and there is potential to develop this role further. It also provides a ferry terminal, at Pembroke Dock, providing freight and very limited passenger connections to the Republic of Ireland. As well as the ferry terminal, there are extensive areas of employment land within Pembroke Dockyard and at other industrial sites close to the Waterway in Pembroke Dock. At Milford Dock, current land uses include employment, leisure, marina, residential, retail, berthing for fishing vessels and port-related engineering.

There are emerging proposals for further multi-use developments in this area. There are also other industrial sites in Milford Haven town and at nearby Neyland. Re-configuration of land uses in Pembroke Dock and Milford Haven may be proposed in conjunction with transformative development proposals.

- 4.74 Welsh Government's Future Wales – the National Plan 2040 policy document includes policy 29 on Regional Growth Areas – Carmarthen and the Haven Towns and also policy 32 on the Haven Waterway and Energy. Policy 32 identifies the Haven Waterway as a location for potential new renewable and low carbon energy-related development, innovation and investment. It is anticipated that it will support offshore floating wind turbine developments in the Celtic Sea and provide a basis for energy transformation along the Haven Waterway, including the introduction of hydrogen technology.
- 4.75 Fishguard Harbour is primarily a ferry terminal and provides freight and passenger connections to the Republic of Ireland.
- 4.76 At Fishguard Harbour (Goodwick) and at Milford Haven Port, improvements to facilities and infrastructure will benefit the local and national economy and will confer benefits on other countries, particularly the Republic of Ireland. The draft National Development Framework makes reference to the port at Fishguard and the important role it plays in supporting the maritime sector and the national economy.
- 4.77 The Haven Waterway Enterprise Zone was designated in 2012 and confers fiscal benefits to businesses locating within the Zone's boundaries. The Enterprise Zone has four separate boundaries, one around the Haven Waterway and incorporating land in the Milford Haven, Pembroke Dock and Neyland areas, one at Goodwick, one at Haverfordwest Airport / Withybush Industrial Park and one at Trecwn.
- 4.78 Policy SP 13 applies within a defined spatial area based on and incorporating many of the Haven Waterway Enterprise Zone sites. The spatial area defined recognises the areas that could be suitable for these forms of development, but the policy does not reserve these areas exclusively for such development, nor imply that all proposals will be acceptable. The acceptability of any proposals will depend on their accord with detailed General Policies and landscape, environmental and amenity considerations will be key in determining whether or not proposals in these locations are appropriate. The Enterprise Zone was designated by Welsh Government. Its boundary defines areas within which fiscal incentives are available for certain types of economic development. The Enterprise Zone boundary is shown on the designations and constraints map, as it was prepared by an external organisation. Some land within the Enterprise Zone boundary will be suitable for future economic development, but some land within the boundary has environmental, landscape and flood risk constraints which may restrict or preclude its future development. Key areas of land considered suitable for future economic development are allocated for that purpose by the appropriate policies of this Plan.

- 4.79 The success of the Celtic Freeport bid is very recent and is of great significance to Pembrokeshire and Neath-Port Talbot in terms of its potential to provide new investments and jobs over the next 27 years. It is also clearly of national importance to Wales, the UK and beyond. At this early stage there is much still to be done in terms of business planning and site and project selection for the Freeport, although in a Pembrokeshire context the development of major offshore wind energy proposals and energy transformation along the Milford Haven Waterway are going to be key elements. The Celtic Freeport fits well with the Port and Energy-related Development Proposals policy of this Plan and is consistent with Policy 32 of Future Wales – the National Plan 2040, which is specific to the Haven Waterway and Energy. [Looking ahead, as the development proposals associated with the Celtic Freeport emerge, it is likely that further consideration will need to be given to the consequential impacts on demand for residential accommodation, both during the construction phases and in the post-construction operational phases.](#)
- ~~4.80 Individual proposals coming forward under policy SP 13 will require project level Habitats Regulation Assessment to consider their likely significant effects on the features of the SAC. One element of this is that there must be no increase in nutrients into the Pembrokeshire Marine SAC and developers will have to demonstrate this within their proposals to ensure satisfactory HRA outcomes.~~
- 4.81 The seaward limit of planning control is normally the mean low water mark (however, at Pembroke Dock it is the mid-channel mark). Development proposals below this mark (or beyond the mid-channel mark at Pembroke Dock) are outside the scope of the planning system and are regulated under the provisions of other legislation.
- 4.82 In accordance with Planning Policy Wales Edition 12 and Technical Advice Note 23, the Local Development Plan provides a range of sites in sustainable locations that are suitable for development for enterprise and employment purposes.
- 4.83 Supplementary Planning Guidance will be prepared to support the designation of the Celtic Freeport, with detailed consideration to be given to what is required post adoption of LDP 2.

### SP 14 Strategic Employment Provision

Land will be provided for the development of employment land on a mix of strategic and local employment sites. Sites requiring mitigation for phosphorous or nitrogen are suffixed 'P' or 'N' respectively.

Strategic Employment sites of regional significance are identified in the following areas:

Allocation Reference	Strategic Employment Cluster Reference	Site Name	Area (hectares)	Use classes
S/EMP/086/LDP/01		Blackbridge	32.93	B1;B2;B8
S/EMP/136/00001		Former RNAD Site, Trecwn <u>P</u> <u>N</u>	21.22	B1;B2;B8
S/EMP/034/LDP/02	S/EMP/034G/C1	Goodwick, Parrog	0.61	B1; B8
S/EMP/040/00004	S/EMP/040/C1	Withybush cluster (Trading Estate) <u>P</u> <u>N</u>	16.95	B1;B2;B8
S/EMP/040/00005	S/EMP/040/C1	Withybush cluster (East of Lodge Estate) <u>P</u> <u>N</u>	5.37	B1;B2;B8
S/EMP/040/00001	S/EMP/040/C1	Withybush cluster (West Estate) <u>P</u> <u>N</u>	20.75	B1
S/EMP/086/LDP2/01	S/EMP/086/C1	Thornton Industrial Estate cluster (Hayguard Hay, Thornton)	2.64	B1; B8
S/EMP/096/00001	S/EMP/096/C3	Pembrokeshire Science and Technology Park cluster <u>N</u>	21.69	B1

In some cases, partial development of the sites has already taken place, but a substantial amount of land within their boundaries still awaits development. Also, in some cases the site may have been previously developed, but most or all of the previous use(s) will have now ceased and the site may have been partially or totally cleared of buildings.

The use classes specified for each site will be allowed, together with other uses closely related to the main employment use. Where B2 uses are proposed, these must not cause significant adverse amenity impacts on nearby land uses.

Because of the significance of these sites to the local, regional and national economy, their release for non-employment uses will only be permitted a) where closely related to the main employment use or b) in exceptional circumstances.

Development will not be permitted that would result in an adverse effect on the integrity of sites of national nature conservation importance. Proposals where adverse effects on site integrity cannot be ruled out will not be supported. Of particular concern are sites where potentially nutrient issues may arise. Sites are annotated with the suffix 'P' for phosphorous and/or 'N' for nitrogen to denote where screening and appropriate assessment for the Local Development Plan has identified nutrient issues requiring addressing under Policy 12A Water Quality and Protection of Water Resources (formerly Policy GN 47).

- 4.84 Policy SP 14 allocates strategic employment sites at a range of locations, these being sites which are either undeveloped or, where developed, a substantial amount of land within their boundaries awaits development. In some cases, the sites have previously been developed, but most or all of the previous uses have ceased and the site may have been partially or totally cleared of buildings. Related policy SP 15 safeguards various Existing Employment Sites for employment purposes, although other uses related to a main employment use may be permitted and release for other purposes may be permitted in exceptional circumstances. It will be noted that in certain cases, sites in both policies are combined within a single strategic employment cluster.
- 4.85 The Wales Spatial Plan Update 2008 identifies as a strategic priority an aim to develop a more diverse and entrepreneurial knowledge-based economy and identifies both energy and the environment as being critical to achieving success in this area. Future Wales identifies key opportunities for growth in Pembrokeshire at the Regional Growth Areas and linked to the Milford Haven Waterway. These basic principles are carried forward into the successor Future Wales document.
- 4.86 The Haven Waterway Enterprise Zone was established in 2012. Businesses within this Zone are offered fiscal incentives. As noted in the reasoned justification to policy SP 13, there are four discrete spatial areas included, these being along the Haven Waterway, at Haverfordwest, at Trecwn and at Fishguard Harbour, Goodwick. Regionally strategic sites are identified in these locations supported by evidence gathered as part of a Two County Economic Study (2019). Not all Enterprise Zone locations are allocated for strategic employment uses, for instance because some are already developed while others are within areas with nature conservation designations, high quality landscapes and / or vulnerability to fluvial and / or tidal flooding.
- 4.87 Strategic and general policies on the maintenance and enhancement of biodiversity will be particularly relevant to the delivery of strategic employment sites, to ensure the avoidance of significant adverse impact through the maintenance and enhancement of protected and priority species, their habitats and designated sites. Mitigation provisions may be appropriate in certain cases. Other key considerations are likely to include amenity (GN 1) and impacts on the environment and landscape (SP 12 and GN 1).
- 4.88 Local employment sites to meet community needs are identified at a range of other locations in the Urban Settlements and additionally in some Rural Settlements (see GN 9 Employment Allocations). This will support the plan's growth and distribution strategy in a sustainable manner.
- 4.89 The development of employment sites and premises in rural settlements is encouraged, ensuring there will be greater opportunities for the rural population to work nearer their homes or at home and thus reduce the demand for travel into Pembrokeshire's Urban Settlements for work related journeys.

Pembrokeshire already has a high level of self-employed individuals – many of whom work from home – and this will be encouraged further. Improved infrastructure, transport and communication networks will be important in encouraging such growth, including continuation of improvements to broadband availability and access to the 4G and emerging 5G mobile phone network.

4.90 In addition to identified new employment sites, a criteria-based policy approach (GN 8 Employment Proposals) provides opportunities for new 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.

4.91 Natural Resources Wales has advised that all Strategic Employment Sites at Withybush must connect to the public foul sewer. Environmental Permits for private drainage will not be issued here. It also advises that any Strategic Employment Sites which have a potential to impact on the Pembrokeshire Marine SAC will require Habitats Regulations Assessment (HRA).

**SP 15 Safeguarding of existing Strategic Employment Sites**

Land at the following sites will be safeguarded for employment purposes: Sites with issues regarding phosphorous or nitrogen are suffixed 'P' or 'N' respectively.

Allocation Reference	Strategic Employment Cluster Reference	Site Name	Area (hectares)	Use classes
S/EMP/000/00002		Pembroke Oil Refinery (Valero)	222.6	B2; B8
S/EMP/000/00003		Milford Haven petro-chemical storage facility (Puma Energy)	159.14	B8
S/EMP/000/00004		Waterston Tank Farm and LNG, Milford Haven <u>N</u>	177.35	B2; B8
S/EMP/000/00007		South Hook LNG (part)	59.75	B2; B8
S/EMP/095/00001		Pembroke Power Station <u>N</u>	139.95	Sui Generis
S/EMP/034/00003	S/EMP/034G/C1	Goodwick Industrial Estate	4.08	B1; B8
S/EMP/040/00011	S/EMP/040/C1	Withybush cluster (East Estate) <u>P N</u>	9.64	B1;B2;B8
S/EMP/040/00012	S/EMP/040/C1	Withybush cluster (North Estate) <u>P N</u>	5.19	B1;B2;B8
S/EMP/040/00015	S/EMP/040/C1	Withybush cluster (Lodge Estate) <u>P N</u>	0.96	B1;B2;B8
S/EMP/086/00003	S/EMP/086/C1	Thornton Industrial Estate cluster	20.51	B1;B2;B8
S/EMP/096/00003	S/EMP/096/C1	Pembroke Dock cluster (West Llanion) <u>N</u>	6.79	B1;B2;B8
S/EMP/096/00002	S/EMP/096/C1	Pembroke Dock cluster (Royal Dockyard) <u>N</u>	28.95	B1;B2;B8

S/EMP/096/00004	S/EMP/096/C2	Waterloo & London Road Industrial Estate cluster (Ferry Lane) <u>N</u>	3.61	B1;B2;B8
S/EMP/096/00005	S/EMP/096/C2	Waterloo & London Road Industrial Estate cluster (Kingswood) <u>N</u>	8.31	B1;B2;B8
S/EMP/096/00006	S/EMP/096/C2	Waterloo & London Road Industrial Estate cluster (Waterloo & London Road Industrial Estate) <u>N</u>	19.41	B1;B2;B8
S/EMP/096/00007	S/EMP/096/C3	Pembrokeshire Science & Technology Park cluster (Cleddau Bridge) <u>N</u>	2.33	B1

Because of the significance of these sites to the local, regional and national economy, their release for non-employment uses will only be permitted a) where closely related to the main employment use or b) in exceptional circumstances.

Development will not be permitted that would result in an adverse effect on the integrity of sites of national nature conservation importance. Proposals where adverse effects on site integrity cannot be ruled out will not be supported. Of particular concern are sites where potentially nutrient issues may arise. Sites are annotated with the suffix 'P' for phosphorous and/or 'N' for nitrogen to denote where screening and appropriate assessment for the Local Development Plan has identified nutrient issues requiring addressing under Policy 12A Water Quality and Protection of Water Resources (formerly Policy GN 47).

*Linked Key Issues: Living and Working.*

*This strategic policy will contribute towards achieving objectives B, C, E and I.*

*Well-being Goals: A Prosperous Wales, A More Equal Wales, A Wales of Cohesive Communities.*

4.92 In some cases, an element of the land within the boundaries of these existing sites will not have been developed at all or will have been released for non-employment purposes. However, the majority of the site will have been developed for employment purposes at some stage.

- 4.93 Because of the significance of these existing employment sites to the local, regional and national economy, changes of use to non-employment uses within their boundaries will only be permitted a) where closely related to the main employment use or b) in exceptional circumstances. However, where such a change of use to a non-employment use has already been permitted, the Council will not require a reversion to employment uses.
- 4.94 Pembrokeshire has a significant number of existing employment sites, many of which are of strategic importance to the County and region. Whilst policy SP 14 allocates undeveloped and partially developed sites for strategic employment purposes and includes an element of safeguarding in relation to their future use for employment purposes, there is also a need to safeguard the existing strategic employment sites within the Plan area. The latter is the purpose of policy SP 15, which recognises that although these sites are likely to be substantially developed, there will be an element of 'churn' within them as land and buildings fall out of use and then come back into use. Disused land and buildings within existing employment sites can make a significant contribution to employment land availability and their return to use is generally encouraged.
- 4.95 As noted in the policy, changes of use of land and buildings within the site boundaries to non-employment uses will only be permitted where related to the main employment use or in exceptional circumstances. That safeguarding is necessary and appropriate to ensure that these sites retain a predominance of employment uses looking ahead, to support the local and regional economy. That said, it is recognised that within site boundaries there are sometimes consented non-employment uses of various kinds and in these cases there is no requirement that these are returned to employment use, although employment-related conversions would be supported in appropriate circumstances.
- 4.96 To provide a basis for the consideration of planning proposals on these sites, they have been included within the Development Sites and Infrastructure Supplementary Planning Guidance document, alongside the strategic and local employment allocations of policies SP 14 and GN 9.
- 4.97 As with SP 14, Natural Resources Wales has advised that all Strategic Employment Sites at Withybush must connect to the public foul sewer. Environmental Permits for private drainage will not be issued here. It also advises that any Strategic Employment Sites which have a potential to impact on the Pembrokeshire Marine SAC will require HRA.

**SP 16 Retail Hierarchy**

The retail hierarchy for Pembrokeshire is

Sub Regional Town Centre	Haverfordwest
Town Centre	Pembroke Dock, Pembroke, Milford Haven, Fishguard, Narberth
Local Retail Centre	Goodwick, Neyland, Crymych, Letterston, Johnston, Kilgetty

All new retail and commercial development should be consistent in scale and nature with the size and character of the Centre and its role in the retail hierarchy and be compatible with any Strategic Regeneration Framework. New developments must maintain or enhance the vibrancy, vitality and attractiveness of that centre, supporting the delivery of appropriate comparison and convenience retail, office, leisure, entertainment, cultural and community facilities. New development proposals within retailing and commercial centres that provide retail, community or commercial floorspace on the ground floor will normally be supported. Opportunities will be sought to regenerate and improve the retail environment and improve access to, and within, retail and commercial centres by all modes of transport, prioritising walking, cycling (active travel) and public transport.

Proposals which would undermine the retail hierarchy or regeneration frameworks for town centres will not be permitted.

*Linked Key Issues: Tackling Rurality*

*This strategic policy will contribute towards achieving objectives: B,G,I*

*Well-being Goals: A Prosperous Wales, A More Equal Wales, A Wales of Cohesive Communities, A Wales of Vibrant Culture and Thriving Welsh Language.*

4.98 Policy SP16 promotes the Town and Local Centres as hubs of socio-economic activity and the focal points for a diverse range of services which support the needs of the communities they serve. They act as the most appropriate and sustainable locations for new retail, leisure and supporting commercial development. The co-location of facilities and services at such locations will help support their long-term health and vitality as convenient and attractive places to live, work, shop, socialise, study, access services for health and well-being and to conduct business. This approach will also encourage linked trips and a reduction in travel demand, recognising that they are more than the extent of designated retail areas. Major development must comply with the 'Town Centre First' policy contained within PPW and Future Wales, to help build resilient communities, and respond to the long-term impacts of Covid-19, which have not only re-focused the lives of people and communities, but acted as a further driver towards making centres multi-functional places.

- 4.99 In recognising that Town and Local Centres are moving away from their traditional retail roles, SP16, and its supporting policies, seeks to ensure they become the focus of a wider variety of services and facilities. The 'Town Centre First' approach is key to enabling such centres to increasingly become multi-functional places and community focal points, thereby rendering them more viable as go-to destinations. This will complement efforts to regenerate retail and commercial centres through the creation of more outside space, the re-use of underutilised areas, the start-up of remote co-working hubs, and the focus of more accessible public services.
- 4.100 Despite competition from out-of-centre retail developments, the established hierarchy has continued to evolve over many years. All existing retailing and commercial centres fulfil an important role in meeting residents' shopping and service needs plus their cultural and leisure requirements. SP16 therefore seeks to protect the established retail hierarchy of the area by focusing development in these centres and by only permitting out-of-centre retail development where a need and sequential test has been undertaken, in accordance with national policy, to protect the vitality, viability and attractiveness of retail centres.
- 4.101 This policy favours new development proposals in retail and commercial centres that offer retail, community and / or commercial floorspace at ground floor level. The provision of new, modern retailing and commercial floorspace within a centre can attract higher quality occupants, thereby increasing the vitality, attractiveness and overall viability of the retailing area. Equally, mixed uses, with, for example, residential provision above ground floors, are encouraged (see policy GN 31 Town Centre and Local Retail Centre Development).
- 4.102 SP16 seeks to ensure that, as far as possible, new development will be to the long-term benefit of existing commercial centres. Whilst recognising that the position of centres in the hierarchy may change over time, new development should be broadly in keeping with the character of the existing centre. Developers are expected to be flexible and innovative about the format, design and scale of proposed development, in order to achieve new development in harmony with existing centres.
- 4.103 SP16 recognises the traditional role and function of the established retail hierarchy in addition to the need for centres to progressively evolve into multi-functional, community focal points. The hierarchy will be used positively to ensure Town and Local centres continue to be the principal locations for new retail, office, leisure and community facilities. This will both capitalise on and enhance the vitality and viability of centres, whilst generating increased social and economic activity.
- 4.104 Retail and commercial proposals will be expected to reflect the level of hierarchy within which the proposal is located in both scale and nature. The hierarchy has been defined taking into account the role and function, scale, range of retail, commercial and other services and facilities and catchment.

- 4.105 Conservation Areas are designated at all Town Centres and maintaining and enhancing the individual character of towns must form an important element of any development proposal.
- 4.106 Haverfordwest is the County Town of Pembrokeshire and an important retail and service centre for a range of shopping, public and financial services, leisure and employment. Proposals within Haverfordwest should be compatible with the Haverfordwest Masterplan 'A Vision for the Future' and support the vitality and viability of the town centre.
- 4.107 Pembroke Dock and Pembroke town centres are to some extent complementary in their roles and function, with Pembroke Dock providing the main food shopping destination and Pembroke supported by tourist spend within the historic centre.
- 4.108 Milford Haven Town Centre has struggled to retain a strong mix of uses and primarily serves the needs of the local community. Whilst the town centre retains a role for non-food shopping, there is a need for redevelopment, particularly towards the western end of the town centre and consolidation of the town centre. The Marina has seen significant retail development and continues to thrive.
- 4.109 Fishguard Town Centre retains an important role as a food shopping destination for local residents and provides an important role for the wider rural area.
- 4.110 [4.109A](#) Narberth is a smaller town centre and fulfils a niche retail role for local residents and wider rural hinterland. Developments at the former primary school introduce a complementary range of uses including appropriate opportunities for residential, community, retail and commercial uses.
- 4.111 [4.109B](#) Local Retail Centres essentially provide for the day to day needs of the local community. Proposals at Local Retail Centres should not undermine or impact on the vitality or viability of Town Centres or their regeneration strategies, but should provide an appropriate level of service for these settlements and local rural catchment areas.

### SP 17 Visitor Economy

~~Tourism can be a catalyst for regeneration and p~~Proposals ~~for development~~ relating to the visitor economy and proposals will be supported provided that they are in an appropriate location, contribute to the diversity and quality of accommodation and attractions, and respect and protect the natural and built environment of their communities, including the linguistic heritage.

*Linked Key Issues: Living and Working, Resourceful Communities and Tackling Rurality, Protecting Our Environment*

*This strategic policy will contribute towards achieving objectives B, C, H and J.*

*Well-being Goals: A Prosperous Wales, A Resilient Wales, A Wales of Vibrant Culture and Thriving Welsh Language.*

- 4.110 Future Wales focuses on a resilient Wales, supporting and strengthening the foundational economy that is underpinned by the agriculture and tourism industries, and through the beauty of our natural environment. Pembrokeshire's natural and built environment has attracted visitors for many years, both to the National Park and further inland to the County's rivers, mountains, heritage and historic towns and villages. The visitor economy is a significant driver of the local economy and ~~can be catalyst for regeneration.~~ ~~and b~~Both the Welsh Government and Pembrokeshire County Council recognise this and encourage a positive approach to well-located, well designed, good quality tourism facilities, supporting agricultural diversification and the re-use of previously developed land and water-bodies.
- 4.111 A focus for the future is the provision of a strong and diverse year round industry, creating a high quality destination which visitors will want to revisit. A crucial feature of achieving this is ensuring that the aspect that draws visitors - the quality of the environment – is enhanced by any development that takes place. To ensure this is achieved proposals for visitor accommodation, attractions and leisure facilities, particularly those in the countryside, are required to be of high quality and to demonstrate that such a location is essential. In considering the acceptability of proposals, consideration will be given to location, siting, design and scale, access to the primary and core highway network and the impact of any resultant traffic generation. Access to public transport, walking and cycling are also important to consider. Proposals should reflect the character and appearance of the area with appropriate landscaping and screening utilised as required.
- 4.112 The General Policies of this LDP (GN 54 – GN 57) establish the locations that will be considered appropriate for different types of development and the criteria that proposals will be expected to meet in order to enhance the sustainability of Pembrokeshire as a visitor destination.

**SP 18 Non-Energy Minerals**

A contribution to the national, regional and local need for a continuous supply of minerals will be met by:

1. Maintaining a reserve of hard rock and sand and gravel throughout and at the end of the Plan period;
2. Safeguarding known resources of aggregates (including hard rock and sand and gravel) from permanent development, in locations outside settlement boundaries;
3. Safeguarding the landfall location for marine-dredged sand and gravel;
4. Creating buffer zones around existing mineral production sites to protect quarry operators and those occupying or using nearby land, including those with existing assets and infrastructure; and
5. Supporting the re-use and recycling of minerals.

*Linked Key Issues: Resourceful communities and Tackling Rurality.*

*This strategic policy will contribute towards achieving objectives B and D.*

*Well-being Goals: A Prosperous Wales, A Wales of Cohesive Communities*

4.113 This policy safeguards the economic non-energy mineral resource of the Plan area (hard rock and sand and gravel) and also a wharf for landing of marine-dredged sand and gravel, in accordance with national and regional policy, to ensure that the resource in Pembrokeshire is able to contribute to the national, regional and local demand for minerals. Existing non-energy mineral working sites within Pembrokeshire County Council's planning jurisdiction are listed in Appendix 3 of the LDP 2 Minerals Background Paper. Welsh planning policy no longer requires the safeguarding of the coal resource, which is in any case heavily fractured in Pembrokeshire and unlikely to be needed in the future, either to produce energy or to supply speciality industrial markets. The Welsh Government's Coal Policy Statement of March 2021 confirms their intention 'to bring to a managed end the extraction and use of coal'.

4.114 Minerals Technical Advice Note 1 on Aggregates (2004) requires minimum landbanks to be maintained throughout the Plan period (a 10-year supply of hard rock and a 7-year supply of sand and gravel). That means that at the end of the Plan period, in 2033, hard rock resources will be expected to be sufficient to last until 2043 and sand and gravel resources will be expected to be sufficient to last until 2040.

4.115 The Regional Technical Statement for Aggregates, 2<sup>nd</sup> Review, Appendix B, South Wales, September 2020, reached the following conclusions with regard to Pembrokeshire:

*The planning authority is required to make future provision for land-won primary aggregates within its Local Development Plan on the basis of the following annualised apportionments:*

- *Land won sand and gravel provision: Nil*
- *Crushed rock aggregates provision: 0.677 million tonnes per year until the end of the Plan period and for 10 years thereafter*

*The total apportionments for Pembrokeshire, as calculated in Tables 5.5 and 5.7 of the main document, over the 22-year horizon required for sand and gravel and the 25-year timescale required for crushed rock are zero for land-won sand and gravel and 16.932 million tonnes for crushed rock. These figures compare with existing landbanks (excluding dormant sites) of zero for sand and gravel and 16.72 million tonnes for crushed rock (as at 31<sup>st</sup> December 2016).*

*Given that Pembrokeshire currently has no sand and gravel operations, and that its permitted reserves of crushed rock are very close to the total apportionment required, no allocations for either are specifically required to be identified within the LDP at this time. However, consideration should be given to whether any of the factors set out in paragraph B84 above give rise to any other requirements for resource allocations.*

*In practice, given the close proximity of Pembrokeshire to the Pembrokeshire Coast National Park, as well as to Ceredigion, and the need to find new sources of sand and gravel outside the National Park, Pembrokeshire should continue to work in collaboration with those authorities in order to support the wider objective of maintaining adequate supplies within the West Wales sub-region as a whole. Subject to the circumstances and considerations set out in Annex A of the RTS Main Document, it may also need to collaborate with neighbouring Carmarthenshire. If necessary, the authority may need to increase its share of the combined sub-regional apportionment for sand and gravel, compared with the figures given above and in those circumstances might well need to identify new allocations. This does not apply to the apportionment for crushed rock. If such arrangements are made, they would need to be confirmed within a Statement of Sub-Regional Collaboration, produced in accordance with the guidance set out in Annex A, before any of the constituent LDPs are submitted for Examination.*

*Where allocations are required, these should, as far as possible, be identified as Specific Sites or, failing that, as Preferred Areas. If, as a last resort, it is only possible to identify broad Areas of Search, these should be sufficient to offer the potential of much greater quantities of reserves, in order to reflect the uncertainties involved.*

*Given the availability of unworked crushed rock and sand and gravel in Pembrokeshire, and the longer-term ambition to reduce quarrying activity within the National Park, there would be merit in identifying new Areas of Search (even*

*if specific allocations are not required) in order to encourage future interest from mineral operators.*

- 4.116 The information in the LDP 2 Minerals Background Paper indicates that the landbank for hard rock is plentiful, with every prospect that a generous landbank will remain at the end of the Plan period. Publication of the Regional Technical Statement for Aggregates, Appendix B, South Wales, September 2020, slightly amends that conclusion, as recorded above, but does not require LDP allocations to be made. Further consenting of crushed rock proposals since the RTS 2<sup>nd</sup> Review was published has to a large extent ensured that the crushed rock requirement of the Plan period can be met, along with an additional 10 years thereafter.
- 4.117 The terrestrial sand and gravel landbank and the apportionment of provision to meet future needs is now considered on a sub-regional basis in West Wales. There are current sand and gravel production sites in the Pembrokeshire Coast National Park, further sites and allocations in Ceredigion and some small-scale production in Carmarthenshire. However, the regional landbank for sand and gravel is rather limited in comparison with that available for hard rock. National Park sand and gravel production at the two current production sites will eventually cease and production and allocation sites elsewhere in the region are of limited capacity. New terrestrial production sites within the region but outside the National Park are therefore needed.
- 4.118 An allocation for a sand and gravel quarry is made within this Local Development Plan (see Policy GN 37) which will contribute towards meeting this sub-regional need.
- 4.119 As noted above, the RTS 2<sup>nd</sup> Review says that PCC should work collaboratively with its neighbouring Local Planning Authorities in Ceredigion, the Pembrokeshire Coast National Park and Carmarthenshire, to ensure that there are adequate future supplies of sand and gravel in the West Wales sub-region. This is being taken forward through a jointly prepared Statement of Sub-Regional Collaboration for the West Wales sub-area, as defined by the RTS 2<sup>nd</sup> Review. In addition to the sand and gravel allocation of policy GN 37, PCC is therefore identifying Areas of Search for sand and gravel elsewhere in the County, in particular in North Pembrokeshire and East Pembrokeshire. These areas with resource potential extend into South Ceredigion and West Carmarthenshire respectively, although in these cases it will be for the respective Local Planning Authorities to incorporate those Areas of Search into their replacement LDPs at the appropriate time. In accordance with the aspiration to eventually conclude minerals production in the Pembrokeshire Coast National Park, no Areas of Search are being identified in the part of Pembrokeshire covered by that designation.
- 4.120 Some of the sand and gravel resources coming into SW Wales are marine-won. There is a sand and gravel wharf at Pembroke Dock where these supplies are landed and this is safeguarded by the Plan. The source of the material is in the outer Bristol Channel. The RTS 2<sup>nd</sup> Review notes that, in relation to sand

and gravel, as current permitted reserves at land-based sites in West Wales are depleted, marine aggregates may need to provide a greater contribution in future years. However, for the time being, Pembrokeshire County Council is asked to retain adequate supplies of sand and gravel from terrestrial sources. Also, marine sand and gravel cannot always substitute for terrestrial materials.

- 4.121 There is a requirement to protect existing quarry sites from incompatible uses on nearby land, ensuring that developments that might be adversely affected by a quarrying operation are located outside a defined buffer zone. Likewise, quarry buffer zones can ensure that nearby uses are not adversely affected by quarry extension proposals. Any assessment of viability for new or extension minerals sites should include information regarding existing assets and infrastructure within the site and the quarry buffer zone. The buffer zone distances are set out in Welsh Government guidance and there is an acceptance that where these encroach on an existing built-up area, exceptions may need to be made. The quarry buffer zones shown on the LDP 2 Proposals Map reflect consenting since LDP 1 was prepared.
- 4.122 Re-use of secondary aggregates is desirable, but the largest potential sources of such material are likely to be major industrial sites outside Pembrokeshire.
- 4.123 Proposals for the re-use and recycling of minerals will be supported, where these are in accord with environmental objectives. Secondary aggregates can supplement supplies from primary sources. However, the main potential sources of secondary aggregate supply in Wales are not in Pembrokeshire.
- 4.124 On dormant sites, there is now a requirement to assess the likelihood of each such site being worked in the Plan period, subject to the completion of an initial review of planning conditions and submission of an Environmental Impact Statement. Where a likelihood of re-commencement is the conclusion, production from the site in question can be offset against the need for future allocations. The RTS 2<sup>nd</sup> Review notes that there is a dormant igneous quarry in Pembrokeshire and asks the Local Planning Authority to assess the likelihood of the site being worked in the Plan period. The Council has concluded that this is unlikely and hence the permitted reserves at this site are not offset against the requirements for future working.

**SP 19 Welsh Language**

Proposals that safeguard and support the retention and enhancement of the Welsh language and Welsh language communities will be encouraged.

Within areas of Welsh language sensitivity, as shown on the Proposals Map, a Welsh Language Impact Assessment setting out how the proposed development will protect, promote and enhance the Welsh language will be required for the following developments:

Windfall residential development of 5 or more dwellings;

Retail, commercial or industrial developments with a total floorspace of 1,000 sqm or more or a site area measuring more than 1 hectare.

Proposals which would have an unacceptable impact on the vitality and viability of the Welsh language and culture will not be permitted, unless the impact can be appropriately mitigated.

Development will be managed sensitively in areas where the Welsh language has a significant role in the local community. This may include the location, phasing, signage and other appropriate mitigation measures, as well as identifying measures that enhance the interests of the Welsh Language and culture.

*Linked Key Issues: Resourceful Communities*

*This strategic policy will contribute towards achieving objectives: B, C, F.*

*Well-being Goals: A Wales of Cohesive Communities, A Wales of Vibrant Culture and Thriving Welsh Language*

4.125 An important part of what makes Pembrokeshire special to both residents and visitors is its historic and linguistic culture. This policy aims to support this diverse culture, encouraging appropriate new development in language sensitive locations to ensure local communities remain sustainable and vibrant for future generations.

4.126 Cymraeg 2050 is the Welsh Ministers' strategy for the promotion and facilitation of the Welsh language. It sets out the Welsh Government's long-term approach to achieving the vision of a thriving Welsh language and a million Welsh speakers by 2050. Three strategic themes are identified to help achieve this vision.

1. Increasing the number of Welsh speakers
2. Increasing the use of Welsh
3. Creating favourable conditions – infrastructure and context.

4.127 The strategy aims to provide favourable conditions for learning and using Welsh and recognises the role of the land use planning system in contributing to the vitality of the Welsh language by creating suitable conditions for thriving, sustainable communities. This can include supporting the socio-economic

infrastructure of Welsh speaking communities, supporting a thriving sustainable local economy in rural areas, and ensuring decisions regarding the type, scale and location of development within a specific community do not have a detrimental impact on the Welsh language.

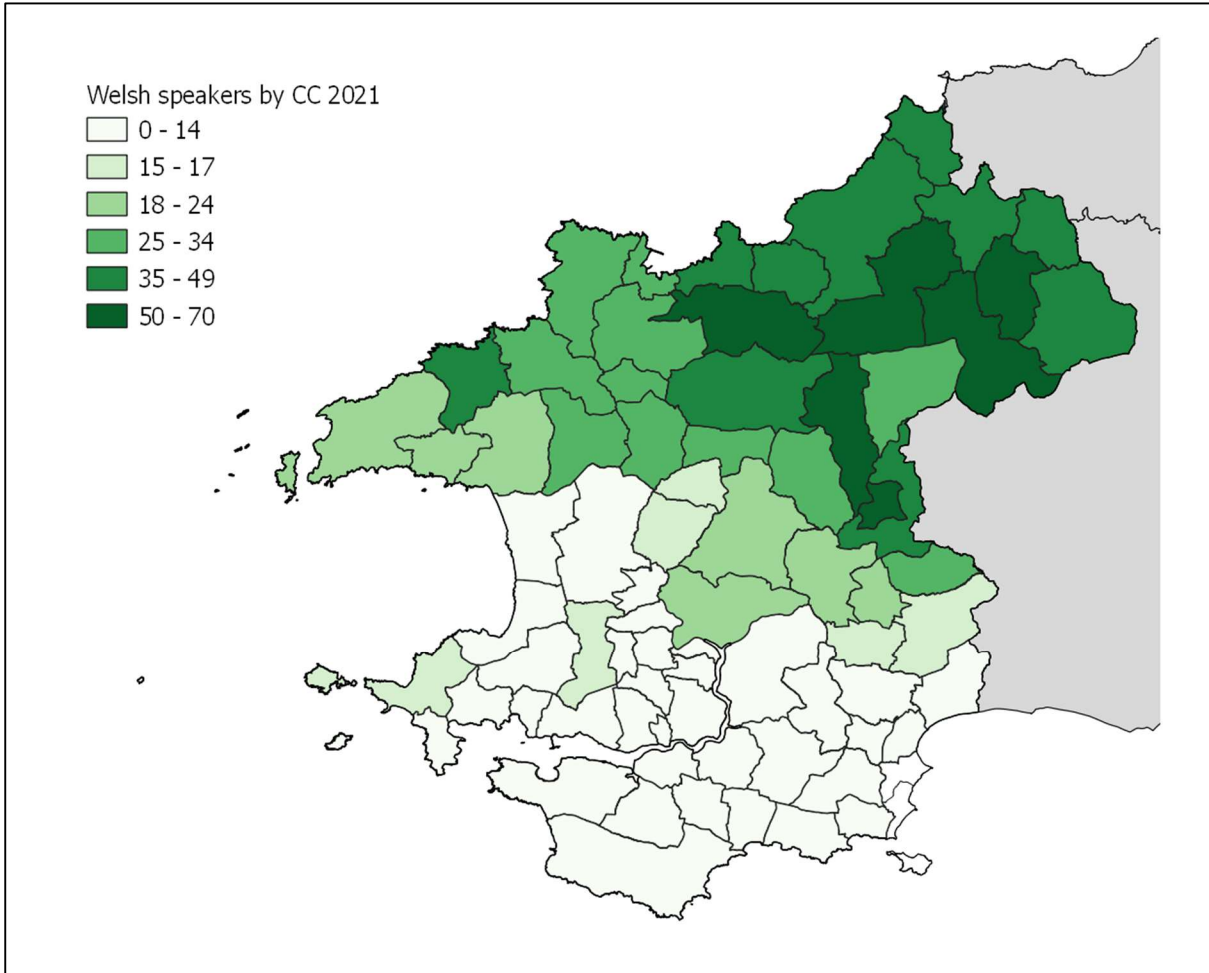
- 4.128 Across the County 17.2% of the population were Welsh speakers at the time of the census in 2021, the Welsh average at the same date being 17.8%. When comparing the County average of Welsh speakers across recent censuses it is predominantly declining, with the figure having been 19.2% in 2011, 21.8% in 2001<sup>23</sup> and 18.3% in 1991.
- 4.129 There has historically been considerable geographic variation in the incidence of Welsh speakers in Pembrokeshire, with a very low proportion in the south of the County and a much higher prevalence of Welsh speakers in the north of the County. However, the pattern is thought to be changing, in part because of more widespread use of the Welsh language in Pembrokeshire's schools. Welsh language use can also vary by settlement within the same community council area, and relatively small changes to the number of Welsh speakers within a settlement can impact on the day-to-day use of the language.
- 4.130 This policy emphasises the need to safeguard, support and enhance the cultural and linguistic profile of those local communities where the Welsh language has a significant role, and will apply in communities where more than 18% of the population is Welsh speaking (2021 census). Figure 2 below identifies appropriate community council areas where Welsh language speakers are 18% or more of the population to reflect the vulnerability of the language in these areas.
- 4.131 A Sustainability Appraisal has been undertaken of the Plan, to assess the likely effects of the LDP strategy, policies and allocations on the use of the Welsh language. This policy should be read in conjunction with TAN 20 'Planning and the Welsh Language' October 2017 and the Council's Development Sites and Infrastructure SPG, which identifies appropriate mitigation measures for plan allocations within language sensitive areas.
- 4.132 A Welsh Language Impact Assessment will be required from developers for large windfall residential developments, which are unanticipated developments, not allocated, for 5 or more residential dwellings. Retail, commercial or industrial developments with a total floorspace of 1,000 sq. metres or more or a site area measuring more than 1 hectare will also require a Welsh Language Impact Assessment. The Welsh Language Impact Assessment should set out mitigation measures which could include; timing of development, phasing, provision of affordable housing, signage, any proposed positive contributions, and section 106 contributions to support Welsh Language communities.

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<sup>23</sup> <https://statswales.gov.wales/Catalogue/Welsh-Language/WelshSpeakers-by-LA-BroaderAge-2001And2011Census>

4.133 The monitoring of LDP policies in the Annual Monitoring Report (AMR) will include an indicator to monitor the number of large windfall applications approved within Welsh language sensitive areas, to assess whether such applications have been supported by a Welsh Language Impact Assessment.

Figure 2: Incidence of Welsh Speakers by Community Council (2021 Census)



**SP 20 Transport Infrastructure and Accessibility**

Improvements to the existing transport infrastructure that will increase accessibility to employment, services and facilities, particularly by sustainable means, will be supported.

Routes for identified improvements to transport infrastructure are safeguarded, with the details of safeguarding presented in policy GN 36 Transport Routes and Improvements.

Pedestrian and cycleway schemes coming forward in conjunction with the Active Travel (Wales) Act, 2013, will be supported.

*Linked key issues: Resourceful communities and Tackling Rurality*

*This strategic policy will contribute towards achieving objective 1.*

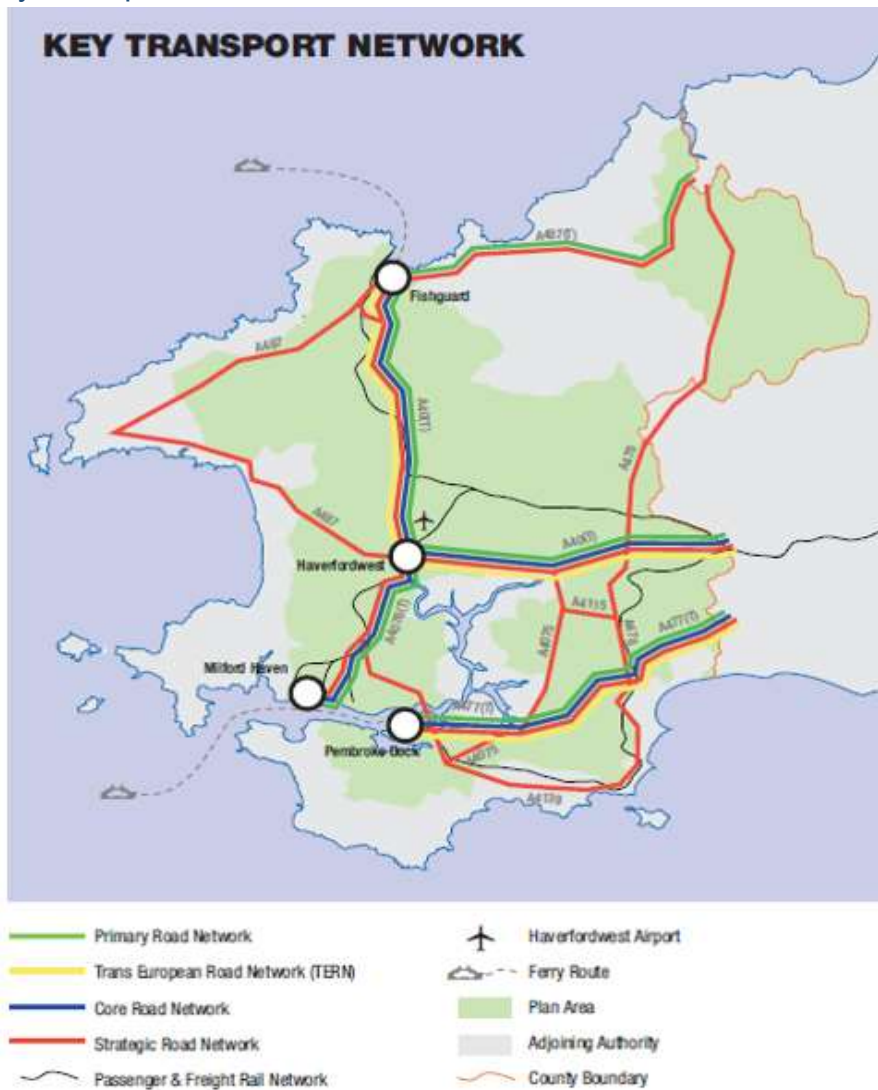
*Well-being Goals: A Prosperous Wales, A Wales of Cohesive Communities, A Globally Responsible Wales*

4.134 Local Development Plans provide a means of integrating land use and transportation planning. This policy, in conjunction with general policies such as GN 36 (Transport Routes and Improvements) and GN 2 (Sustainable Design) provide a basis for an integrated approach to land use and transportation planning. Increasingly, the focus for transport planning and investment is on travel by sustainable means. Within this Plan area, critical aspects of the context for transport planning are that Pembrokeshire is on important strategic road and rail networks that link Wales with ferry services to and from Ireland and also that the County is a location of national importance for port and energy-related economic activities. In accordance with Planning Policy Wales Edition 12 and Technical Advice Note (Wales) 18, this policy identifies and safeguards proposed improvements to transport infrastructure that will support sustainable economic growth. Further detail on safeguarding of transport schemes are presented in policy GN 36, while policy GN 2 makes reference to installation of charging points for Ultra Low Emission Vehicles. The improvements identified in the Plan and on the Proposals Map are programmed and funded and are likely to take place in the Plan period. These include improvements identified in the Joint Local Transport Plan for South West Wales (2015-2020) (prepared jointly by Pembrokeshire County Council, City and County of Swansea, Neath-Port Talbot County Borough Council and Carmarthenshire County Council) 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.

4.135 The Active Travel (Wales) Act, 2013, came into force in 2014. It requires the mapping of current and aspirational walking and cycling routes across Wales. The Council strongly supports the principles that underpin active travel, as this provides a basis for travel by sustainable means. Many new pedestrian and

cycle routes have and will continue to come forward in consequence of this Act and the Council will support such schemes where consistent with other LDP policies.

Figure 3: Key Transport Network



**SP 21 Waste Prevention and Management**

Appropriate provision for waste management or disposal facilities will be made within the Plan area.

In the first instance the Plan will seek to prevent the creation of waste. Where prevention is not possible, the impact on the environment will be minimised and the use of waste as a resource maximised, through reuse, recycling and other recovery. Only in cases where no better alternative is available will disposal be considered, in that instance by the most sustainable means possible.

*Linked Key Issue: Protecting Our Environment.*

*This strategic policy will contribute towards achieving objective K.*

*Well-being Goals: A Prosperous Wales, A Globally Responsible Wales.*

- 4.136 The European Waste Framework Directive and Landfill Directive provide the basis for waste prevention and management in Wales. The provisions of these two directives are reflected in the Welsh Government strategy for waste, 'Towards Zero Waste – One Wales, One Planet' (TZW). The latter document 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'. TZW and the Sector Plans provide a framework within Wales to reduce the amount of waste produced and to promote high levels of recycling.
- 4.137 Welsh Government planning policy on waste is set out in Planning Policy Wales Edition 12 (PPW) and in Technical Advice Note 21 on Waste (TAN 21). The emphasis is on preventing waste from arising in the first place and where this is not possible on reclaiming the waste materials to allow their re-use where feasible. Minimisation of adverse environmental impacts, avoiding risk to human health, protecting designated landscapes and nature conservation sites and protecting the amenity of local residents are important considerations.
- 4.138 A Waste Background Paper has been prepared to support the LDP 2 waste policies and proposals.
- 4.139 The approach taken to waste management in the Council's planning area is based on the higher-level policy documents. Key aspects are:
- Seeking to prevent waste being produced in the first place;
  - Ensuring that waste management reflects the Waste Hierarchy;
  - Ensuring that the proximity principle is reflected in decisions on waste management proposals coming forward in the Council's planning area;
  - Identifying sites that might potentially be suitable for new waste management facilities (both in-building and open air);

- Setting out the criteria for consideration of all waste applications, including those coming forward on allocated / identified and unallocated sites;
- Minimising of environmental, transport network, public health, local amenity and landscape impacts of waste management activities;
- Making the best possible use of waste resources; and
- Ensuring that where disposal to land is the only possible option, there is sufficient void space available and acceptable standards are reached in terms of environmental, transport, public health, local amenity and landscape impacts.

4.140 The strategic policy sets the framework for the points referenced above and general policies elaborate on specific elements.

## 5. AREA WIDE POLICIES

### PLACE-MAKING

#### GN 1 General Development Policy

Development will be permitted where the following criteria are met:

1. The nature, location, siting and scale of the proposed development is compatible with the ~~capacity and~~ character of the site and the area within which it is located;

2A. It would not result in a significant detrimental impact on local amenity in terms of visual impact, loss of light or privacy;

2B. It would not cause an unacceptable adverse impact on local amenity that cannot be mitigated, in terms of light, odours, smoke, fumes, dust, air quality or an increase in noise or vibration levels;

3. It would not cause an unacceptable adverse effect (a harmful impact that cannot be satisfactorily mitigated) on landscape character, quality or diversity, including the special qualities of the Pembrokeshire Coast National Park and neighbouring authorities;

4. It would not cause an unacceptable adverse effect (a harmful impact that cannot be satisfactorily mitigated) on soils, ~~and for u~~Unallocated sites of 1 hectare or more outside Settlement Boundaries is and when a site contains predicted grades of Best and Most Versatile agricultural land it must be accompanied by an agricultural land classification survey where the Welsh Government's Predictive ALC map indicates that the land is partly or wholly in Grades 1, 2 or 3a\* new footnote;

5. It respects and protects the natural environment with no unacceptable adverse effects (a harmful impact that cannot be satisfactorily mitigated) on the environment including protected sites, habitats and species;

6. Where possible ~~it~~ it would take place in an accessible location, would incorporate sustainable transport and accessibility principles and would not result in a detrimental impact ~~an unacceptable adverse effect (a harmful impact that cannot be satisfactorily mitigated)~~ on highway safety or in traffic exceeding the capacity of the highway network and would include if necessary make provision for improvements to level crossing(s) where a material increase in the use of crossing(s) is likely to arise;

7. Necessary and appropriate service infrastructure, access and parking can be provided;

8. It would not cause or result in ~~unacceptable harm to an unacceptable adverse effect (a harmful impact that cannot be satisfactorily mitigated)~~ to health and safety, including through flood risk ~~and/or~~ land instability;

9. It would not ~~cause an unacceptable adverse effect (a harmful impact that cannot be satisfactorily mitigated)~~ have a significant adverse impact on water quality (see also policy GN 47);

\*new footnote: New Footnote: Predicted grading based on Predictive ALC map available from Data Map Wales [https://datamap.gov.wales/layers/inspire-wg:wq\\_predictive\\_alc2](https://datamap.gov.wales/layers/inspire-wg:wq_predictive_alc2)

~~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; 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;~~

11. It minimises the generation of waste during implementation and manages any waste generated; and

12. It neither contributes to the coalescence of distinct settlements nor creates or consolidates ribbon development.

5.1 The purpose of this policy is to provide a framework for evaluation of potential development impacts. This will be used in conjunction with other plan policies to determine whether the proposed development is appropriate.

5.2 The policy will operate as a mechanism to ensure that development is appropriate for the immediate location in which it is proposed and its wider setting/context. Proposals must respect the capacity of individual settlements to accommodate growth in terms of both scale and rate of development, and in relation to the settlement's position within the hierarchy. In the countryside proposals must demonstrate that such a location is necessary for the development and that the nature of the proposal is appropriate within a rural area. The scale, nature and siting of a proposal must be appropriate to the location proposed and must not undermine the character of either the site or the locality.

5.3 The amenity enjoyed by people in their homes, workspaces and recreational areas will be protected from harmful, inappropriate development. Amenity is defined as those elements in the appearance and layout of settlements and the countryside which make for a pleasant life.

5.4 Pembrokeshire's natural and built environment will be protected from inappropriate development and, where possible, enhanced. Various designations, including nature designations, geological and geomorphological designations, Town and Village Greens, Common Land and Green Wedges contribute to conserving the character of Pembrokeshire's green spaces and their surrounding environs. Furthermore, the Plan area has many attractive functional landscapes which are dependent on sound land management and

conservation practices and has a close physical and functional interrelationship with the neighbouring Pembrokeshire Coast National Park. Any development proposal must therefore demonstrate that it respects the natural environment, the landscape character, coherence and integrity, native species, soils, and ground and surface waters. Sensitive landscaping and planting, and the creation, maintenance and management of landscape features important to wildlife will be encouraged. Where a development proposal would result in the loss of a local landscape feature it must demonstrate that this would be outweighed by its positive impact on the overall character of the area. Where development is proposed on [predicted best and most versatile agricultural land \(that in grades 1, 2 and 3a\)](#)<sup>23a</sup> ~~an unallocated site of 1 hectare or more outside Settlement Boundaries~~, it must be accompanied by an agricultural land classification survey. The potential impact of the proposal on the best and most versatile agricultural land ~~(that in grades 1, 2 and 3a)~~ will be a material consideration in the evaluation of the proposal.

5.5 Urban and rural woodland, tree cover and hedgerows contribute to the visual quality and diversity of the landscape, to recreational and educational opportunities and to substantive environmental benefits such as additional or enhanced priority habitats and feeding grounds, shelter, shade, improved carbon capture, ameliorating microclimates and improving air quality. Development proposals should utilise the natural features of a site and where trees, woodland and hedgerows are present, their retention should be identified within planning applications. Development that would impact upon trees, woodland and/or hedgerows will require an arboriculture survey and should retain and adequately protect these features prior to, during and after development. Permanent removal of trees, woodland and hedgerows will only be permitted where it would achieve significant and clearly defined public benefits. Prospective developers of schemes that may impact upon Ancient or Semi-Natural Woodland should consult the Ancient Woodland Inventory<sup>24</sup> prior to any disturbance of a site. Pembrokeshire has a full set of quality assured LANDMAP layers which evaluate the visual and sensory landscape, cultural landscape, landscape habitats, the geological landscape, and the historic landscape. These layers have been used to inform the Authority's Landscape Character Assessment which is part of the evidence base for this plan. Following public consultation, the Landscape Character Assessment will be adopted as Supplementary Planning Guidance. Along with national planning policy, applicants are encouraged to use this information to inform their proposals as it will be a material consideration and be used in development decision making.

5.6 Soils are an important resource in the plan area, underpinning successful agriculture, supporting a diversity of plant and animal species and habitats, and they can act as an important store for carbon, particularly those with a high

<sup>23a</sup> [Predicted grading based on Predictive ALC map available from Data Map Wales](https://datamap.gov.wales/layers/inspire-wg:wg_predictive_alc2)  
[https://datamap.gov.wales/layers/inspire-wg:wg\\_predictive\\_alc2](https://datamap.gov.wales/layers/inspire-wg:wg_predictive_alc2)

<sup>24</sup> <https://naturalresources.wales/evidence-and-data/research-and-reports/ancient-woodland-inventory/?lang=en>

peat<sup>25</sup> content. Soils may also make a positive contribution to land stability. Agricultural land of grades 1, 2 and 3A of the Agricultural Land Classification system is the best and most versatile and Welsh planning policy (Future Wales and PPW edition 12, paragraph 3.58) protects this as a finite resource for present and future generations. This plan gives considerable weight to the protection of the best and most versatile agricultural land and wherever possible protects it from development. Land in grades 1, 2 and 3A should only be developed where there is overriding need for the development and a) previously developed land or land of a lower agricultural grade is not available or b) where lower grade land is available, but has a high environmental value, recognised by a designation for landscape, wildlife, historic or archaeological purposes. Where there is no alternative to development of best and most versatile agricultural land, the development should be directed to the lowest graded land that is available (in other words, in the sequence grade 3A, then grade 2 and finally if there is no alternative to grade 1).

- 5.7 Developments must be of a scale which the adjacent road network has the capacity to serve, without detriment to the highway network or the environmental characteristics of the road. Where necessary developers will fund improvements which are required to make development proposals acceptable. All new development should be highly accessible by walking, cycling or public transport although settlement dispersal means that access by car will continue to play an important role in many parts of Pembrokeshire. Walking and cycling have an important role, particularly within settlements, to reduce the number of short trips taken by car. Developers will be required to give careful consideration to location, design and access arrangements. Transport Assessments will be required for proposals likely to generate significant additional journeys, to demonstrate that sustainable transport and accessibility principles have been built into the development, including provision of cycle parking and 'set-down' areas for buses. SPG setting out Parking Guidelines will advise on appropriate levels of provision for various types of development in different locations depending on existing service provision. This item of SPG will also set out requirements for provision of charging points for ultra low emission vehicles (ULEVs), as referenced in policy GN 2 Sustainable Design and Placemaking. [Where a material increase in the use of level crossings is likely to arise as a consequence of a development proposal, Network Rail will be consulted and if necessary assessments will be sought from the developer and improvements will be required to be provided in conjunction with the development.](#)

- 5.8 Service Infrastructure includes parking, power supplies, water, means of sewage disposal, surface water disposal and telecommunications. In some instances it may be necessary for a developer to contribute to the cost of increasing service infrastructure in an area where there is a shortage.

<sup>25</sup> For further detail on the location of ~~important~~ peatland in Pembrokeshire see <https://smnr-nrw.hub.arcgis.com/apps/d18ef8c74ecc4dc4a0cbf71ab6935ba0/explorehttp://lle.gov.wales/catalogue/item/UnifiedPeat/?lang=en> and also LDP2 Biodiversity SPG.

- 5.9 Where there are concerns that a proposal would cause harm to health and safety through contamination, adverse impact on air quality, land instability, flooding or erosion, professional advice will be sought from the relevant authority. Where such concerns relate to fluvial or coastal flooding and / or erosion, the provisions of the relevant Shoreline Management Plan and / or Catchment Flood Management Plan and the Flood Map for Planning published by NRW will inform consideration of the health and safety issues. In some instances, anticipated on-site or off-site problems may render development inappropriate; in other cases, development may be possible if mitigation is available, to make the proposal resilient to the identified problems. No housing allocations have been identified within [G4 Zone 2](#) or [G2 Zone 3](#) flood zones in the Plan. A small number of other allocations are located within [G4 Zone 2](#) or [G2 Zone 3](#) flood zones. Where allocations are at risk of fluvial or surface water flooding, this is identified within the Development Sites and Infrastructure SPG, with requirements establishing the level of information to be provided at application stage.
- 5.10 Decisions on proposals made within the safeguarding zone of an existing installation or for new hazardous installation(s) (including airfields) will be informed by guidance from the relevant safeguarding bodies on the health and safety implications of the proposal, including compatibility with adjacent and nearby land uses and the implications for approach routes in the vicinity. A separate advisory note will be prepared on which hazardous installations have safeguarding zones and how further information relating to these zones can be obtained.
- 5.11 There is further detail on policy requirements relating to water quality in policy GN 47 Water Quality and Protection of Water Courses. This is a reflection in particular of the raised awareness of river catchment pollution issues relating to nutrients, including phosphates and nitrates, which affects the rivers protected by SAC designations in Pembrokeshire, the Afon Teifi and the Afon Cleddau. There is new guidance from Natural Resources Wales on phosphates in the non-tidal parts of the SAC rivers in Wales and it has been found that the levels of phosphates in the non-tidal parts of both the Teifi and Cleddau catchments are too high. It is anticipated that further guidance from Natural Resources Wales, but relating to the tidal parts of the SAC rivers in Wales (including the Teifi and Cleddau) will be issued in the future.
- 5.12 With reference to sustainable drainage, new developments of more than one dwelling, or where the area covered by construction work equals or exceeds 100 square metres, require approval from the SuDS Approving Body (SAB) – which in Pembrokeshire is the County Council. Construction cannot commence until SuDS approval from the SAB is in place – even if planning permission has been granted.
- 5.13 Planning Policy Wales, edition 12, advises that the provision of SuDS should form an integral part of the design of new development and should be an early stage task in putting together development proposals.

- 5.14 For Development Planning purposes, PPW edition 12 advocates collaborative approaches to sustainable drainage, drawing on evidence obtained through green infrastructure assessments, with a view to integrating SuDS into growth strategies for particular areas. The provisions of this Plan, in combination with the SuDS schemes approved by the SAB, will help to deliver that aspiration.
- 5.15 When providing SuDS, it may sometimes be necessary to use hard infrastructure solutions, for instance where there are important archaeological considerations. However, in most cases, nature-based solutions are the preferred option. Where ground conditions preclude the use of SuDS, for instance where glacial tills are present, the next best available solution to site drainage will be sought.
- ~~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~~, and where proposals have a significant impact they must include a full lighting scheme and mitigation proposals. Lighting can adversely affect a sense of place, with cumulative impacts affecting landscape settings. Guidance notes on appropriate levels of 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.~~
- 5.17 Waste minimisation and keeping resources in use for as long as possible are important elements of the circular economy (see PPW edition 12, paragraph 5.11.2 for further details). The best way to ensure that a development proposal meets these requirements is through submission of a Natural Resources Management Plan for the development. These are best prepared at an early stage in the development process and can avoid problems later on and reduce costs for developers. Matters to consider with regard to natural resource management are the layout and design of the development, use of materials in construction and re-use and re-cycling of any waste generated during construction, including any waste generated through demolition or re-configuration of site levels.
- 5.18 Part of protecting Pembrokeshire's distinctiveness, both in terms of landscape and culture involves protecting the distinctive nature of its settlements. Therefore proposals which would contribute to the coalescence of settlements or to ribbon development which encroaches into the countryside will not be permitted.

## GN 2 Sustainable Design and Placemaking

Development will be permitted where relevant criteria are met:

- 1.It is of a good design which pays due regard to local distinctiveness and contributes positively to the local context;
- 2.It is appropriate to the local character and landscape/townscape context in terms of layout, scale, form, siting, massing, height, density, mix, detailing, use of materials, landscaping and access arrangements / layout;
- 3.It incorporates a resource efficient and climate responsive design that embeds circular economy principles, where possible through location, orientation, density, layout, land use, local and sustainable construction materials where they are available and their use is economically viable and environmentally acceptable, water conservation and the use of sustainable drainage systems (SuDS);
4. It provides adequate facilities and space for the collection and recycling of waste materials;
- 5.It achieves a flexible and adaptable design;
- 6.It creates an inclusive and accessible environment for users that addresses community safety and encourages walking and cycling;
- 7.It provides a good quality, vibrant public realm that integrates well with adjoining streets and spaces;
- 8.It contributes to delivering well-designed outdoor space with good linkages to adjoining streets, spaces and other green infrastructure; ~~and~~
9. It makes provision for ultra-low emission vehicle charging points where new residential development is proposed, or in appropriate circumstances on commercial developments.
10. It respects existing site constraints including utilities situated within sites.

5.19 Delivering sustainable development underpins the planning system in Wales. As part of the overall sustainable development agenda for Wales and for Pembrokeshire this policy seeks to deliver more sustainable buildings and places by ensuring that all new development is designed and constructed to meet all relevant policy criteria and with low maintenance implications. As well as being of significant importance for all new buildings, the policy criteria will also apply to alterations and extensions to existing buildings. For small scale proposals policy criteria considerations will be proportionate to the type of development proposed.

5.20 Good design is reliant on proposals emerging from an understanding of the site and its context, rather than relying on the unimaginative use of standard site layouts and building types. This policy aims to raise the standard of design for all new development across the County in order to create attractive and functional buildings and spaces and to improve areas of poor design and layout.

- 5.21 The natural and built environment of Pembrokeshire contributes significantly to the quality of life for both residents of, and visitors to, the area. The Wales Spatial Plan seeks to reverse a trend for Wales to become more uniform with standard building types often failing to reflect traditional local building styles, through the promotion of local distinctiveness. Different design characteristics exist in different areas of the County therefore it is important that developers adopt a design led approach that ensures all new development responds positively to the characteristics of the site and its surroundings. This policy aims to ensure that all new development makes a positive contribution to the local character and distinctiveness of the built and natural environment and the communities within Pembrokeshire. Where no strong local characteristics exist then good, contemporary, sustainable design will be appropriate.
- 5.22 As acknowledged in Planning Policy Wales (Edition 12), place-making and design goes beyond traditional aesthetic considerations and concerns the relationship between all elements of the natural and built environment. This policy promotes a more considered approach to the design of buildings in Pembrokeshire rather than a uniform design solution for all areas and encourages the use of appropriate aspects of local design traditions and characteristics to produce contemporary buildings.
- 5.23 Climate change is a key long- term environmental challenge and the need to reduce emissions and use resources more efficiently is essential. Developers will be required to address energy efficient and climate responsive design at an early stage in the design process through sustainable densities and patterns of development and the incorporation of sustainable building design. Consideration should be given to location, layout, orientation, density, land use, materials, construction techniques, landscaping, water conservation and waste management solutions. New development proposals will be expected to accommodate, where appropriate, the use of recycled construction materials, including secondary aggregates. The introduction of the Sustainable Drainage Scheme (SuDS) consenting regime in early 2019 will make the inclusion of SuDS in all development of over 100m<sup>2</sup> or for 2 or more dwellings mandatory. Early consideration to the design layout requirement for SUDS should be given.
- Where planning applications require phosphate and/or nitrogen mitigation design details for onsite SuDS being used as phosphate and/or nitrogen mitigation must be reviewed, confirmed and secured prior to the determination of the application. (see also Policy SP 12a (formerly Policy GN 47). The application must include details for maintenance and monitoring to demonstrate how SuDS features will be maintained in perpetuity. This information needs to be specific to the use of SuDS in reducing P and N runoff, separate to the normal requirements for flood risk.
- 5.24 Space should be provided for waste management and storage, in particular to facilitate the kerbside sorting of local authority collected waste.

- 5.25 Planning Policy Wales edition 12 requires the installation of ULEV charging points in conjunction with car parking provision in non-residential development proposals. For non-residential proposals, the minimum requirement advised by PPW is that 10% of the car parking spaces provided have such charging points. Further details on this topic will be incorporated into the Parking Guidelines Supplementary Planning Guidance that will be prepared to support this Plan. In addition to the PPW 12 requirement however, this Plan seeks to ensure that all new residential development provides ultra-low emission vehicular charging points in accordance with the Parking Guidelines SPG. This provision seeks to future-proof new housing and is part of PCC's corporate commitment to tackling the climate change emergency.
- 5.26 Designs will need to incorporate responses to the likely impact of climate change in relation to increased temperatures via natural shading, cooling and ventilation and the implications of storms and flooding. Buildings and related infrastructure should be designed to be flexible not only to climatic change but also to accommodate a variety of uses and changing needs over their lifetime.
- 5.27 The public realm should be considered as an integral element of the design process. Development proposals should be designed, constructed and maintained to create a good quality, accessible and vibrant public realm that relates well to adjoining streets and spaces. Proposals should integrate into existing movement networks, maximising connectivity, whilst providing a sense of continuity and enclosure to support the creation of locally distinctive and legible streets and spaces.
- 5.28 The principle of inclusive design should be applied to all new development in order to create accessible environments for all users that encourage walking, cycling and the use of public transport. Proposals should encourage streets and spaces as multi-functional places with the pedestrian taking priority, as advised in the 'Manual for Streets'.
- 5.29 Developers will be required to improve community safety through the design of new development, by introducing appropriate security measures and enabling communities to foster a sense of ownership and responsibility for local space. This will, in turn, make communities more desirable places to live and visit.

### GN 3 Infrastructure and New Development

Where development generates a directly related need for new or improved infrastructure, services or community facilities and this is not already programmed by a service or infrastructure company, then this must be funded by the development, and:

1. Related in scale and kind to the development; and
2. Provided on site wherever appropriate. In exceptional circumstances contributions may be made to the provision of facilities elsewhere, provided their location can adequately service the development. The timely provision of directly related infrastructure, services and community facilities shall be secured by planning condition(s), the seeking of planning obligation(s) by negotiation, and/or by any other agreement or undertaking.

The viability of a development will be a key consideration when securing planning obligations and dispensation may be allowed in certain circumstances where there is clear evidence that the development would not be viable.

Measures necessary to physically deliver a development and ensure that it is acceptable in planning terms will be required in the first instance. Where appropriate contributions may be sought for a range of purposes, including:

1. Affordable housing
2. Green Infrastructure, Recreational and Amenity Open Space
3. Sustainable Transport Facilities
4. Education
5. Community and Cultural Facilities, including libraries, and community halls
6. Regeneration
7. Waste
8. Renewable and low carbon energy
9. Biodiversity
10. Broadband
11. Water (including water quality), Waste Water Treatment and Sewerage Infrastructure

In the event that viability considerations indicate that not all the identified contributions can reasonably be required, priority contributions will be determined on the basis of the individual circumstances of each case. In the case of housing developments, priority will be given to affordable housing unless there is an overwhelming need for the available contribution, in whole or in part, to be allocated for some other appropriate purpose(s).

The second priority after affordable housing will be delivery of gigabit capable internet through broadband, in line with the provisions of GN 27: Broadband and Telecommunications on New Developments. These are general priorities, but exceptions may be made in cases where there is an overwhelming need for the available contribution, completely or in part, to be allocated for some other appropriate purpose(s). For new employment developments, priority will be given to the provision of gigabit capable internet through broadband, in line with the requirements of GN 27 Broadband and Telecommunications on New Developments. As with housing developments, exceptions to this may be made where there is an overwhelming need for the available contribution, completely or in part, to be allocated for some other appropriate purpose(s).

- 5.30 New development places additional demands on infrastructure and services and therefore will be expected to make a contribution to social, cultural and physical infrastructure. The provision of adequate and efficient facilities, including utilities such as water supply; foul and surface water drainage; waste management; power generation and distribution; telecommunications; public transport; open space and community facilities, underpins the delivery of sustainable development within the Plan area.
- 5.31 It is also important that provision is made for the mitigation of potential adverse impacts of new development upon biodiversity and cultural heritage. Adverse impacts might include, for example, increased erosion, pressures on habitats and species, changes in landscape character, diminishing cultural heritage or linguistic vitality, noise intrusion, air quality and traffic congestion.
- 5.32 Where necessary, developments will be required to contribute towards infrastructure, landscape improvements and mitigation measures, through planning obligations, unilateral undertaking or a Community Infrastructure Levy as appropriate. The Council is currently assessing its position with regards to the Community Infrastructure Levy and will consider whether to introduce a Charging Schedule for larger projects. Such a Schedule would function alongside the continued use of planning obligations for small-scale infrastructure and to ensure the provision of affordable housing. Requirements for contributions could include affordable housing, transportation, physical infrastructure, flood alleviation schemes, Sustainable Drainage Systems (SuDS), energy schemes, education provision, libraries, community safety, creation or improvements of the leisure network, community facilities, and biodiversity / nature conservation. PCC will discuss any proposals to set a Community Infrastructure Levy with the Pembrokeshire Coast National Park Authority and would welcome the development of a collaborative approach on this matter. Connection to the main sewer will usually be required in conjunction with new development proposals and in this case, use of a planning condition to ensure this will not generally be adequate. The ability to connect to the main sewer should be established prior to any decision at planning application stage.

- 5.33 For housing developments, the Council is giving top priority when seeking contributions to the delivery of affordable housing. This is a reflection of the acute need for such accommodation in the Plan area, as discussed in more detail in policy GN 20 Local Needs Affordable Housing. The second priority will be the delivery of gigabit capable internet through broadband, reflecting the Council's aspiration to facilitate home working in a County that offers a high quality environment and excellent quality of life, with good access to a range of services and facilities<sup>26</sup>. For employment developments, the delivery of gigabit capable internet through broadband will be the top priority. The expectations are higher for major schemes than for smaller schemes.
- 5.34 Policy GN 26 Telecommunications and Digital Technology Infrastructure sets out the Council's policy on Telecommunications and Digital Technology Infrastructure. Policy GN 27 on Broadband and Telecommunications on New Developments elaborates on this, explaining how the Council will work with the telecommunications industry and the communications regulator Ofcom to enhance provision of high quality super-fast broadband, reduce the number of wireless not-spots and improve mobile availability for homes and businesses. New major residential and employment developments will be required to be provided with a high speed and reliable broadband connection to the premises from the outset. Smaller scale residential and employment developments will also be expected to provide access to the most viable high-speed connection available, unless this is not possible, practical or economically viable. In the latter instances, developers will be asked to provide evidence of why it is not possible. This will normally take the form of correspondence received from service providers. The Council's Broadband Team will be consulted on those housing and employment planning applications where the applicant is either unwilling to provide the expected broadband connectivity and / or argues that viability considerations preclude this being achieved.
- 5.35 Detailed requirements for any such contributions (including priorities) will be identified in SPG to enable prospective developers to factor the necessary costs into their development finance at an early stage.
- 5.36 This policy allows for the relocation of critical infrastructure, such as roads, electricity substations, pumping stations and waste water treatment facilities, as an exception, where this is either adversely affected by fluvial or coastal flooding and / or erosion or identified as extremely vulnerable in the relevant plan. With reference to point 11 of the policy, Dwr Cymru Welsh Water has prepared a Drainage and Wastewater Management Plan, which will play a major role in delivering a holistic, prioritised approach to management of the drainage and sewerage network in the years ahead, complementing the policies and proposals set out in LDPs, future SDPs and in Welsh Government's Future Wales – the National Plan 2040.

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<sup>26</sup> Pembrokeshire Recovery and Regeneration Strategy 2020-2030 [Pembrokeshire Recovery and Regeneration Strategy 2020-2030 - Pembrokeshire County Council](#)

New paragraph: The need to ensure that proposals provide required mitigation to meet Policy 12 A (formerly Policy GN 47) Water Quality and Protection of Water Resources will be considered to be an 'overwhelming need' within the terms of this policy.

#### **GN 4 Resource Efficiency and Renewable and Low-carbon Energy Proposals**

Development proposals should seek to minimise resource demand, improve resource efficiency and seek power generated from renewable resources, where appropriate. They will be expected to be well designed in terms of energy use.

Developments which enable the supply of renewable energy through environmentally acceptable solutions will be supported.

- 5.37 General resource efficiency of energy, heat and water is an important element of good design. Minimising resource demand has huge benefits, including assisting meeting UK targets to tackle climate change, reducing pressure on local resources such as water reserves and reducing long-term running costs to individual householders.
- 5.38 Welsh Government requires Local Planning Authorities to prepare Renewable Energy Assessments (REAs), which will inform Local Development Plan policies and guide the possible identification of areas of search and allocations for local authority scale (5MW to 25MW for wind energy) renewable energy schemes or other low carbon technologies. The provisions of Welsh Government's TAN 8 with regard to Strategic Search Areas (of which there were none in Pembrokeshire) have now been revoked. Instead, Future Wales: The National Plan 2040 identifies Pre-Assessed Areas for Wind Energy, one of which extends into the easternmost part of Pembrokeshire and is referenced in Policy GN 6 Renewable Energy Target and Allocations, below. Planning applications for onshore generating projects in Wales which propose an installed generating capacity of between 10MW to 50MW (and with no upper limit for onshore wind generating stations) are made directly to Welsh Ministers under the Developments of National Significance (DNS) process, with the Planning Inspectorate facilitating the consideration of such proposals.
- 5.39 Welsh Government published a Renewable Energy Toolkit for Planners in 2010, to help preparation of a robust evidence base to underpin LDP policies supporting the development of renewable and low carbon energy systems. This was updated in 2015, this latest version providing a basis for preparation of the Pembrokeshire County Council LDP REA was published in April 2017. This forms a background paper for LDP 2, providing a renewable energy policy context and outcomes from the running of various toolkit tasks. A summary of potential contributions is set out, along with an assessment of the Council's role in supporting community renewables.
- 5.40 Renewable energy technologies are found at a variety of scales, from micro-generation through to large-scale. There is also a range of different technologies available, with offshore facilities dependent on landfall infrastructure sites. These include:
- a) Generation of power from biomass

- b) Hydro-power
- c) Generation of power from landfill gas
- d) Generation of power from municipal and industrial waste
- e) Solar water heating and photovoltaics, also passive solar design
- f) Generation of power from sewage gas
- g) Tidal and tidal stream energy
- h) Wave energy
- i) Offshore wind energy
- j) Onshore wind energy
- k) Various micro-generation technologies, including micro-turbines and small-scale solar power, coupled with insulation and rainwater recycling
- l) Ground sources (accessed via heat pumps)

5.41 The sites for these proposals do not necessarily have to be directly linked to new development proposals, but major schemes will often require a functional link between the source of power and a user for the end product and / or the National Grid. Larger settlements or employment developments can provide a heat anchor for such proposals.

5.42 Landscape impact, alone and in-combination, will be a material consideration in the evaluation of renewable energy proposals, with LANDMAP and Wales' Register of Historic Landscapes providing a valuable landscape analysis tools. The exception to this is in the parts of Welsh Government's Future Wales pre-assessed area for wind energy 8, where Welsh Government has already modelled the likely impacts on landscape and found them to be capable of accommodating wind energy development in an acceptable way.

5.43 Development proposals will be expected to show that energy use has been taken into consideration at the design stage.

5.44 Once construction of a renewable and low carbon energy project has been completed, provision should be made for the removal of temporary structures, plant and equipment from the site. Once the installation has come to the end of its operational life, all structures, plant, equipment and associated infrastructure should be removed from the site. This will normally be expected to take place within 6 months of decommissioning, unless an alternative time period has been agreed with the Local Planning Authority. After decommissioning, the land should be restored to an acceptable standard – planning conditions will normally be imposed to ensure that this happens.

5.45 Community benefits, negotiations and administration are referred to in Welsh Government's TAN8 document. Some benefits can be justified as mitigation of development impacts through the planning process. In addition, developers may

offer benefits not directly related to the planning process, which may go some way to reduce impacts on local communities. However, this is not a mandatory requirement and should not be considered to be a material consideration in the determination of the planning merits of a particular scheme. If there are fundamental planning objections, community benefits will not be able to outweigh these.

- 5.46 Community benefits may take a variety of forms and cover social, economic, environmental / ecological and educational aspects. They might include in-kind benefits, such as the construction of a needed community facility, a lump sum financial payment for the benefit of the community, annual payments to the community and / or a commitment from the developer to use local labour, contractors and services wherever possible.
- 5.47 Supplementary Planning Guidance will be prepared on Renewable Energy and on the Cumulative Impact of Wind Turbines on Landscape and Visual Amenity.

**GN 5 Renewable Energy – Target and Allocations**

1. The Council will seek to permit a minimum additional 9MW per annum renewable energy capacity over the Plan period.
2. The following sites are allocated for the development of new renewable energy capacity:

Site reference	Site name	Area (hectares)	Preferred renewable energy technology
SPV/066/LDP2/01	East of Hazelbank, Llanstadwell	0.68	Solar Photovoltaic Array
SPV/149/LDP2/01	West of Ford Farm, Wolfscastle	1.55	Solar Photovoltaic Array

5.48 Planning Policy Wales recognises that the planning system has an active role to play in ensuring Welsh Government Renewable Energy targets are met. As part of this LPAs are required to establish local renewable energy targets. Planning Policy Wales states that Planning authorities should consider the renewable energy resource they have available in their areas when formulating their renewable energy target, informed by an appropriate evidence base, and use the full range of policy options available, including developing spatial policies in their development plans. Targets must not be seen as maximum limits, but rather used as a tool to maximise available resource, and where proposals exceed the target, they should not be refused.

5.49 Over the last three years the amount of new renewable energy capacity consented has averaged 6MW per annum. In the absence of feed-in tariff incentives, that provides a baseline expectation for an annual target for new consented capacity for the new Plan. However, as this policy also includes two Solar PV Array allocations and there is also a possibility of a further Solar PV Array on part of the former Brawdy Airfield site, the target has been increased to a minimum of 9MW per annum, in the expectation of delivery in excess of the baseline position.

5.50 Clearly it is possible that new incentives to deliver renewable energy capacity will emerge during the Plan period – and this may be reflected in an upturn in applications. If so, the criteria-based policies of the Plan on renewable energy and the allocations for renewable energy may facilitate the target to be exceeded.

5.51 Any additional consented renewable energy capacity will, of course, need to respect environmental, landscape and grid capacity constraints within the Plan area and general policies on these areas will be a key consideration during determination. The exception to this in relation to landscape is in the parts of Welsh Government's Future Wales pre-assessed area for wind energy 8, where

Welsh Government has already modelled the likely impacts on landscape and found them to be capable of accommodating wind energy development in an acceptable way.

### GN 6 Development Proposals in Pre-Assessed Areas for Wind Energy (as set out in Future Wales)

In Pre-assessed Areas for Wind Energy defined by Future Wales, local policies and planning decisions should not prejudice the ability for large-scale wind energy developments to come forward.

- 5.52 Large-scale energy developments are classed as Developments of National Significance and are determined by the Welsh Ministers. For on-shore wind generation, these are schemes of 10MW or more.
- 5.53 Welsh Government's Future Wales document forms an element of the Development Plan and defines spatially a number of pre-assessed areas for wind energy developments. One of these areas, area 8, extends west from Carmarthenshire into the eastern part of Pembrokeshire. Within these areas, Welsh Government has already modelled the likely impact on the landscape and has found them to be capable of accommodating development in an acceptable way. There is therefore a presumption, set out in Future Wales policy 17, in favour of large-scale wind energy development (including re-powering) in these areas, subject to the provisions of Future Wales policy 18.
- 5.54 PPW edition 12, paragraph 5.9.18 advises that Local Planning Authorities should not seek to amend the Pre-Assessed Areas within their boundaries as they form part of the Development Plan. It adds that while other land uses can be defined within the Pre-Assessed Areas (including renewable energy sites of below 10MW), any local policy and planning decision should not prejudice the ability for large-scale (10MW or more) wind developments to come forward within the Pre-Assessed Areas. The purpose of Policy GN 6 is to ensure that this does not happen in respect of the part of Pre-Assessed Area 8 that extends into Pembrokeshire.
- 5.55 Proposals which come forward as a result of implementation of this policy must ensure that there would be no adverse effects on the integrity of Natura 2000 / Ramsar sites (to comply with PPW 12 and TAN 5).

[New Para 5.55a: The impact on peatland soils and habitats is an important consideration in the siting of wind energy projects. Peatland is identified on the Peatland Data Portal<sup>\\* New footnote</sup> and on PCC's LDP Constraint map. Peatland is an irreplaceable resource and considerable weight should be given to protecting it. If peat is identified within a proposed development it will be necessary to refuse permission unless other significant material considerations indicate otherwise. It will be necessary for proposals to avoid areas of peatland in line with the step-wise approach as laid out in paragraph 6.4.15-1a in Planning Policy Wales Edition 12.](#)

<sup>\*</sup> [New footnote: For further detail on the location of important peatland in Pembrokeshire see https://smnr-nrw.hub.arcgis.com/apps/d18ef8c74ecc4dc4a0cbf71ab6935ba0/explore](https://smnr-nrw.hub.arcgis.com/apps/d18ef8c74ecc4dc4a0cbf71ab6935ba0/explore)



### GN 7 Cawdor Barracks including the former Brawdy Airfield

Cawdor Barracks continues in Operational use as a military base ~~will continue in the early part of the Plan period.~~ Once Should military use of the site ceases during the Plan period, the future use of each of the two distinct parts of the site will be considered on the following basis subject to their compatibility with other Plan policies and with any retained military uses and civilian and/or military aviation use (including the HRDF) in accordance with a development brief to be prepared and adopted by Pembrokeshire County Council in agreement with the DIO/MOD:

1. For the area of the airfield (also referred to as the area 'outside the wire'), approximately 216 hectares:
  - a) Agricultural use with linked environmental stewardship;
  - b) Environmental stewardship of land not in active agricultural use;
  - c) Solar photovoltaic arrays, subject to the policy requirements set out elsewhere in the Plan being met and due account being taken of the potential landscape impact on the Pembrokeshire Coast National Park and the safeguarding requirements associated with the HRDF and other onsite infrastructure and any retained military uses. ~~A part of the 'outside the wire' site is specifically allocated for a solar PV array by policy GN 5, but the potential for such use also exists on other parts of the 'outside the wire' site.~~
  - d) Low impact activity-based tourism and conservation-based tourism, linked to hubs for such activity on the barracks ('within the wire') site subject to the safeguarding requirements associated with the HRDF and any retained military uses.
  - e) Enhancement and if necessary new provision of walking and cycling routes within the site and potentially linking with the existing network beyond the site boundary, subject to the safeguarding requirements associated with the HRDF and any retained military uses.
2. For the area of the barracks (also referred to as the area 'within the wire'), approximately 62 hectares:
  - a) Release of the existing MOD housing (primarily married-quarters housing stock) to the market.
  - b) Small-scale new-build residential development to supplement the existing MOD housing, with, if necessary, the involvement of Housing Associations and Community Land Trusts and potentially including self-build opportunities. The scale of any new provision should not exceed that which would be deemed acceptable in an LDP 2 Service Village. As in other parts of the Plan area, an element of affordable housing will be expected on any new build schemes, at the 10% rate that is applied in nearby Service Villages.
  - c) Phased demolition of the buildings that are no longer required and mitigation of any associated contamination of buildings and land.

- d) Small-scale employment proposals, consistent with policy GN 8 and in the context that this land will be treated in the same way as that within a LDP 2 Settlement Boundary.
- e) Activity based tourism and conservation based tourism, both of which could potentially connect with low-impact activities on the 'outside the wire' site and to enhanced provision of walking and cycling opportunities, [subject to the safeguarding requirements associated with any retained military uses](#).
- f) Retention and where necessary enhancement of existing community facilities, open space, green infrastructure, sport and recreational provision within the site, possibly linking to activity based tourism and conservation based tourism activities, [subject to the safeguarding requirements associated with any retained military uses](#).
- g) Enhancement of access arrangements and transport infrastructure to facilitate the above, [subject to the safeguarding requirements associated with any retained military uses](#).
- h) Small-scale renewable energy proposals, subject to compliance with the Council's general policies on this matter and due account being taken of the potential landscape impact on the Pembrokeshire Coast National Park and the safeguarding requirements associated with the HRDF [and any retained military uses](#).

5.56 Brawdy Airfield was used as an RAF satellite station from 1944 to 1992 and was turned over to the British Army and renamed Cawdor Barracks in 1995. The 14 Signal Regiment and the Army's electronic warfare unit currently occupy it. [Whilst the site remains on the DIO Disposals Database in the House of Commons library, the Ministry of Defence is continuing to consider options for the future of Cawdor Barracks, which may be disposed of in whole or part proposing a phased vacation and disposal of the site from 2028. The operational use of Cawdor Barracks, including the former Brawdy Airfield, will come to an end during the Plan period. Current proposals envisage the phased closure and disposal of the site from 2028.](#) The site was originally compulsorily purchased, a consequence of which is that Crichel Down Rules will apply on parts of the site, which specify the manner in which disposal must take place. Some parts of the site may therefore have to be offered back to the original owners (or their successors) at market price and there are also requirements to check whether other government departments wish to use the land.

5.57 In 2015, Pembrokeshire County Council commissioned Arup consultancy to prepare a report on the future use of the site. The commission was made on behalf of the Pembrokeshire Advance (Rural Development Programme) Partnership and the Defence Infrastructure Organisation and focussed on the options for the future use of the Cawdor Barracks and former Brawdy Airbase. The report combines a baseline study, options for future use and potential delivery mechanisms, with some market testing and a more detailed analysis of issues and options.

- 5.58 While the report is now several years old, its conclusions remain valid and have provided a foundation for the site-specific policy approach set out in this policy. Those conclusions have been set in the context provided by the replacement LDP policies and proposals, particularly regarding the scale of development that might be envisaged for the area of the former barracks (the 'within the wire' element of the site) [if disposed of in whole or part](#).
- 5.59 The possibility of future use of parts of the site for renewable energy technologies has been raised ~~and PCC has allocated land for a solar PV array under policy GN 5 on a part of the former airfield site. The basis for that proposal was contained in the Arup report, but the precise boundaries have been modified to reflect the safeguarding requirements associated with the HRDF and should be revised if there is any retained military use~~. There may be potential for ~~further~~ solar PV arrays, ~~particularly~~ on the former airfield site (~~'outside the wire'~~), subject to matters such as the presence of the HRDF, ~~any retained military use~~ and the proximity of the Pembrokeshire Coast National Park being taken into consideration.
- 5.60 The other main terrestrial renewable energy technology is wind energy. PCC commissioned Simon White to investigate the potential for wind energy on this site and report back to the Council. The outcome of this work is recorded in an evidence base paper entitled 'Brawdy Airfield - Landscape and Visual Appraisal of Potential Wind Energy Development - June 2021'. Paragraph 7.23 concludes 'Overall, whilst smaller wind turbine development up to 35m may be possible, subject to further assessment, it is not considered to be a desirable form of renewable energy on this site in terms of landscape, seascape and visual effects on the PCNP. From that, it seems that some limited wind turbine development may be possible, but it is not favoured at this site. This policy provides a framework for consideration of the future use of this complex site. It reflects the site's potential for re-use and also the constraints to that re-use, including its location in a part of Pembrokeshire that is distant from both the trunk road network and any rail connections and uncertainties about market interest and potential end users. In the short to medium term, consideration must also be given to the nearby coastal adaptation project at Newgale, which will require a diversion of the A.487 away from the shingle bank. To facilitate the above, the Council will prepare a development brief for the future use of the site, working with the DIO / MOD and with other interested parties, including the Pembrokeshire Coast National Park Authority. This would then be adopted by the Council as Supplementary Planning Guidance.

## LIVING AND WORKING GENERAL POLICIES

### GN 8 Employment Proposals

Employment proposals (in use classes B1, B2 and / or B8) will be permitted:

1. On sites allocated for employment uses by policy SP 14, above or GN.7, below; or
2. On unallocated land within Settlement Boundaries; or
3. On sites adjacent to a Settlement Boundary, if no sites allocated for employment purposes and / or within the same Settlement Boundary exist to serve the development; or
4. In countryside locations, but only if no other suitable sites exist in the local area and where the enterprise requires such a location;
5. Within the footprint of existing industrial estates outside Settlement Boundaries, where a vacant plot remains undeveloped, a reversion to an employment use is proposed following a non-employment change of use or a previous employment or other use has been abandoned; or
- 5.6. Where conversion or change of use of agricultural buildings outside a Settlement Boundary for employment purposes is proposed, under the terms of policy GN 34 (Conversion or Change of Use of Traditional Buildings Outside Settlement Boundaries).

Where B2 employment uses are proposed, these must not cause significant detrimental impact on local amenity, in the context provided by policy GN 1, criterion 2.

- 5.61 Economic land uses cover a range of different land uses, including the traditional land uses that fall within the B-class uses of the Use Classes Order and also other types of activity, including retail, tourism, public services, construction, energy, minerals, waste and telecommunications. This policy focuses on the traditional employment land uses within Use Classes B1, B2 and / or B8. There are separate plan policies to cover many of the other economic land uses.
- 5.62 Planning authorities provide land to meet employment market needs at a variety of scales, including strategic and local. Sites of regional importance allocated for employment purposes are identified in strategic policy SP 14. Further sites of local strategic importance and / or to meet local employment needs are allocated in policy GN 9.
- 5.63 This policy sets out the circumstances in which employment proposals in the B-class uses will be permitted, covering both allocated sites and unallocated sites proposed for windfall employment developments.
- 5.64 The policy will support the provision of new employment proposals on unallocated land which is within a Settlement Boundary or adjacent to a Settlement Boundary. Such development in countryside locations may also be

permitted where there are no other suitable sites and the enterprise requires such a location. This can help to support Welsh language communities by providing employment opportunities for local people. Where a countryside location is proposed, applicants will be expected to provide a justification to support the chosen location at application stage.

- 5.65 Where the proposal under consideration is in a countryside location and is directly linked to the Celtic Freeport, the strategic need to support the Freeport must be considered alongside the national and local constraints.

### GN 9 Employment Allocations

The following sites are allocated for employment uses in use classes B1, B2 and / or B8: Sites with issues regarding phosphorous or nitrogen are suffixed 'P' or 'N' respectively.

Site reference	Site name	Area (hectares)	Use classes
EMP/030/00001	Parc Gwynfryn, Crymych	6.92	B1, B8
EMP/034/00006	Celtic Link Business Park, near Scleddau <u>N</u>	13.29	B1, B2, B8
EMP/040/LDP2/01	Withybush Showground, Haverfordwest <u>P N</u>	9.74	B1, B2, B8
EMP/053/00001	Old Station Yard, Letterston <u>P N</u>	1.23	B1, B8
EMP/088/LDP/01	Rushacre Enterprise Park extension, Narberth <u>P N</u>	1.33	B1, B8
EMP/000/LDP2/01	Land at Princes Gate Spring Water	4.33	B1, B8
EMP/030/LDP2/01	South of Parc Gwynfryn, Crymych	1.79	B1, B8
EMP/132/LDP2/01	South of K.P. Thomas & Sons, near Templeton <u>N</u>	2.57	B1, B8
EMP/093/00001	North of Honeyborough Industrial Estate, Neyland <u>N</u>	1.55	B1, B8

The specified uses are those that will be permitted on the listed sites. Where appropriate, other classes of employment use or compatible sui generis uses may also be permitted (or combinations of such uses). Development will not be permitted that would result in an adverse effect on the integrity of sites of national nature conservation importance. Proposals where adverse effects on site integrity cannot be ruled out will not be supported. Of particular concern are sites where potentially nutrient issues may arise. Sites are annotated with the suffix 'P' for phosphorous and/or 'N' for nitrogen to denote where screening and appropriate assessment for the Local Development Plan has identified nutrient issues requiring addressing.

5.66 The sites allocated by this policy are those deemed suitable for traditional employment land uses in the B-class Use Classes. However, not every site identified by this policy is considered suitable for the full range of B-class uses –

the right hand column of the allocations table sets out the uses that would potentially be supported on a site-by-site basis.

- 5.67 The allocated sites are those considered appropriate to meet future demand for local employment sites.
- 5.68 The allocation of these sites complements the provision of regionally significant strategic employment sites under strategic policy SP 14.
- 5.69 The Council recognises that future need for employment land will also, to an extent, be made through 'churn' on existing employment sites. To elaborate, uses within these sites commence and cease on a regular basis, meaning that at any one time, there will be land and buildings in use and out of use within the boundaries. The Council monitors the situation on the main existing employment sites through regular employment land surveys, the outcomes of which are published on the Council's website.
- 5.70 The most significant of the existing employment sites are also listed in the Council's Supplementary Planning Guidance on Development Sites, this document also providing additional information on the sites allocated for employment purposes by policies SP 14 and GN 9.
- 5.71 The allocations of SP 14, GN 9, together with 'churn' on existing sites, will in combination ensure that there is a continuous supply of suitable, available employment land across the Plan area, providing choice and flexibility, to meet the requirements of Planning Policy Wales edition 12 (February 2024 and Technical Advice Note 23 on Economic Development (February 2014).

### GN 10 Mixed-Use Proposals

Mixed use proposals will be permitted where they are suitable for the location, assessed against the policies of this Plan and national planning policy. Impact on the amenity of those living on the site, or near the site will be a key consideration in the acceptability of proposals.

The following sites are allocated for mixed use. Sites with issues regarding phosphorous or nitrogen are suffixed 'P' or 'N' respectively.

Site reference	Site name	Area (hectares)	Use
MXU/040/01	Old Hakin Road, Haverfordwest	1.32	Housing (C3 use class) and employment (B1 and B8 use classes)
MXU/095/LDP2/01	South Quay, Pembroke <u>N</u>	0.50	Retail, commercial and community uses

The allocation at Old Hakin Road site is a for mixed housing and employment use development, within which a considerable proportion of the development will be employment-related.

The allocation at South Quay, Pembroke is within Pembroke Town Centre and Policy GN 31 Town Centre and Local Retail Centre Development will be a key consideration in the acceptability of any proposals. Redevelopment proposals at this location have been taken forward through planning applications and are currently being implemented.

Individual proposals coming forward under policy GN 10 will require screening for project level Habitats Regulation Assessment to consider their likely significant effects on Special Areas of Conservation and Special Protection Areas. One element of this is that there must be no increase in nutrients into the Milford Haven Inner Pembrokeshire Marine SAC and developers will have to demonstrate this within their proposals to ensure satisfactory HRA outcomes (see also Policy GN 47 Water Quality and Protection of Water Resources as proposed for amendment). Sites are annotated with the suffix 'N' for nitrogen to denote where screening and appropriate assessment for the Local Development Plan has identified nutrient issues requiring addressing.

- 5.72 This policy relates to mixed-use proposals including residential, employment, commercial or community uses. Other types of mixed-use development may be proposed and will be considered under relevant LDP policies for the land uses described, or in their absence in accordance with Welsh planning policy.
- 5.73 Mixed-use housing and employment proposals may take the form of live-work units, where the residential and employment uses are found within the same building. Alternatively, a mix of separate residential and stand-alone

employment uses may be proposed within a single site. In each case, amenity considerations must be satisfactorily addressed.

- 5.74 It is possible to combine a range of uses, including housing and employment uses, within a single site and this can contribute to meeting sustainable development aspirations, by facilitating home-working or working on a site very close to home. This will minimise or eliminate the need for commuting between home and work.
- 5.75 The allocated site at Old Hakin Road, Haverfordwest has a current permission for mixed use housing and employment (and some other ancillary uses) that the Council wishes to see taken forward to implementation stage during the Plan period.
- 5.76 The site at South Quay (Northgate Street and Castle Terrace) is within Pembroke Town Centre and has Retail Frontage at much of the ground level street front. Policy GN 31 'Town Centre and Local Retail Centre Development', will be a key consideration in the acceptability of any proposals, while noting that some elements of what is proposed are being taken forward through planning applications considered under the 2013 LDP and are being implemented.
- 5.77 Where a site is developed for mixed-use housing and employment purposes and a proposal is subsequently received proposing loss of the employment element, the requirements of policy GN 11 (Protection of Employment Sites and Buildings) must be satisfied.

### GN 11 Protection of Employment Sites and Buildings

Proposals to redevelop, or use, business, general industrial, storage or distribution sites (those within use classes B1, B2 and B8) for other purposes will only be permitted where site is not a Strategic Employment Site as identified by Policy SP 14 Strategic Employment Provision and one of the following criteria is met:

1. The present use is inappropriate for the locality;
2. There is adequate alternative provision for employment land in the vicinity (the settlement in question or land immediately adjoining that settlement); or
3. The continued use of the site or premises has been shown to be unviable.

This policy also applies where a non-employment use is proposed on a site allocated for employment purposes by this Plan, excepting the mixed-use allocation under policy GN.8 Employment Proposals, where the principle of mixing employment and non-employment uses is already established.

5.78 The purpose of this policy is to ensure that existing sites used for employment purposes in use classes B1, B2 and B8 are not lost to other uses, unless there is a clear justification for accepting an alternative use. This will help to ensure that an adequate supply of employment sites remains available in the Plan area. Loss of such sites is only permitted where one of the policy criteria can be satisfied.

5.79 With specific reference to criterion 1, to demonstrate that an existing employment use is inappropriate for a locality, a developer should provide evidence relating to the nature, scale, impact on the local road network and / or local amenity of the current use.

5.80 With specific reference to criterion 3, evidence of a lack of viability should include:

- Evidence of a lack of financial profit (for example from published accounts); and
- Evidence of an inability to sell / rent the site.

5.81 With specific reference to criterion 2, a developer should provide evidence that there is alternative and adequate provision of employment land in the vicinity. The Council carries out regular Employment Land Surveys and publishes the results on its web-site. This provides an up-to-date evidence base regarding provision of employment land across the Plan area.

### **GN 12 Extensions to Employment Sites**

Proposals to diversify, intensify and / or extend an existing businesses (in use class classes B1, B2 and / or B8) onto adjoining land will be permitted where the scale and nature of the original development, together with the extension, is compatible with its location, including potential impacts on the amenity of adjacent land users.

5.82 Future Wales – the National Plan 2040 – recognises the positive role planning authorities can play in meeting rural employment needs and increasing economic prosperity. The purpose of this policy is to facilitate growth of existing businesses in use classes B1, B2 and / or B8, by allowing their expansion onto land adjoining the current operational area. In appropriate circumstances, this will allow business growth without requiring re-location of the business. Compatibility of the original use and its proposed extension area with the location is required, in particular taking account of possible impacts on the amenity of adjacent land users.

### GN 13 Residential Development

Residential development ~~including self-build~~ will be permitted ~~where the proposal is for one or more of the following:~~

- ~~1. Open market housing (including self-catering accommodation) or affordable housing to meet local needs, located~~ within the Settlement Boundary of a Main or Rural Town, Service Centre, Service Village or Local Village as defined in the settlement hierarchy;
- ~~2.1. Where it is for~~ the replacement or sub-division of an existing dwelling;
- ~~3.2. The conversion of an historic building to residential use; or~~
- ~~4.3. A rural enterprise worker's dwelling or One Planet development~~

New homes on allocated sites in Service Centres and Service Villages and otherwise on sites of 0.10 hectares and above will be built at a density of at least 23 dwellings per hectare, rising to at least 30 dwellings per hectare for sites in Towns. A lower density may be justified ~~in exceptional circumstances, such as where there is~~ evidence of infrastructure or physical constraints ~~may justify a lower density.~~

Development will not be permitted that would result in an adverse effect on the integrity of sites of national nature conservation importance. Proposals where adverse effects on site integrity cannot be ruled out will not be supported. Of particular concern are locations where potentially nutrient issues may arise.

- 5.83 The principle of building new homes within Settlement Boundaries is supported as these are locations with good access to services. New homes in Towns, Service Centres, Service Villages, ~~and~~ Local Villages ~~and Hamlets~~ can be for sale on the open market or be affordable housing to meet local needs, depending on the specific policy requirements in that area. The release of sites as an “exception” to general housing provision is addressed in Policy GN 21 Exception Sites for Local Needs Affordable Housing.
- 5.84 Redevelopment or replacement can allow the development of housing accommodation which is better adapted to meeting present and future housing needs, contribute to energy efficiency and reduced carbon dioxide levels as long as the quality of the environment is enhanced. A policy on Replacement Dwellings in the Countryside is covered in Policy GN 14 Replacement dwellings in the Countryside. The sub-division of an existing dwelling into two or more separate dwellings will be permitted subject to the criteria of GN 1 General Development Policy being met. Particular consideration will be given to the impact of the proposed sub-division on the amenity of the intended occupiers and neighbouring residents, the effect on the character and appearance of the building and the implications for local parking and traffic capacity.
- 5.85 Conversions of historic buildings to residential use will be permitted where the applicant demonstrates exemplary standards of design and sustainability. Such buildings can make a significant contribution to the aesthetic quality of urban and

rural landscapes and the proposal must demonstrate that it complements and enhances its surroundings. Proposals for conversion of historic buildings will be permitted subject to the structure being capable of conversion without extensive alteration and retaining substantially the original form, with few changes to cosmetic detail. Such buildings may include town or country houses, religious buildings and former military premises. Any conversion of an historic building must preserve and enhance external and internal features that are indicative of its former uses. The conversion of agricultural buildings is dealt with under GN 34 Conversion or Change of Use of Traditional Buildings and the Expansion of, or Alterations to, Previously Converted Traditional Buildings outside Settlement Boundaries

- 5.86 Proposals to provide residential accommodation for an essential rural enterprise worker will be determined against the principles of Technical Advice Note 6 (July 2010). The applicant must demonstrate a functional need to be based in close proximity to the enterprise, and that no viable alternative accommodation exists locally, including conversion opportunities and dwellings available on the housing market.
- 5.87 Where proposals for residential development are within coastal change areas, the provisions of policy GN 46 Coastal Change should also be taken into consideration.
- 5.88 It is important that new residential development uses land efficiently, but also that opportunities for the enhancement of biodiversity are adopted. It is also essential that proposals incorporate appropriate mitigation for Sustainable Drainage Systems and address requirements to maintain and enhance biodiversity by respecting natural features such as hedge boundaries and establishing buffers around wildlife corridors where appropriate. As a result of these requirements a minimum density of 23 dwellings per hectare in Service Centres and Service Villages is identified and 30 dwellings per hectare in Towns, to ensure the efficient use of land across the Plan area. For clarity, these are based on gross site area: net densities will accordingly be higher. The density of residential development will be higher in towns because the concentration of services in these locations can and should serve higher population densities. In exceptional circumstances, for example where development would otherwise have an unacceptable impact on issues such as highway safety, biodiversity or sustainable water supplies, a lower density may be accepted.

### GN 14 Replacement Dwellings in the Countryside

Proposals for the replacement of an existing dwelling in the countryside will be permitted where:

1. The proposed dwelling would replace an existing residential dwelling with an established lawful residential use;
2. The proposal would not result in the loss of a Listed Building (one of special architectural or historic interest) or of interest in terms of its local vernacular character, unless it can first be demonstrated that the building is structurally unsound and repairs are economically unviable;
3. The replacement dwelling should be sited on, overlap or adjoin the footprint of the existing dwelling and in all cases be within the existing residential curtilage, unless there are demonstrable planning advantages to an alternative siting;
4. The replacement dwelling should not be significantly larger than the dwelling to be replaced and its design, scale, siting materials, external appearance and landscaping shall be compatible with the surrounding built and natural environment; and
5. Any outbuildings shall be appropriate in scale.

5.89 This policy supports the replacement of an existing, lawful dwelling in the countryside and seeks to;

1. Ensure dwellings in the countryside provide a range and mix of size of dwellings; and
2. Safeguard the countryside from overly prominent forms of built development.

5.90 A replacement dwelling must adhere to the principles of good design. It should respect the visual appearance, character and nature of its surroundings and should not introduce a more visually intrusive form of development to the landscape.

5.91 The replacement dwelling should be located on, overlap or adjoin the footprint of the existing dwelling. A change to the siting of the dwelling may be acceptable where there are demonstrable environmental, access or visual advantages. Any unnecessary encroachment into the countryside through the extension of residential curtilage will not be permitted.

5.92 Each proposal for a replacement dwelling will be considered on its merits. However, as a general guide, a replacement dwelling within the countryside with a total floorspace which is more than 50% greater than that of the dwelling to be replaced is likely to be considered 'significantly larger' and may not be acceptable.

5.93 When granting planning permission for a replacement dwelling in a sensitive location, permitted development rights which ordinarily enable the erection of

some domestic extensions and free-standing buildings without the need for planning permission may be withdrawn by a planning condition in order to control any further increase in built development.

### GN 15 Housing Mix, Second Homes and Short-term Holiday Lets, Space Standards and Requirements for Lifetime Homes Standards

New and existing residential development should contribute to the creation of balanced communities and meet the market and affordable housing needs of the local community. Proposals for residential development (including the change of use) should:

- A. Maximise the delivery of affordable housing in accordance with Policy GN 20 – Local Needs Affordable Housing;
- B. Provide an appropriate mix of housing types, tenures and bedroom numbers, to meet the identified needs of the Plan’s current and future communities;
- C. Provide an appropriate balance of housing as main, primary residences (Use Class C3), secondary residences (Use Class C5) and short-term lets (Use Class C6) to ensure housing is available for people in local need, to maintain and strengthen the Welsh language and culture and to sustain existing communities;
- D. All new build residential development on sites of 5 or more units must provide a minimum of 20% of properties built to Lifetime Homes Standards [or equivalent](#) and in addition, wheelchair user dwellings will be supported; and
- E. All residential development must be built in accordance with identified space standards, unless the proposal is for the adaptation or conversion of a listed, historic or traditional agricultural building and it is not possible for the building to meet the standards without impacting negatively on the character of the property.

5.94 The housing market in the plan area is challenged with high house prices and affordability issues, high numbers of second and holiday homes and an ageing population. The latest Local Housing Market Assessment (LHMA) sets out the requirements for different affordable housing types including bedroom number and tenure by Housing Market Area. The Council will also consider information from the Housing Register to assess the suitability of the proposed mix of housing. A collaborative approach, based on the evidenced viability of the new development will be taken in order to establish an appropriate mix of housing types and tenures which will contribute to the objective of achieving mixed and sustainable communities.

5.95 Changes to The Town and Country Planning (Use Classes) (Amendment) (Wales) Order 2022 give the Local Planning Authority the ability, where there is robust local evidence, to control the numbers of second homes and short-term lets in a specific geographical area. Local Planning Authorities can, through an Article 4 Direction, require that planning permission is sought to change the use between existing main (primary) residence (Use Class C3), second home (Use Class C5) or short-term let (Use class C6) in the area(s) to which the Article 4 Direction refers. In relation to new residential development, conditions may be placed on new dwellings to restrict their use to a main (primary) residence (C3), where a condition would meet the relevant tests. Supplementary Planning

Guidance will be prepared in accordance with emerging evidence on second homes and short-term lets in the plan area.

- 5.96 The Authority will also monitor on an annual basis, from the base date of the Plan (2017), the percentage of housing completions of new build housing to check if the occupancy of housing completions is within the allowance rate of 8.1% for holiday lets and second homes included in the housing requirement. At the point where 50 or more holiday and second homes are developed over and above the Local Development Plan allowance for such provision this will require further investigation and action. This assessment will be carried out on an annual basis and published in the Annual Monitoring Report.
- 5.97 Where such trends are identified the planning authority will need to investigate what mitigation is required. Taking account of the influence of wider fiscal initiatives on trends, land use planning options may also need to be considered, including identifying if there are specific locations where the allowance has been exceeded and where there is planned new additional housing in the Plan period which requires additional controls.
- 5.98 This new housing may need to be suitably conditioned to ensure that proposals reflect the intended housing provision mix including the level of self-catering and/or second home properties vacancy rate allowance for that constituent Community/Town Council area which originally informed the Policy SP 2 Housing Requirement allowance.
- 5.99 The Council has identified an ageing population as a key issue for the LDP. Alongside the trend for increasing numbers of over 65s is a trend for an increasing need for properties to be adaptable and potentially accommodate wheelchairs. [The Local Housing Market Assessment 2022 identifies that there will be a significant increase in the proportion of the population with a disability between 2017 and 2033.](#) [Paragraph 6.11 of the Local Housing Market Assessment 2023 advises that ‘In total 11,518 adaptable homes are required in 2036 in Pembrokeshire, of which 7,014 should be in the market sector and 4,504 in affordable accommodation. Of the 11,518 adaptable homes required, 9,957 should be in the general housing stock and 1,561 in supported accommodation.’](#) [Paragraph 6.12 adds that ‘Whilst the future requirement for Lifetime Homes has been identified, there is limited information on the number of dwellings that fulfill this criterion in Pembrokeshire and therefore there is not a detailed profile of the current stock from which to derive a net requirement. However, the Regional Housing Market Assessment for South West and Mid Wales report estimates that there are currently around 7,000 such homes that fulfill this criterion.’](#) [Paragraph 6.13 concludes that ‘Overall, the requirement for 11,518 adaptable homes implies that a notable uplift will be required to the number of homes that meet this standard currently, and that by the end of the plan period around about 18.3% of the total stock should be available that meet this criterion.’](#) On this basis 20% of properties on sites of 5 or more must be built to Lifetime Homes standards. Where market properties are proposed on a site, the percentage

requirement will apply to the market properties specifically as Lifetime Homes standards is a requirement of Welsh Development Quality Requirements 2021. Lifetime Homes standards ensure that for two storey properties they are standard wheelchair accessible downstairs and that the stairs are straight and so can potentially accommodate a stair lift without a need for a bespoke track. Bungalows built under these standards have a wider turning circle in the hall areas. Ensuring an appropriate mix of properties to meet the needs of the population is a critical element of ensuring that the Council meets the requirements of the Health and Well-being Act. ~~In addition, the Local Housing Market Assessment 2022 predicts that by 2036, there will be a requirement for 4.1% of the total housing stock to be wheelchair accessible and homes built to wheelchair accessible standard will be supported. Paragraph 6.14 of the LHMA 2023 advises that 'There is also a requirement for wheelchair user dwellings. Using the same data sources but focusing specifically on those that require fully wheelchair accessible housing within the letting figures, it is possible to follow the same method to produce equivalent results that identify the future requirement for a wheelchair accessible home in Pembrokeshire in 2036.'~~ Subsequent paragraph 6.15 elaborates on this, saying 'In total 2,562 wheelchair user dwellings are required in 2036 in Pembrokeshire, of which 1,630 should be in the market sector and 931 in affordable accommodation. Of the 2,562 wheelchair user dwellings required, 1,974 should be in the general housing stock and 588 in supported accommodation. The Regional Housing Market Assessment for South West and Mid Wales report estimates that there are currently around 1,440 wheelchair accessible homes in the market sector with 710 in the affordable sector. This implies that the net requirement between 2020 and 2036 is for 190 new wheelchair homes in Pembrokeshire in market accommodation and 221 in affordable housing.' Paragraph 6.16 adds that 'by the end of the plan period, around about 4.1% of the total stock should be available to meet this criterion.'

5.100 Ensuring that homes are built to appropriate space standards is part of delivering development that is future proof, adaptable and flexible. It means that properties are more likely to meet the needs of the population as they provide a more generous internal floor area with sufficient storage. This is part of ensuring that properties meet well-being requirements.

<u>Space Standards</u>	<u>WDQR*</u>	<u>WDQR Appendix A*</u>	<u>Lifetime Homes* in WDQR Lifetime Homes ** in Policy GN15</u>	<u>WDQR Gross Internal Floor Space * Appendix B</u>	<u>Building Regulations M 4 ***</u>
<u>Social Rented (Publicly Funded)</u>	<u>100%</u>	<u>100%</u>	<u>100%</u>	<u>100%</u>	<u>100%</u>
<u>Affordable S106/condition</u>	<u>N/A</u>	<u>100%</u>	<u>100%</u>	<u>100%</u>	<u>100%</u>
<u>Private</u>	<u>N/A</u>	<u>N/A</u>	<u>20%</u>	<u>N/A</u>	<u>100%</u>

\* = Welsh Development Quality Requirements 2021

5.101 ~~The Council has used the English nationally prescribed space standards as a basis to inform the testing of viability on housing sites.~~ The requirement for 20% of properties on sites of 5 or more to be built to Lifetime Homes standards has also been included in the viability testing for the Plan. These space standards and requirements form the basis of the PCC space standards which will be set out in the Residential Design SPG, alongside specific requirements linked to ensuring properties can accommodate local recycling approaches. The SPG will demonstrate how these space standards can be introduced in the design of residential properties.

**GN 16 Residential Allocations**

The following sites are allocated for residential development:

The following sites are allocated for residential development:

Sites or phases of sites with a WwTW permit review programmed are suffixed with ‘\*’

Sites with phosphorous or nitrogen issues are suffixed ‘P’ and/or ‘N’ respectively.

LDP2 Reference	Site Name	Settlement	<u>Expected</u> Minimum Units In Plan Period	Indicative Affordable Housing Requirement Percentage (%)	Indicative Affordable Housing Requirement Unit Number	Delivery timescale Year 1-5 (ST) Year 6-10 (MT) Year 11- 16 (LT)	<u>Expected</u> Units Beyond The Plan Period	Area Ha	Potential For Self Build Indicated By Site Promoter
HSG/040/LDP 2/1	Former Community Education Centre, Dew Street <b>P N</b>	Haverford west	22	100%	22	<b>MT LT</b>	0	0.63	No
S/HSG/040/L DP2/6 <u>(summary)</u>	Slade Lane (see policy GN 18) <b>P N</b>	Haverford west	<b>330</b> <b>487*</b>	<b>83</b> <b>50% 40%</b>	<b>275</b> <b>165 194</b>	MT/LT	<b>680 312</b>	38.88	<u>Not Known</u>
<u>S/HSG/040/L DP2/6 (phase 1)</u>			<b>115*</b>	<b>48%</b> <b>36.5%</b>	<b>55 42</b>				<u>No</u>
<u>S/HSG/040/L DP2/6 (phase 2)</u>			<b>103</b>	<b>52% 56%</b>	<b>54 58</b>				<u>Not Known</u>
<u>S/HSG/040/L DP2/6 (phase 3)</u>			<b>112 269</b>	<b>50% 35%</b>	<b>56 94</b>				<u>Yes</u>
HSG/040/LDP 2/3	Rear of 76 Pembroke Road <b>N</b>	Merlins Bridge	51	<b>22.5</b> <b>21.6%</b>	11	LT	0	1.71	Yes

\*of which 46 Open Market completed April 25

HSG/086/002 22	South West of The Meads	Milford Haven	93	100%	93	MT/LT	0	3.1	Not Known
HSG/086/LDP 2/1	Land at Myrtle Meadows, Steynton	Milford Haven	<del>60</del> <u>65</u>	15.4%	<u>910</u>	LT	0	3.07	No
HSG/086/LDP 2/2	East of Castle Pill Road Steynton	Milford Haven	23	Off-site contribution		MT/LT	0	0.78	Yes
HSG/086/LDP 2/4	Former Hakin Infants' School	Milford Haven	14	100%	14	LT	0	0.49	No
LDP2 Reference	Site Name	Settlement	<u>Expected</u> Minimum Units In Plan Period	Indicative Affordable Housing Requirement Percentage (%)	Indicative Affordable Housing Requirement Unit Number	Delivery timescale Year 1-5 (ST) Year 6-10 (MT) Year 11- 16 (LT)	<u>Expected</u> Units Beyond The Plan Period	Area Ha	Potential For Self Build Indicated By Site Promoter
HSG/086/LDP 2/5	Former Hubberston VC School, Hakin	Milford Haven	26	100%	26	<del>MT</del> <u>LT</u>	0	0.9	No
HSG/086/LDP 2/6	Former Hakin Junior School	Milford Haven	43	100%	43	LT	0	1.46	No
HSG/086/LDP 2/7	North East of Beaconsing, Steynton <u>N</u>	Milford Haven	14	Off-site contribution		<del>MT</del> <u>LT</u>	0	0.49	Yes
S/HSG/086/L DP2/3	South of Conway Drive, Castle Pill Road, Steynton (see policy GN 19B)	Milford Haven	117	15.4%	<del>47</del> <u>18</u>	LT	163	9.32	<del>No</del> <u>Yes</u>
HSG/095/001 44	North of Gibbas Way <u>N</u>	Pembroke	43	<del>25</del> <u>24.4</u> %	10	MT/LT	43	2.86	No
HSG/095/LDP 2/1	Between St Daniels Hill & Norgans Hill <u>N</u>	Pembroke	147	<del>25</del> <u>24.5</u> %	36	LT	0	4.9	Yes
HSG/095/LDP 2/2	South West of Southlands, St. Daniels Hill <u>N</u>	Pembroke	19	12.5%	2	LT	0	0.64	No
HSG/095/LDP 2/4	East of Golden Hill Road <u>N</u>	Pembroke	50	<del>20</del> <u>14</u> %	<del>40</del> <u>7</u>	MT/LT	0	1.68	No

HSG/095/LDP 2/5	South East of Southlands St.Daniels Hill <u>N</u>	Pembroke	26	15%	3	LT	0	0.87	Yes
LDP2 Reference	Site Name	Settlement	<u>Expected</u> Minimum Units In Plan Period	Indicative Affordable Housing Requirement Percentage (%)	Indicative Affordable Housing Requirement Unit Number	Delivery timescale Year 1-5 (ST) Year 6-10 (MT) Year 11-16 (LT)	<u>Expected</u> Units Beyond The Plan Period	Area Ha	Potential For Self Build Indicated By Site Promoter
HSG/096/002 38	North of Pembroke Road <u>N</u>	Pembroke Dock	38	Off-site contribution		MT/LT	<del>0</del> <u>7</u>	<del>1.52</del> <u>1.81</u>	Not Known
HSG/096/LDP 2/1	Land at Hampshire Drive <u>N</u>	Pembroke Dock	33	Off-site contribution		MT/LT	0	1.12	No
HSG/096/LDP 2/2	West of Stranraer Road <u>N</u>	Pembroke Dock	59	15.3%	<u>89</u>	LT	0	1.99	Yes
<u>HSG/096/LDP 2/3</u>	<u>Land south of Sycamore Woods and west of Lavinia Drive <u>N</u></u>	<u>Pembroke Dock</u>	<u>9</u>	<u>Off-site contribution</u>		<u>MT/LT</u>	<u>0</u>	<u>0.31</u>	<u>Yes</u>
S/HSG/034F/LDP2/1	Maesgwynne (see policy GN 19A)	Fishguard	175	10%	17	MT/LT	167	11.39	No
HSG/093/000 66	East of Poppy Drive <u>N</u>	Neyland	101	100%	101	MT/LT	0	3.39	No
HSG/088/LDP 2/1	West of Bloomfield Gardens and North of Adams Drive & Highfield Park <u>P N</u>	Narberth	89	40%	35	MT/LT	64	5.75	Yes
<b>Urban Settlements Total</b>			<del>1576</del> <del>15827</del> <u>1741</u>				<del>1117</del> <del>1124</del> <u>759</u>	<del>96.86</del> <del>97.54</del> <u>97.54</u>	
<b>Urban Settlements total as percentage of total allocations</b>			<del>67%</del> <del>66.6%</del> <u>68.54%</u>				<del>85%</del> <del>83.4%</del> <u>77.21%</u>	<del>68.3%</del> <del>67.68%</del> <u>67.68%</u>	

LDP2 Reference	Site Name	Settlement	Expected Minimum Units In Plan Period	Indicative Affordable Housing Requirement Percentage (%)	Indicative Affordable Housing Requirement Unit Number	Delivery timescale Year 1-5 (ST) Year 6-10 (MT) Year 11-16 (LT)	Expected Units Beyond The Plan Period	Area Ha	Potential For Self Build Indicated By Site Promoter
HSG/020/LDP 2/1	Land at Tan Ffynnon Fields <u>P*</u>	Cilgerran	50	17.58%	8	LT	40	3.95	No
HSG/030/LDP /01	East of Waunaeron	Crymych	28	Off-site contribution		LT	0	1.23	Yes
HSG/048/000 38	North of Hayston View <u>N</u>	Johnston	50	6.2%	3	<del>MT</del> /LT	42 63	4.01 4.96	Yes
HSG/048/LDP 2/1	Maes yr Ysgol <u>N</u>	Johnston	13	Off-site contribution		MT/LT	0	0.58	No
HSG/050/LDP 2/1	South of Rock Park <u>N</u>	Kilgetty	19	12.5%	2	MT/LT	0	0.85	Yes
HSG/052/000 11	South of Cleggars Park <u>N</u>	Lamphey	55	25%	13	MT/LT	0	2.43	Yes
HSG/052/LDP 2/1	Adjacent to Lamphey School <u>N</u>	Lamphey	40	20%	8	LT	0	1.75	No
HSG/053/LDP 2/1	Between Longstone Court and 62, St. Davids Road <u>P N*</u>	Letterston	38	Off-site contribution		LT	0	1.69	No
HSG/063/000 24	North of The Kilns <u>N</u>	Llangwm	66	15%	9	MT/ <del>LT</del>	0	2.89	Yes
HSG/122/000 35	Awel y Mor extension	St Dogmaels	28	Off-site contribution		LT	0	1.23	Not Known
<b>Service Centre Total</b>			<b>387</b>				<b>82 103</b>	<b>20.58 21.56</b>	

Service Centre Total as percentage of total allocations			<del>16.3%</del> <u>15.24%</u>				<del>6%</del> <u>7.6%</u> <u>10.48%</u>	<del>15%</del> <u>14.5%</u> <u>15%</u>	
LDP2 Reference	Site Name	Settlement	Expected Minimum Units In Plan Period	Indicative Affordable Housing Requirement Percentage (%)	Indicative Affordable Housing Requirement Unit Number	Delivery timescale Year 1-5 (ST) Year 6-10 (MT) Year 11-16 (LT)	Expected Units Beyond The Plan Period	Area Ha	Potential For Self Build Indicated By Site Promoter
HSG/003/LD P2/01	North of Begelly Farm <u>N</u>	Begelly	46	100%	46	<del>MT</del> /LT	0	2.58	Yes
HSG/006/000 03	Adjacent to Hafod <u>P</u>	Blaenffos	6	Off-site contribution		MT	9	0.93	No
HSG/022/LD P2/1	Land at Dungleddy Court <u>P N*</u>	Clarbeston Road	19	Off-site contribution		MT/LT	0	0.83	Yes
HSG/152/LDP 2/1	South of Bro'r Dderwen	Clunderwen	31	25%	7	LT	<del>34</del> <u>37</u>	2.71	No
HSG/029/000 14	Opposite Woodholm Close <u>N P</u>	Crundale	15	12.5%	1 (as an off-site contribution)	MT/LT	0	0.66	Yes
HSG/029/LDP 2/1	West of Ashford Park <u>P N</u>	Crundale	22	15%	3	MT/LT	18	1.77	Yes
HSG/043/LDP 2/1	Adjacent to Brackenhurst <u>N</u>	Hill Mountain	15	Off-site contribution		MT/LT	<del>11</del> <u>15</u>	<del>1.16</del> <u>1.35</u>	Yes
HSG/046/LDP 2/1	Land at West End Cottages <u>N</u>	Hundleton	14	12.5%	1 (as an off-site contribution)	LT	0	0.65	Yes
HSG/047/LDP 2/1	South of The Crown <u>N</u>	Jeffreyston	<del>8</del> <u>10</u>	Off-site contribution		LT	0	<del>0.42</del> <u>0.79</u>	Yes

HSG/049/LDP 2/1	East of Brookfield Close and West of Bridge Lane <u>P N</u>	Keeston	27	Off-site contribution		MT/LT	0	1.21	No
HSG/060/LDP 2/1	Adjacent to Maesybryn <u>P N *</u>	Llandissilio	26	100%	26	LT	17	1.9	No
HSG/066/LDP 2/1	East of Hazelbank <u>N</u>	Llanstadwell	10	Off-site contribution		LT	0	1.04	No
LDP2 Reference	Site Name	Settlement	<u>Expected</u> Minimum Units In Plan Period	Indicative Affordable Housing Requirement Percentage (%)	Indicative Affordable Housing Requirement Unit Number	Delivery timescale Year 1-5 (ST) Year 6-10 (MT) Year 11-16 (LT)	<u>Expected</u> Units Beyond The Plan Period	Area Ha	Potential For Self Build Indicated By Site Promoter
HSG/081/LDP 2/1	West of Globe Inn <u>P N *</u>	Maenclochog	15	<u>Off-site contribution 100%</u>	<del>15</del>	MT/LT	21	1.57	No
HSG/099/LDP 2/1	Land at Coppins Park	Pentlepoir	11	12.5%	1 (as an off-site contribution)	LT	0	0.49	Yes
HSG/113/LDP 2/01	South of Robeston Court <u>P N</u>	Robeston Wathen	5	Off-site contribution		<del>MT</del> <u>LT</u>	0	0.27	No
HSG/114/LDP /01	East of Pilgrim's Way	Roch	52	13%	4	<u>LT</u>	0	2.19	Not Known
HSG/119/LDP 2/1	Between Cornerways and Austalise <u>P N *</u>	Simpson Cross	18	Off-site contribution		MT/LT	0	0.8	Yes
HSG/120/000 18	North West of Wesley Way <u>P N</u>	Spittal	10	Off-site contribution		MT/LT	10	0.89	Not Known
HSG/123/LDP /01	North of Parsons Green	St Florence	20	30%	6	MT/LT	0	0.88	Yes

HSG/132/LDP 2/1	West of Kings Park Farm	Templeton	14	25%	3	LT	0	0.61	No
HSG/135/LDP 2/1	North of Bulford Road Bypass <u>N</u>	Tiers Cross	6	Off-site contribution		LT	0	0.28	Yes
HSG/149/LDP 2/1	Land at Ford Farm <u>P N</u> *	Wolfscastle	14	Off-site contribution		LT	0	0.61	No

<b>Service Village Total</b>	<u>404</u> <u>406</u> <u>412</u>					<u>117</u> <u>121</u>	<u>25.03</u> <u>25.01</u>	
<b>Service Village Total as a percentage of total allocations</b>	<u>17.1%</u> <u>16%</u>					<u>9%</u> <u>12%</u>	<u>17.2%</u> <u>17.35%</u>	
<b>Housing Allocation Total</b>	<u>2605</u> <u>2375</u> <u>2540</u>					<u>1075</u> <u>1348</u> <u>983</u>	<u>142</u> <u>144.11</u>	

Development will not be permitted that would result in an adverse effect on the integrity of sites of national nature conservation importance. Proposals where adverse effects on site integrity cannot be ruled out will not be supported. Of particular concern are sites where potentially nutrient issues may arise. Sites are annotated for phosphorous and/or nitrogen issues will require addressing under Policy 12A Water Quality and Protection of Water Resources (formerly Policy GN 47).

- 5.102 Minimum numbers of units identified for each site are indicative and based on an identified developable area (required green spaces including hedge row buffers have been excluded from the figure). Developers will be expected to demonstrate that they are providing a mix of housing types, to cater for changing patterns in household size in accordance with the information in the most recently published Local Housing Market Assessment (see policy GN 15 Housing Mix, Second Homes and short term lets, Space standards and requirements for Lifetime Home Standards).
- 5.103 An indicative requirement for affordable housing has been identified, based on testing of viability.
- 5.104 Where site owners have identified that they would support the development of a site for self-build and the site is suitable for such a development, the potential for this has been identified in the table.
- 5.105 Further information relating to the delivery of allocated development sites, including information on phasing, is included in the Development Sites and Infrastructure SPG.

## GN 17 Residential Commitments

Sites or phases of sites with a WwTW permit review programmed are suffixed with '\*\*' Sites requiring mitigation for phosphorous or nitrogen are suffixed 'P' or 'N' respectively.

DM Ref	Site Name	Settlement / Growth Zone	Site Total	Units under construction	Commitment Units Remaining in Plan period	Open Market Unit Number	Affordable Housing Unit Number	Delivery timescale Year 1-5 (ST), Year 6-10 (MT), Year 11-16 (LT)	Units beyond the Plan period	Area (ha)
040/00431	Scarrowscant	Haverfordwest	181	<u>9</u> <sub>0</sub>	0	0	0	ST/MT	0	<del>0.85</del> <sub>0</sub>
040/00397	141, Portfield	Haverfordwest	<del>20</del> <sub>21</sub>	<u>0</u> <sub>9</sub>	<del>20</del> <sub>18</sub>	<del>15</del> <sub>13</sub>	5	MT	0	<del>0.42</del> <u>0.34</u>
040/00077	<del>Area of land behind City Rd Kensington Gardens</del>	Haverfordwest	133	3	<u>2</u> <sub>5</sub>	5	0	ST/MT	44	<del>1.68</del> <u>1.63</u>
040/00373	Calvary Church <u>P</u> <u>N</u>	Haverfordwest	8	0	8	6	2	MT	0	0.16
040/00430	Snooker Club <u>N</u>	Haverfordwest	16	0	8	8	0	MT	8	0.06
040/00106	Brooklands Park	Haverfordwest	21	<u>0</u> <sub>4</sub>	18	13	5	ST/MT	0	0.72
040/00445	7, Dew Street	Haverfordwest	5	0	5	5	0	MT	0	0.02
086/00129	<del>Beaconing Drive Steynton Beaconing Field</del>	Milford Haven	81	<u>2</u> <sub>28</sub>	28	<del>30</del> <sub>28</sub>	0	ST/MT	0	<del>2.45</del> <u>1.87</u>
086/00223	Thornton Rd	Milford Haven	<del>10</del> <u>117</u>	<del>10</del> <sub>0</sub>	0	0	<del>10</del> <sub>0</sub>	ST/MT	0	<del>0.57</del> <u>0</u>
086/00377	Land at Milford Marina	Milford Haven	190	0	45	43	2	MT/LT	145	<del>23.12</del> <u>14.77</u>
086/00378	132 Robert Street	Milford Haven	8	0	8	8	0	MT	0	0.02

## PEMBROKESHIRE COUNTY COUNCIL DEPOSIT LOCAL DEVELOPMENT PLAN 2017 -2033

DM Ref	Site Name	Settlement / Growth Zone	Site Total	Units under construction	Commitment Units Remaining in Plan period	Open Market Unit Number	Affordable Housing Unit Number	Delivery timescale Year 1-5 (ST), Year 6-10 (MT), Year 11-16 (LT)	Units beyond the Plan period	Area (ha)
086/00381	<del>72-78</del> <u>70A- 80A</u> Charles Street	Milford Haven	<del>15</del> <u>24</u>	0	<del>15</del> <u>24</u>	0	<del>15</del> <u>24</u>	MT	0	0.09
086/00282	Woodlands <del>Park</del> <u>View</u>	Milford Haven	7	<del>0</del> <u>1</u>	<del>4</del> <u>1</u>	<del>4</del> <u>1</u>	0	ST/MT	0	<del>-0.31</del> <u>0.09</u>
096/00373	Imble Lane	Pembroke Dock	100	<del>30</del> <u>0</u>	<del>70</del> <u>0</u>	0	<del>100</del> <u>0</u>	MT	0	<del>3.58</del> <u>0</u>
096/00274	Land N of Cleddau Bridge Hotel <u>N</u>	Pembroke Dock	5	1	<del>2</del> <u>3</u>	3	0	MT	2	0.22
096/00375	Land N of Cleddau Bridge Hotel <u>N</u>	Pembroke Dock	14	0	7	7	0	MT/LT	7	0.92
096/00230	Hampshire Drive	Pembroke Dock	<del>6</del> <u>17</u>	2	<del>4</del> <u>2</u>	<del>6</del> <u>2</u>	0	ST/MT	0	<del>4</del> <u>0.41</u>
095/00147	Land adjacent to Long Mains and Monkton Priory	Pembroke	<del>208</del> <u>238</u>	0	70	70	0	MT/LT	138	7.45
095/00180	Green Haven, Monkton <u>N</u>	Pembroke	30	0	11	11	0	ST/MT	12	0.87
095/00240	Springfield <u>N</u>	Pembroke	5	0	2	2	0	ST/MT	0	0.15
034/00165	West of Clos-Y-Bigney	Fishguard	50	0	<del>50</del> <u>0</u>	0	<del>50</del> <u>0</u>	MT	0	<del>1.87</del> <u>0</u>
034/00165	Maesgwynne Farm Complex	Fishguard	5	<del>1</del> <u>0</u>	<del>2</del> <u>3</u>	3	0	MT	2	0.39
034/00099	Delfryn, Heol Penlan, Stop & Call	Goodwick	9	0	5	5	0	MT	4	0.26

DM Ref	Site Name	Settlement / Growth Zone	Site Total	Units under construction	Commitment Units Remaining in Plan period	Open Market Unit Number	Affordable Housing Unit Number	Delivery timescale Year 1-5 (ST), Year 6-10 (MT), Year 11-16 (LT)	Units beyond the Plan period	Area (ha)
034/00292	Main Street	Goodwick	26	<del>0</del> <u>2</u>	26	26	0	MT	0	1.02
088/00077	Rushacre Gardens <u>P N</u> *	Narberth	54	0	27	22	5	MT	27	2.35
088/00074	Dingle Farm <u>N</u>	Narberth	33	0	16	16	0	LT	17	1.22
088/00360	Old Narberth CP School	Narberth	11	0	<del>8</del> <u>0</u>	<del>8</del> <u>0</u>	0	ST/MT	0	<del>0.14</del> <u>0</u>
030/00043	Between the School and Station Road	Crymych	56	<del>0</del> <u>15</u>	<del>56</del> <u>15</u>	<del>0</del> <u>15</u>	<del>56</del> <u>0</u>	MT	0	<del>2.55</del> <u>1.1</u>
030/00019	Crug yr Efydd	Crymych	<del>26</del> <u>27</u>	<del>2</del> <u>0</u>	5	<del>5</del> <u>3</u>	2	ST/MT	0	<del>-0.37</del> <u>0.33</u>
048/00017	Pond Bridge Farm	Johnston	123	<del>14</del> <u>0</u>	<del>40</del> <u>39</u>	<del>54</del> <u>39</u>	0	ST/MT	0	<del>1.73</del> <u>1.16</u>
050/00043	Land to rear of Newton Hall	Kilgetty	19	<del>0</del> <u>6</u>	19	15	4	MT	0	0.98
053/00034	Parc Maen Hir	Letterston	26	0	<del>26</del> <u>0</u>	0	<del>26</del> <u>0</u>	MT	0	<del>0.78</del> <u>0</u>
053/00009	Phase 2, Court Meadow	Letterston	<del>27</del> <u>53</u>	<del>0</del> <u>2</u>	<del>27</del> <u>22</u>	<del>27</del> <u>22</u>	0	MT	26	<del>1.28</del> <u>1.19</u>

DM Ref	Site Name	Settlement / Growth Zone	Site Total	Units under construction	Commitment Units Remaining in Plan period	Open Market Unit Number	Affordable Housing Unit Number	Delivery timescale Year 1-5 (ST), Year 6-10 (MT), Year 11-16 (LT)	Units beyond the Plan period	Area (ha)
053/00052	Former Go Cart Track	Letterston	23	<del>2</del> <u>0</u>	<del>14</del> <u>4</u>	<del>13</del> <u>4</u>	0	ST/MT	11	<del>0.75</del> <u>0.57</u>
007/00047	Old Station Yard <u>P*</u>	Boncath	30	0	20	20	0	MT	10	1.34
003/00040	North of New Road <u>N</u>	Begelly	70	0	35	32	3	ST/MT	35	3.01
003/00025	Barley Park Close	Begelly	<del>26</del> <u>21</u>	<del>3</del> <u>5</u>	<del>17</del> <u>5</u>	<del>28</del> <u>5</u>	<del>2</del> <u>0</u>	ST/MT	0	<del>0.87</del> <u>0.46</u>
025/00028	South of Tinker's Fold <u>N</u>	Cosheston	6	<del>2</del> <u>1</u>	<del>4</del> <u>2</u>	<del>6</del> <u>2</u>	0	ST/MT	0	<del>0.69</del> <u>0.22</u>
028/00012	North of the Forge	<del>Croeseoch</del> <u>Croesgoch</u>	<del>22</del> <u>23</u>	0	<del>22</del> <u>23</u>	<del>22</del> <u>23</u>	0	ST/MT	0	0.82
029/00013	Dingle Lane <u>P N</u>	Crundale	40	0	1	1	0	ST/MT	0	0.29
029/00026	Woodholm Farm <u>P N</u>	Crundale	5	1	<del>2</del> <u>3</u>	3	0	LT	2	0.25
033/00035	South West of Eglwysrw School	Eglwysrw	23	<del>23</del> <u>0</u>	0	0	<del>23</del> <u>0</u>	MT	0	<del>1.23</del> <u>0</u>
035/00021	Poplar Meadow	Freystrop	7	1	<del>0</del> <u>1</u>	1	0	ST/MT	0	0.19

DM Ref	Site Name	Settlement / Growth Zone	Site Total	Units under construction	Commitment Units Remaining in Plan period	Open Market Unit Number	Affordable Housing Unit Number	Delivery timescale Year 1-5 (ST), Year 6-10 (MT), Year 11-16 (LT)	Units beyond the Plan period	Area (ha)
035/00030	Will Meadows	Freystrop	28	2	<del>14</del> 8	<del>13</del> 8	0	ST/MT	0	<del>2.34</del> 0.81
042/00013	North of Cartref	Hermon	15	0	8	8	0	ST/MT	7	0.78
044/00050	Leven Close <u>N</u>	Hook	13	0	1	1	0	ST/MT	0	0.1
044/00063	Cyfin Barn Farm <u>N</u>	Hook	11	<del>1</del> 0	3	<del>4</del> 3	0	ST/MT	0	<del>0.35</del> 0.29
044/00015	Harcourt Close <u>N</u>	Hook	40	<del>0</del> 9	<del>14</del> 28 9	<del>14</del> 28 9	0	MT	<del>14</del> 0	<del>0.88</del> 0.35
046/00015	Bowett Close	Hundleton	29	0	5	5	0	ST/MT	0	0.25
081/LDP/01	Ger Y Lein Fach	Maenclochog	13	0	2	2	0	ST/MT	0	0.43
081/LDP/01	Maes Roslyn <u>P</u> <u>N</u> *	Maenclochog	13	0	13	13	0	MT	0	0.51
085/00022	Parc Yr Odyn	Mathry	7	<del>1</del> 2	4	<del>5</del> 4	0	ST/MT	0	<del>0.3</del> 0.22
099/00045	Sycamore Close	Pentlepoir	6	0	<del>3</del> 0	<del>2</del> 0	<del>1</del> 0	ST/MT	0	<del>0.43</del> 0

DM Ref	Site Name	Settlement / Growth Zone	Site Total	Units under construction	Commitment Units Remaining in Plan period	Open Market Unit Number	Affordable Housing Unit Number	Delivery timescale Year 1-5 (ST), Year 6-10 (MT), Year 11-16 (LT)	Units beyond the Plan period	Area (ha)
015/00024	Cornfields Walk	Sageston	100	<del>30</del> <u>0</u>	0	<del>30</del> <u>0</u>	0	ST/MT	0	<del>0.85</del> <u>0</u>
015/00022	Sageston Fields <u>N</u>	Sageston	38	0	<del>7</del> <u>3</u>	<del>7</del> <u>3</u>	0	ST/MT	0	<del>0.75</del> <u>0.41</u>
119/LDP/01	East of Hill Lane	Simpson Cross	20	<del>0</del> <u>5</u>	<del>20</del> <u>8</u>	<del>16</del> <u>8</u>	<del>4</del> <u>0</u>	MT	0	<del>0.75</del> <u>0.47</u>
119/00028	Old Smithy Craft Centre	Simpson Cross	4	4	<del>0</del> <u>4</u>	4	0	MT	0	0.12
119/00030	Pembrokeshire Motor Museum	Simpson Cross	26	0	13	13	0	MT	13	1.27
123/00045	Ash Grove Gardens	St Florence	<del>14</del> <u>9</u>	<del>2</del> <u>0</u>	<del>3</del> <u>1</u>	<del>3</del> <u>1</u>	<del>2</del> <u>0</u>	ST/MT	0	<del>0.37</del> <u>0.09</u>
131/00021	Land adj Blaenffynnon Farm	Tegryn	30	1	13	<del>14</del> <u>13</u>	0	MT	12	1.53
<a href="#">154/00001</a>	<a href="#">Barnlake Point N</a>	<a href="#">Barnlake</a>	<del>22</del> <u>22</u>	<del>1</del> <u>1</u>	<del>11</del> <u>11</u>	<del>11</del> <u>11</u>	<del>0</del> <u>0</u>	<a href="#">MT/LT</a>	<del>11</del> <u>11</u>	<del>1.12</del> <u>1.12</u>
011/00011	Hawn Lake <u>N</u>	Burton	13	0	1	1	0	ST/MT	0	0.18
012/00004	Land to the S of Kiln Park <u>N</u>	Burton Ferry	<del>8</del> <u>7</u>	<del>1</del> <u>2</u>	<del>6</del> <u>4</u>	<del>7</del> <u>4</u>	0	ST/MT	0	<del>1.55</del> <u>0.99</u>

DM Ref	Site Name	Settlement / Growth Zone	Site Total	Units under construction	Commitment Units Remaining in Plan period	Open Market Unit Number	Affordable Housing Unit Number	Delivery timescale Year 1-5 (ST), Year 6-10 (MT), Year 11-16 (LT)	Units beyond the Plan period	Area (ha)
110/00015	Maes Elwyn John	Reynalton	7	1	1	<del>2</del> 1	0	ST/MT	0	<del>0.24</del> 0.14
125/00009	St Twynnells Farm	St Twynnells	5	<del>2</del> 1	<del>0</del> 1	<del>2</del> 1	0	ST/MT	3	<del>0.25</del> 0.24
000/01202	Bluebell Lane	Wolfsdale	7	<del>4</del> 0	<del>0</del> 3	<del>4</del> 3	0	ST/MT	<del>2</del> 0	0.32

Development will not be permitted that would result in an adverse effect on the integrity of sites of national nature conservation importance. Proposals where adverse effects on site integrity cannot be ruled out will not be supported. Of particular concern are sites where potentially nutrient issues may arise. Sites are annotated for phosphorous and/or 'nitrogen to denote where screening and appropriate assessment for the Local Development Plan has identified nutrient issues requiring addressing under Policy 12A Water Quality and Protection of Water Resources (formerly Policy GN 47).

5.106 The table above summarises the residential commitments already in place in the Plan area. The information provided includes the development monitoring reference number, site name, settlement and total dwellings to be provided. Further information is provided on dwellings under construction, dwellings remaining to be built, the split between open market and affordable units, the delivery timescale, dwellings expected to be completed beyond the Plan period and the site area.

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

The Slade Lane, Haverfordwest, residential allocation forms an element of a site that will be masterplanned to provide residential development, [providing a range of types, tenures and sizes of housing on site which might include community-led housing and self-build plots, a range of different types of](#) open space, a new primary school, school playing fields and other community facilities [\(if required\)](#), together with integrated proposals for [active and](#) sustainable travel.

The first two phases of the site, primarily for residential development, are being taken forward by Pobl housing association and much of remainder (although not all) is now owned by Welsh Government and will also be delivered for new housing along with other complementary land uses.

The size and complexity of this site requires a co-ordinated approach to be taken to its development, with a view to creating a high quality and well-designed environment for its future residents.

Welsh Government is leading on the preparation of a masterplan for the entire site, which it is hoped to take forward as Supplementary Planning Guidance to LDP 2 post plan adoption.

- 5.107 The ownership of much of the Slade Lane residential development sites changed in 2023. It is now partly in the ownership of Pobl (housing association) and partly in the ownership of Welsh Government. Some smaller elements of the site remain in private ownerships.
- 5.108 Pobl is intending to implement the initial phase of the residential proposal based largely on what has already been fully consented (with some minor variations). It is also likely to develop the proposals for the second phase of the residential proposal.
- 5.109 Welsh Government is the owner of much of the remainder of the site and has [indicated that it intends to commission](#) the preparation of a masterplan for the whole site, which will include residential elements and also other related development proposals, including public and amenity open space, sustainable drainage systems (SuDS), a new primary school including school playing fields, areas protected for their nature conservation value and all matters relating to sustainable access [and active travel](#).
- 5.110 One part of the site which remains in private ownership has already been consented for a separate 24 dwelling proposal (now largely completed). Land to the north may form a second phase to this, but at present it is unclear how access will be achieved and it is possible this may have to come from the Welsh Government land at a later date.

**GN 19A Maesgwynne, Fishguard S/HSG/034F/LDP2/1**

At Maesgwynne, the part of the site known as Parc Loktudi has been developed, but other parts of the site remain undeveloped. Recently, planning permission has been granted for a 50 home development on land adjacent to Clos-y-Bigney (also known as land North of Maesgwyn), this being a 100% affordable housing proposal being taken forward by the Wales and West Housing Association. A masterplan will be prepared for the remainder of the site, based on further residential development, together with public and amenity open space, sustainable drainage systems (SuDS), a buffer zone adjacent to the Maesgwynne Farm complex, areas protected for their nature conservation value and all matters relating to sustainable access. [Proposals for residential care accommodation and / or for a health centre / clinic within the site area will also be considered, their acceptability being subject to detailed consideration of conformity with Welsh Government policy on accessibility of services and to their being no significant adverse effect on the capacity of the site to deliver new homes.](#)

The size and complexity of the site requires a co-ordinated approach to be taken to its development, with a view to creating a high quality and well-designed scheme which is sensitive to its setting. Vehicular access into the site from the A.40 Trunk Road must accord with the requirements of the Trunk Road Authority.

Wales and West Housing Association has commissioned Asbri Planning Ltd to prepare a masterplan for the undeveloped parts of the site, which could form a basis for future planning applications and for LDP 2 Supplementary Planning Guidance following plan adoption.

- 5.111 The Wales and West Housing Association is now the lead organisation seeking to take forward the development of the remaining undeveloped parts of the Maesgwynne site. This site has previously been consented for residential development proposals, which were in part dependent on the creation of a roundabout junction onto the A.40 trunk road (although some discrete elements of the site have been able to move forward without this). The delivery of the remainder of the allocation is dependent upon the development of vehicular access proposals that meet the requirements of the Trunk Road Authority, who have power of direction on this matter at application stage.
- 5.112 Wales and West Housing Association is intending to implement the 50 dwelling affordable housing scheme in accordance with the consent already in place. Subsequent phases of the residential proposal will be masterplanned, will need to incorporate highway access proposals that are supported by the Trunk Road Authority and must make provision for public and amenity open space, SuDS, a buffer zone around the Maesgwynne Farm complex, which includes some Listed Buildings and protection of areas of nature conservation importance, including Maesgwyn Lane and related hedgerows and trees. The proposals must also make provision for sustainable access, including the access from the Trunk Road and site layout in general. [In the event that proposals to provide residential care accommodation and / or a health centre / clinic are accepted, in](#)

principle, for inclusion within the site, then these too should be incorporated into the masterplan.

### **GN 19B South of Conway Drive, Castle Pill Road, Steynton S/HSG/086/LDP2/3**

The Steynton area of Milford Haven has provided numerous new dwellings as a result of previously allocated housing sites and this plan has allocated four further housing allocations including this site. A masterplan for the strategic housing allocation known as south of Conway Drive is required to ensure pedestrian and cycling connectivity with these previous phases of development where possible, in addition to other neighbouring housing allocations listed in policy GN.16, namely HSG/086/LDP2/1 Land at Myrtle Meadows via Castle Pill Road and HSG/086/LDP2/2 East of Castle Pill Road.

The masterplan will need to incorporate recreational open space, sustainable drainage systems (SuDS), and an ecological buffer zone along the southern boundary in addition to walking and cycle routes to the north, west and southwest.

There will need to be at least two vehicular access points to the site to ensure emergency vehicles can access the site at all times, namely from Castle Pill Road and Neyland Road via Beaconing Drive, St Peter's Way and Hilton View. The vehicular accesses must be developed in consultation with the Trunk Road Agency and the Local Highway Authority. The number of dwellings that can be accessed via Castle Pill Road will need to be informed by a Traffic Assessment on the junction between Castle Pill Road and Steynton road (A4076 Trunk Road) as well as the adjoining four way signalised junction to the north.

The masterplan could form a basis for future planning applications and for LDP 2 Supplementary Planning Guidance following plan adoption.

5.113 The Steynton area of Milford Haven has seen significant housing growth over successive development plans. This site to the south of Conway Drive and Beaconing Drive will be the largest development to date, so a masterplan will be needed to ensure place making and connectivity with previous phases of development and other sites allocated for housing in this plan.

5.114 The site is positioned between Castle Pill Road and Neyland Road, via Beaconing Drive and St Peters Way. This presents a unique opportunity to create a walking and cycling route through the site to provide both a recreational through route to Castle Pill and an active travel route to other parts of Milford Haven, particularly the Secondary School and the Town Centre, via Mariners Way and housing allocation HSG/086/LDP2/1 Land at Myrtle Meadows, Steynton. This would avoid the currently circulatory route via Neyland Road and the A4076 (T) Steynton Road (in part) and reduce travel distances between different parts of Steynton, which are currently separated by Castle Pill Road. To achieve this, the masterplan will need to prioritise a shared user path on a west-east axis within the site layout and create a safe exit near the south-west corner onto Castle Pill Road, which also takes into account the point at which the neighbouring allocation on the opposite side will also junction with Castle Pill Road.

5.115 The road known as Castle Pill Road adjoins the wider road network at an un-signalised T-junction with the A4076(T) Steynton Road. This is less than 30m to the south of a 4-way signalised junction, which is the main vehicular entrance to the town of Milford Haven and to an extent the Dale peninsula. The Welsh Government Transport Division has stated that some vehicular traffic from the allocation can exit using Castle Pill Road and onto the A4076(T) Steynton Road. On this basis, the masterplan must be accompanied with a Traffic Assessment of the T-junction and 4-way signalised junction, as this will inform the number of dwellings that can exit onto Castle Pill Road and therefore will have an influence on the site layout.

### GN 20 Local Needs Affordable Housing

Local needs affordable housing will be sought on residential developments based on identified housing market areas. The housing market areas have been identified by analysing sales data for recent new builds across the local planning authority area.

Indicative targets for provision on allocated sites are set out in Policy GN 16 Residential Allocations and on unallocated sites the provision shall be as follows:

Size of site	1 unit	2-5 units	6-9 units	10-19 units	20-32 units	33-49 units	50-99 units	100+ units
Band 1	Commuted Sum	Commuted Sum						
Band 2		Commuted Sum					5%	17.5%
Band 3		Commuted Sum		12.5%	15%	20%	25%	30%
Band 4		Commuted Sum	25%	25%	30%	35%	40%	

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).

~~The authority may seek a higher percentage contribution on any site where local circumstances and/or recent developments in the area suggest it would be financially viable. Where a sustained positive change in the financial viability of development can be demonstrated through monitoring the local authority will seek a higher percentage contribution towards affordable housing.~~ The provision of affordable housing below the target figure may be appropriate in exceptional circumstances, where this is supported by economic viability evidence and it can be demonstrated that there have been significant changes to viability since the original viability testing of individual housing allocations and high-level residential viability testing for the Plan as a whole.

5.116 The need for affordable housing is acute in Pembrokeshire, evidenced by housing waiting list data, Local Housing Market Assessments and Community Council surveys. The Welsh Government has made the delivery of affordable housing a priority for the planning system, and a community's need for affordable housing is a material planning consideration. It is anticipated that at least 2000 new affordable homes will be provided over the Plan period.

- 5.117 The authority will seek a material or financial contribution to affordable housing from new open market housing developments (including those intended for use as self-catering accommodation) where applicable, in order to maximise the delivery of affordable housing in an effort to meet the existing and newly-arising need. Conversion proposals are excluded from such provisions on the basis of viability constraints. Where the site is large enough the developer will be expected to provide affordable housing on-site, in accordance with percentage targets stated in GN 16 (for housing allocations) or GN.20 above (for windfall sites). These targets are derived from housing viability tests and form an indicative target. The viability tests, conducted as evidence for the LDP, have regard to unique site characteristics and allow for changes to the state of the economy and the economics of development. In exceptional circumstances, where a developer can demonstrate that the expected percentage is not deliverable, they may negotiate with the LPA to ensure delivery of a reasonable number of affordable homes, which contribute to meeting the need for affordable homes in Pembrokeshire. The developer will be required to provide evidence of significant changes that have occurred since the original viability testing of individual housing allocations and the high-level residential viability testing for the Plan as a whole.
- 5.118 If on site provision is impractical, as it would result in less than 2 affordable units on a small-scale development or where through 'rounding' a large site is left with a fraction of an affordable dwelling to provide, the Council will seek a commuted sum contribution to support off site affordable housing provision.
- 5.119 The Authority will not accept piecemeal development of large sites, whether allocated or otherwise, as a means of avoiding the requirement for affordable housing. Affordable Housing SPG contains important details of tenure and type of affordable housing sought by the authority. It also establishes how the housing market areas may be adjusted and how a commuted sum will be applied. The affordable housing target in the SPG will generally be in line with the percentage identified for allocations within that settlement. This will be varied where an allocation has abnormal costs related to it, or where there are variations in house market areas within a settlement.
- 5.120 Data for sales of recent new build properties across the Local Planning Authority area was collected to identify areas of similar house price values, when converted into pounds per square metre (£psqm). Inflationary uplifts were applied to account for variations in timing of the sales and allowances were made for single storey bungalow development to avoid bias. These were then grouped together to create the below housing market areas:

Band 1

Area Name	Settlements
Cleddau Estuary East	Martletwy
Northeast	Abercych, Blaenffos, Boncath, Bwlch-y-Groes, Cyrmych, Eglwysrwr, Glandwr, Hermon, Llanfyrnach, Newchapel, Postgwyn, Rhoshill, Tegryn
North	Ableston, Castlemorris, Croescoch, Fishguard, Ffos Las, Goodwick, Hayscastle Cross, Letterston, Little Newcastle, Llandeloy, Llangolman, Llanrhian, Maenclochog, Mathry, Panteg, Penycwm, Penygroes Villas, Pont - yr – Hafod, Puncheston, <a href="#">Scleddau</a> , Square & Compass, St Nicholas, Trecwn, Treffynnon, Treffgarne, Trefgarn Owen, Walton East, Wolfscastle, Woodstock
Southwest	Johnston, Milford Haven (excluding Steynton), Rosemarket, Tiers Cross, Thornton

Band 2

Area Name	Settlements
Central	Camrose, Clarbeston Road, <a href="#">Cresselly</a> , Cuffern, Golden Hill, Jeffreyston, Keeston, Lampeter Velfrey, Leachpool, <a href="#">Llanddewi Velfrey</a> , Llandissilio, Llawhaden, Ludchurch, Pelcomb Cross, Poyston Cross, Princes Gate, Roch, Robeston Wathen, Simpson Cross, Spittal, Tavernspite, Whitland, Wiston, Wolfsdale
Cleddau Estuary North and West	Barnlake, Burton, Burton Ferry, Deerland, Freystrop, Hill Mountain, Hook, Houghton, Little Honeyborough, Llangwm, <a href="#">Llanstadwell</a> , Lower Freystrop, Madox Moor, Mascle Bridge, Milford Haven (Steynton area only), Neyland, Sardis, Waterston
Pembroke Dock area	Cosheston, Pembroke Dock, Slade Cross, Upper Nash.
Teifi Estuary	Bryngwyn, Cilgerran, Llwyncelyn, Pen-y-Bryn, St Dogmaels

Band 3

Area Name	Settlements
Clunderwen	Clunderwen
Haverfordwest area	Crundale, Haverfordwest/Merlins Bridge, Portfield Gate, Slade Villas, Uzmaston
Southern A477 corridor	Begelly, Broadmoor, Carew/Sageston, Cold Blow, East Williamston, Kilgetty, Llanteg/ <a href="#">Llanteglos</a> , Milton, New Inn, Pentlepoir, Pleasant Valley, Redberth, Reynalton, Stepside, Summerhill, <a href="#">Wiseman's Bridge</a>
Pembroke area	Hundleton, Lamphey, Maiden Wells, Pembroke, St Tywnells

Band 4

Area Name	Settlements
Narberth area	Narberth, Templeton
Southeast	New Hedges, Penally, St.Florence

### GN 21 Exception Sites for Local Needs Affordable Housing

Local needs affordable housing on land that would not otherwise be released for housing will be permitted in exceptional circumstances where the following criteria are met:

1. The site is within or immediately adjoining a Settlement Boundary;
2. A local need for affordable housing has been identified;
3. The community in which the site is located is adequately served with facilities to support the proposed development; and
4. All the benefits of affordable housing provision, built for the exclusive occupation of local people in need of affordable homes, will pass to the initial and all subsequent occupants.

5.121 Exception sites will be supported at locations with Settlement Boundaries. Where there is an identified need for affordable housing, which cannot be satisfied by existing provision, local needs affordable housing can be provided as an exception to normal planning policies. Evidence of need can be drawn from the Local Housing Market Assessment, Common Housing Register data and Community Council surveys. Any application for an exception site must be proportionate in scale and nature to the settlement in which it is located.

5.122 Further information is provided within national policy (See PPW 12 para 4.2.34).

5.123 It is expected that the majority of affordable housing will continue to be provided by Registered Social Landlords and the Council through its Housing Revenue Account build programme, but other local organisations such as self-build groups and community land trusts may also play a role in delivery provided that the dwellings remain affordable for local people into the future. Community Land Trusts (CLTs) range in size, can be rural or urban, and provide a variety of housing tenures as well as other community facilities, such as workspaces, energy generation, community food and farming. [Along with Charitable Trusts](#) they allow a form of community-led housing which holds land collectively in a not-for-profit trust and ensures affordability in perpetuity through a Section 106 agreement, tying the cost of houses to local income rather than to the property market. CLTs act as a long-term solution to ensure that people who genuinely need affordable housing have access to such housing by retaining an equitable interest in any homes sold.

## GN 22 Specialist and Supported Accommodation

New, or extensions to existing, specialist or supported accommodation will be permitted where ~~a need has been identified and when~~ the following criteria are met:

new criterion: A local need for such provision has been satisfactorily evidenced and supported by the local authority's Strategic Commissioning Team.

1. New facilities are within or ~~immediately adjoining well-related to~~ a Settlement Boundary, or involve the adaptation or conversion of an appropriate existing building
2. Extensions to existing buildings are of a scale and nature compatible with the original building and its location
3. In all instances access arrangements allow for the safe movement of pedestrians, cars, emergency, delivery and service vehicles

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

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

Market housing proposals will not be permitted outside settlement boundaries.

5.124 Pembrokeshire has an older population, with the 2021 Census recording that 48.4% of people in the County (including the National Park area) are aged 50 and over, with 12.1% aged 75 or over. 22% of the population are recorded as disabled under the Equality Act in 2021<sup>27</sup>. This policy aims to ensure that specialist and supported accommodation is provided to meet the needs set out within the 'Assessment of Specialist Housing and Accommodation Need for Older People in West Wales, November 2018' and 'Housing and accommodation needs assessment for people with learning disabilities in West Wales to 2037', 2018, and updated information in the latest Local Housing Market Assessment [2022-2023](#). Specialist and supported accommodation includes housing for older people, housing with care, residential care and nursing care. The following table shows the overall estimated net need for older people (shortfall in units/beds) to 2035. Many people living in specialist older persons housing will need accessible and wheelchair adapted homes. It is estimated that around a quarter of older people living in specialist housing will need wheelchair adapted homes. Specialist accommodation is also required to support people with learning disabilities, younger people, or people who are homeless or vulnerable. Whilst estimated levels of need are known for older people and people with learning disabilities, this policy will apply to all vulnerable groups where a need for the

<sup>27</sup> Pembrokeshire's Local Housing Market Assessment, 2022-3

development is accepted by the Council. [To ensure local need has been satisfactorily evidenced the planning authority will consult with the housing, social and health services on the appropriateness of proposals coming forward under this Policy \(and linked Policies dealing with allocations for housing, the development of community facilities and applying standards for how housing is laid out\) to ensure that the provision is meeting Pembrokeshire's strategic needs for accessible housing, supported and specialist housing.](#)

Figure 4 Estimate net need (shortfall in units/beds) to 203528

	Area 1 North West	Area 2 South West	Area 3 South East	Area 4 North East	Total
Housing for Older People	318	232	303	287	1140
<i>For rent</i>	191	163	151	172	677
<i>For sale</i>	127	70	151	115	463
Housing with Care	56	50	97	7	211
<i>For rent</i>	34	35	49	4	122
<i>For sale</i>	23	15	49	3	89
Residential Care	62	61	19	57	199
Nursing Care	109	180	25	128	443

5.125 The overall trend has been to shift care provision from institutional settings towards more independent housing that integrates housing and support for older people into the community. Housing should meet aspirational needs for all forms of housing for older people, where older people can stay close to friends and family, and the informal networks they provide and where their independence can be preserved.

5.126 The identified need can be provided through public or private facilities, and in all cases consideration will be given to how the development complements the character of the local area, protects the amenity of local residents, and provides opportunities for residents to access local facilities.

5.127 Accommodation for people with learning disabilities<sup>29</sup> currently accommodates 421 adults aged 18+ in Pembrokeshire. This population is estimated to grow to 473 by 2037. Predicted need is for an overall increased need for an additional 57 housing /accommodation units by 2027 and 119 by 2036 as follows –

Figure 5 Predicted Need for Accommodation for people with learning disabilities

Accommodation / housing type	Provision at 2017	Net requirement by 2027	Net additional requirement by 2037	Overall need

<sup>28</sup> [Assessment of Specialist Housing and Accommodation Need for Older People in West Wales, November 2018](#)

<sup>29</sup> [Housing and accommodation needs assessment for people with learning disabilities in West Wales, 2018](#)

Residential care places	92	76 places (- 16)	47 places (-29)	-45
Shared Lives placements	18	36 placements (+18)	57 placements +21)	+39
Supported housing / supported living arrangements	110	143 units (+33)	175 units (+32)	+65
Mainstream housing with care	56	62 units (+6)	71 units (+9)	+15
Overall need for Housing/ accommodation units	276	+57	+62	+119

5.128 Increased housing options for people with a learning disability, autism, or both is intended to enable access to the right accommodation with care and support provided to offer sustainable solutions. The aspiration is again to move away from institutional type care into more community focused solutions.

[New Paragraph: Proposals for the provision of children's homes must be located, designed, and equipped to meet the specific needs of the children for whom the service is intended \(Guidance for registering a care home for children October 2024\). As part of the location assessment service providers are required to consult the Strategic Commissioning Team in the local authority where the home will be located and consider publicly available local data, such as local crime statistics, consult with relevant local services, undertake a risk assessment, and develop risk management strategies. Care Inspectorate Wales will ask for evidence of these assessments having been carried out during the registration process. Ease of access to the local community and relevant facilities, such as education, health, employment, and leisure, as well as access to public transport must be taken into account. Where public transport is limited, the service provider must consider how they will facilitate community access. The Guidance also advises that children's attachment to, and inclusion in, their community is essential for their development of identity, security, and sense of belonging. Some children's care homes may have a rural or isolated location in line with the aims and objectives for the type of service they wish to provide, and for some children this might be a preferred option. However, for most children a well-connected care home which is integrated into the local community will have a positive impact on their well-being. The planning authority will consult with the Strategic Commissioning Team in the local authority on the justification provided for requiring a rural or isolated location where new build is proposed.](#)

**GN 23 Specialist and Supported Accommodation Allocations**

Land is allocated for additional specialist and supported accommodation facilities. at: Sites with issues regarding phosphorous or nitrogen are suffixed 'P' or 'N' respectively.

Site Reference	Site Name	Area (hectares)	Facility allocated
SSA/089/01	South west of Park House, Tenby	3.20	Extra care facility for older persons
SSA/089/LDP2/01	East of Park House, Tenby	0.25	Residential / Nursing facility extension.
SSA/135/LDP2/01	North of Bulford Road Bypass, Tiers Cross <u>N</u>	0.44	Older persons care facility / people with learning disabilities.
SSA/088/LDP2/01	Redstone, Narberth <u>P N</u>	1.97	Older persons care facility

Development will not be permitted that would result in an adverse effect on the integrity of sites of national nature conservation importance. Proposals where adverse effects on site integrity cannot be ruled out will not be supported. Of particular concern are sites where potentially nutrient issues may arise. Sites are annotated with the suffix 'P' for phosphorous and/or 'N' for nitrogen to denote where screening and appropriate assessment for the Local Development Plan has identified nutrient issues requiring addressing under Policy 12A Water Quality and Protection of Water Resources (formerly Policy GN 47).

5.129 As set out in Policy GN 22 there is substantial identified need in Pembrokeshire for Specialist and Supported Accommodation. The allocations identified in the Local Development Plan will contribute towards meeting this identified need.

### GN 24 Gypsy and Traveller Site Allocations

Land is allocated for extensions to the Gypsy and Traveller sites at ~~four~~three locations, each shown on the Proposals Map: Sites with issues regarding phosphorous or nitrogen are suffixed 'P' or 'N' respectively.

Site Reference	Site Name	Area (hectares)	Indicative net gain of pitch number
<del>GT/095/LDP2/01</del>	<del>Land to the east of Castle Quarry Gypsy and Traveller site, Monkton, Pembroke</del>	<del>0.35</del>	<del>4</del>
GT/003/LDP2/01	Land west of Kingsmoor Common Gypsy and Traveller site, Begelly <u>N</u>	0.58	11
GT/040/LDP2/01	Land east of Withybush Gypsy and Traveller site <u>P N</u>	<del>1.2</del> <u>1.088</u>	<del>205</del>
GT/095/LDP2/02	Adjacent to Monkton Playing Field <u>N</u>	2.43	<del>20-15+</del> (with potential for further pitches beyond the Plan period)

Indicative net gain of pitch numbers at the three sites: ~~55~~31 Development will not be permitted that would result in an adverse effect on the integrity of sites of national nature conservation importance. Proposals where adverse effects on site integrity cannot be ruled out will not be supported. Of particular concern are sites where potentially nutrient issues may arise. Sites are annotated with the suffix 'P' for phosphorous and/or 'N' for nitrogen to denote where screening and appropriate assessment for the Local Development Plan has identified nutrient issues requiring addressing under Policy 12A Water Quality and Protection of Water Resources (formerly Policy GN 47).

5.130 Land is identified to provide a net gain of ~~55~~31 pitches through the extension to the existing, well established Local Authority managed Gypsy and Traveller sites at ~~Castle Quarry, Monkton, Pembroke~~, Kingsmoor Common, Begelly and Withybush. In addition to these, a new site has been identified for such provision, at Monkton Playing Fields. Details on the delivery of the sites, including indicative costs, possible funding sources and expected timescales for

delivery has been included in the Development Sites and Infrastructure Supplementary Planning Guidance.

- 5.131 At ~~Castle Quarry and~~ Withybush, the extension of the sites may take place in conjunction with improvements to the existing sites. At Kingsmoor, a consented plot is likely to be needed to allow extension of the internal road layout. The site Adjacent to Monkton Playing Fields site will provide new pitches ~~and might also have potential for partial use as a transit site should such a need be identified.~~

### GN 25 Gypsy, Traveller and Show-people's Sites

Proposals for new permanent or transit Gypsy, Traveller and Show-people's sites or extensions to existing authorised sites outside Settlement Boundaries will be permitted where:

1. It has been demonstrated that, for new sites or pitches in the countryside, no suitable sites are available within Settlement Boundaries or at existing authorised and permitted sites; and
2. The site is sustainably located for access to existing community, social, education and other services; and
3. The site is sensitively sited within the landscape, including the historic environment; and
4. The site is appropriate in scale to the local community and would not have a significant adverse impact on local amenity or neighbouring uses.

Development will not be permitted that would result in an adverse effect on the integrity of sites of national nature conservation importance. Proposals where adverse effects on site integrity cannot be ruled out will not be supported. Of particular concern are sites where potentially nutrient issues may arise. Screening and appropriate assessment for the Local Development Plan has identified nutrient issues in certain locations within the Plan area requiring addressing under Policy 12A Water Quality and Protection of Water Resources (formerly Policy GN 47) .

5.132 Proposals for new Gypsy, Traveller and Show-people's Sites must be in accordance with advice in Welsh Government Circular 005/2018: Planning for Gypsy, Traveller and Show-people Sites, which will be a material consideration, as appropriate, in the determination of any planning applications. Settlement boundaries provide sequentially preferable locations for the development of Gypsy, Traveller and Show-people's sites and pitches. Outside Settlement Boundaries, applicants must demonstrate that there are no sequentially preferable sites within or closer to Settlement Boundaries. Proposals for new sites or extensions to existing authorised sites must have good access to services particularly primary schools and doctors surgeries by means other than the private car. Active travel routes and access to public transport will be key to deciding whether a site has good access to services and is in a sustainable, viable location for connection to services including water, waste water disposal and collection.

5.133 Sites will also be considered in context and in relation to the local infrastructure, population size and density to ensure they are in proportion to local settled communities. Site design must combine a layout which meets the needs of the inhabitants of the site, and sites developed by a public body, such as a Local Authority, should be designed in accordance with the Welsh

Government Guidance<sup>30</sup>. All proposals must satisfactorily mitigate the impact of the proposal on the landscape.

- 5.134 Additional material considerations include whether the proposal would contribute to any local need for Gypsy and Traveller accommodation identified within the Pembrokeshire Gypsy and Traveller Accommodation Assessment (GTAA 2019), or any subsequent updates. The 2019 GTAA identifies an additional need for 9 pitches between 2019 and 2024, which has numerically been met. Over the Plan period to 2033, this need is expected to rise to 39 pitches, however, due to planning permissions granted since 2019 and the site allocations proposed at the four sites listed in policy GN 24, this longer term outstanding need can numerically be met. There is, however, increased uncertainty over such long periods of time, and as there is a requirement to commence a review of the Gypsy Traveller Accommodation Assessment in 2024 will ensure that a more accurate assessment of need will be available once the review is completed (which it is anticipated will be in early 2027).
- 5.135 This policy seeks to enable the provision of culturally appropriate accommodation of static and touring caravans. Proposals for bricks and mortar accommodation at a Gypsy and Traveller site or pitch will be resisted as this would materially reduce the availability of culturally appropriate accommodation to the community.

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<sup>30</sup> 'Designing Gypsy and Traveller Sites' Welsh Government May 2015  
<https://gov.wales/designing-gypsy-and-traveller-sites>

### **GN 26 Telecommunications and Digital Technology Infrastructure**

Proposals for telecommunications and digital technology infrastructure will be permitted where:

1. The proposals will contribute towards future proofing of development and regeneration proposals, form part of the planned development of a wider network and / or will improve coverage in areas where provision is limited or absent;
2. Where feasible, the proposals take advantage of opportunities for sharing of masts and sites; and
3. Evidence is provided to demonstrate that the structure and location proposed has been selected to minimise environmental impacts and landscape intrusion, within the constraints of network requirements and technical feasibility.

5.136 Electronic communications are a critical element of modern-day life for people and for businesses. They ensure that people are connected to one another and to the businesses that provide them with services. There is an expectation that telecommunications will be reliable, fast, geographically inclusive and based on secure networks. Planning Policy Wales Edition 12 explains that Welsh Government has an objective to offer fast and reliable broadband to every property in Wales and to support the provision of mobile infrastructure throughout Wales.

5.137 In a Pembrokeshire context, broadband provision is improving and will continue to evolve with the roll-out of fibre broadband across the County. Mobile network coverage in the County has potential for improvement, as there are still locations with poor coverage and in a few cases no coverage at all.

5.138 The Swansea Bay City Deal's Internet Coast project will help to improve the provision of electronic communications infrastructure across SW Wales, including Pembrokeshire. The Draft National Development Framework notes that Mobile Action Zones will be identified across Wales, however the location of these has not yet been published.

5.139 Many aspects of electronic communications infrastructure benefit from permitted development rights, which mean that separate planning applications do not have to be made where certain types of network upgrade are proposed. Notwithstanding this, some aspects of infrastructure upgrade will require planning permission and Welsh Government therefore asks Local Planning Authorities to make an appropriate policy provision in their LDPs.

5.140 Pembrokeshire County Council has therefore prepared this criteria-based policy, which is of an enabling nature, subject to certain stipulations, including those relating to landscapes and townscapes, including potential impacts on National Park locations. Alongside this policy, Policy GN 1 General Development will be critical in assessing how all proposals impact on amenity

and landscape. Policy GN 28 Protection and Enhancement of the Historic Environment will also be an important consideration.

**GN 27: Broadband and Telecommunications on New Developments**

The Council will work with the telecommunications industry and the communications regulator Ofcom to maximise access to reliable super-fast gigabit capable broadband, reduce the number of wireless not-spots and improve mobile availability for all residents and businesses, assisting them (where appropriate) in delivering their investment plans to address any infrastructure deficiencies.

New major residential and employment developments must be served by a high speed and reliable gigabit capable broadband connection to the premises. Major residential developments are schemes for 10 or more dwellings and major employment developments are those on sites of 0.5 hectares or greater. Smaller residential and employment developments should provide access to the most viable high-speed connection available and if necessary make provision of additional ducting to facilitate future Fibre to the Premises (FTTP) installation or other similar provision where FTTP is not possible (for instance where satellite or wireless broadband systems are installed because copper or fibre cables cannot be used for technical and / or viability reasons).

For the smaller scale residential and employment developments, exceptions will be made where applicants have shown, through consultation with broadband infrastructure providers, that this would not be possible, practical or economically viable.

- 5.141 The policy seeks to reflect the demands of a modern Wales for reliable fast and high capacity communication networks. In this respect, it supports the Welsh Government's objective to offer fast and reliable broadband to every property in Wales and to support the deployment of mobile infrastructure across the country. It seeks to reflect the context of broadband infrastructure as an essential service, which can help support and develop the local economy as well as vibrant and inclusive communities.
- 5.142 BT Openreach and other providers offer cable-based superfast Fibre-to-the-Property (FTTP) broadband connection for all new developments. BT Openreach has already installed fibre connections from its exchanges to most roadside cabinets. However, while many existing users benefit from this, they may still rely on earlier copper-wire connections from cabinet to property. This is known as FTTC (Fibre-to-the-Cabinet) broadband. However, in some of Pembrokeshire's towns, FTTP is being made available by the telecommunications company Ogi. For new build housing and employment proposals, FTTC is not favoured, the preferred option being full FTTP. It is also recognised that there are other options available to achieve high speed broadband, which may for instance involve the 4G and emerging 5G mobile technology networks, fixed wireless connections via antennae, satellites or community broadband projects. Where 5G mobile technology is installed within roadside cabinets, this can be used to provide a link from cabinet to a router within a property, which doesn't rely on either copper-wire or fibre connections.

- On larger residential and employment development sites (as defined above), the connection may be provided free of charge, or as part of a co-funded partnership including community funded partnerships. The Council will expect all new dwellings on major residential sites to have FTTP installed from the outset. It will also expect FTTP on all new employment sites of 0.5 hectares and over unless there is compelling evidence that this cannot be achieved.
- On smaller residential and employment sites, the situation is more varied and FTTP may only be achieved where a developer pays for the infrastructure between the nearest fibre-enabled roadside cabinet and the development site.

5.143 In supporting the delivery of full fibre, BT Openreach has set UK wide targets, and provides guidance and support to developers in building full FTTP networks to new residential or mixed residential / commercial sites. BT Openreach is the main provider for the fibre network, but they are not the only providers. There is also another way in which fibre broadband is being brought into Pembrokeshire, which is by putting it into ducting that follows the Trunk Road network. That may provide a way to address some connectivity problems currently experienced, as part of a wider range of options.

5.144 As noted above, the policy also recognises that in a small proportion of cases, cable-based broadband will not be able to be provided to new developments. In these cases, it may be possible for satellite or wireless systems to be used to provide the broadband capability and that is an accepted alternative, subject to the providers being code regulated through Ofcom. Where there are no technically feasible and viable options, an exception to the policy approach will be made where a developer provides the Council with evidence that a high-speed broadband connection is not possible. That will normally take the form of correspondence with one of the broadband providers. The Council's Broadband Team will be consulted on those housing and employment planning applications where the applicant is either unwilling to provide the expected broadband connectivity and / or argues that viability considerations preclude this being achieved.

5.145 In urban areas, high-speed and reliable cable-based or satellite / wireless enabled broadband is in most cases already available. In the case of cable-based broadband, connections in urban areas are available to the cabinet (Fibre to the Cabinet or FTTC) but there had only been limited take-up of onward connection to properties by 2021. A fibre connection has, however, been installed in schools throughout Pembrokeshire. The provision of high-speed and reliable broadband within rural areas is patchier but where it can be achieved, it will assist in supporting the delivery of the Plan's strategy through providing additional opportunities for home working and more generally to boost the rural economy and economic diversification.

5.146 As noted above, in Pembrokeshire's principal towns, Fibre to the Property is being made available to existing residential properties by the Ogi company. At

present (2023) it is the only company that is installing FTTP to existing domestic properties in the County and is focusing its initial investment on the main urban centres.

## RESOURCEFUL COMMUNITIES GENERAL POLICIES

**GN 28 Protection and Enhancement of the Historic Environment**

Development will only be supported where it conserves, protects, preserves or enhances the following cultural and historic assets and their setting:

- a) Listed Buildings;
- b) Conservation Areas;
- c) Registered Historic Parks, Gardens and Landscapes; and
- d) Scheduled Ancient Monuments and Archaeological Remains.

5.147 The historic environment enhances quality of life, forging cultural identity and community cohesion and is a major asset to Pembrokeshire's visitor economy. This policy recognises the scale and significance of these assets within Pembrokeshire with the aim of ensuring their protection, preservation and enhancement.

5.148 Pembrokeshire has a rich and varied historic environment, made up of architectural, historical and archaeological features that are integral to its quality and distinctiveness. Areas and sites of national significance are protected by national policy, including Listed Buildings, Conservation Areas, Scheduled ~~Ancient~~ Monuments, Landscapes of Historic Interest and Historic Parks and Gardens. The Historic Environment (Wales) Act ~~2016~~ 2023 has introduced new measures for the positive management of change in the historic environment. It aims to:

- a) Give more effective protection to Listed Buildings and Scheduled ~~Ancient~~ Monuments;
- b) Improve the sustainable management of the historic environment; and
- c) Introduce greater transparency and accountability into decisions taken on the historic environment.

5.149 The Act is supported by Technical Advice Note 24: The Historic Environment, and a suite of guidance and advice that complements its objectives. All of these documents will form a key consideration in the determination of planning applications affecting assets within Pembrokeshire. Development that may detrimentally affect the character or integrity of such areas will not be permitted.

5.150 There are 1,649 Listed Buildings in Pembrokeshire County Council's planning area. When considering works to Listed Buildings, the emphasis must be on their sensitive repair and enhancement using traditional materials and techniques. Any works internally or externally to Listed Buildings, or within their curtilage areas, will only be supported where it is demonstrated that there will be no significant harm to their special historic or architectural significance and their setting. Demolition of Listed Buildings is not normally permitted.

5.151 There are 24 Conservation Areas in Pembrokeshire County Council's planning area. Proposals within Conservation Areas should seek to preserve or enhance their special character and appearance. In national planning policy there is a strong presumption against the granting of planning permission for development, including advertisements, which would damage the character or appearance of a Conservation Area or its setting to an unacceptable level. In addition to national policy, adopted Conservation Area Character Appraisals will be a material planning consideration when determining planning applications. The Council will continue to review its Conservation Areas and adopt new Character Area Appraisals and Management Plans.

5.152 Pembrokeshire County Council's planning area contains 20 Historic Parks and Gardens and 2 Historic Landscapes. Consideration will be given to the impact of development proposals on Registered Historic Parks and Gardens and Historic Landscapes, including their settings, when considering planning applications both within and near to these assets. Proposals that would have an adverse impact on the special qualities of these assets will not be supported.

5.153 There are 248 Scheduled ~~Ancient~~ Monuments within Pembrokeshire County Council's planning area. The Council will consult Welsh Government's Historic Environment Service (Cadw) on planning applications within the setting of a Scheduled Ancient Monument and which meet the set criteria that are detailed within the annex to the best practice guidance document 'Setting of Heritage Assets' (2017). Applications for works to A Scheduled ~~Ancient~~ Monument (known as applications for Scheduled Monument Consent) should be made directly to Cadw.

5.154 Not all archaeological remains meriting preservation will be Scheduled and the vast majority of archaeological sites will not be afforded any statutory protection. In assessing development that may affect archaeological remains the Council will take into account the following:

- i. Information on the character, extents and importance of the remains, including that in the Historic Environment Record (HER) [helped by Heneb – The Trust for Welsh Archaeology – Dyfed Region](#)~~helped by (insert successor organisation to the Dyfed Archaeological Trust);~~
- ii. The extent to which the proposed development is likely to have an impact upon them; and
- iii. The means of mitigating the effect of the proposed development, if necessary by redesign, to achieve physical preservation in situ.

5.155 The special qualities of the historic environment can be derived from numerous other factors in addition to those listed in formal designations, such as the form, scale or grouping of buildings; vistas and visual composition of the townscape/landscape; architectural detailing; building materials; trees and other landscape features. Many of these features make an important contribution to the character and appearance of local communities. Pembrokeshire's towns and villages contain many buildings that are of local importance, and which make a significant contribution to the character and quality of the local area. The Council

will seek to create and adopt a register of Historic Assets of Special Local Interest to support the inclusion of policies in the Local Development Plan at review stage. It will also roll forward and if necessary update the Historic Environment (Archaeology) SPG.

**GN 29 Community Facilities**

A The development of new community facilities will be permitted where proposals are located within or well related to the community they are intended to serve and are accessible by public transport, walking and cycling.

B Extension(s) or enhancements to existing community facilities will be permitted provided the facility is appropriately located to meet the needs of the community it is to serve or enhancements to accessibility are proposed.

C The change of use or loss of a community facility will only be permitted where:

1. It can be demonstrated that the continued use of the facility has been shown to be no longer viable and alternative solutions to support the long term use of the facility for the community have been adequately explored; and
2. The premises is vacant and has been actively marketed for its existing use for a minimum of six months; and
3. It can be demonstrated that the facility is surplus to the requirements of the community which remains served by well-located adequate alternative provision; or
4. A suitable replacement facility is to be made available.

5.156 The retention and improvement of community facilities contributes to the well-being of communities through a healthier Wales and a Wales of cohesive communities (Well-being of Future generations (Wales) Act 2015) and is supported where they are sustainably located to serve the local community.

5.157 The loss of community facilities is not permitted unless there is adequate alternative provision which is well located to serve the local community and which is accessible by public transport, walking and cycling. In some cases, community facilities will be no longer viable and in such cases it should be demonstrated that alternative options to enable the community facility to continue to operate have been explored. This could include community ownership schemes.

5.158 Community facilities are services and facilities which are locally orientated and predominantly serve the local community. They support the social, health or economic well-being of the area and provide opportunities for social interaction between people.

5.159 For the purposes of this policy, community facilities include community halls, centres and meeting places, community-based theatre venues, community learning and educational facilities, leisure centres, libraries and youth centres, religious facilities and places of worship, local and village shops, post offices, play grounds and sports facilities, public houses, allotments, healthcare and health facilities, rural petrol filling stations and launderettes.

**GN 30 Community Facility Allocations**

The following sites are allocated for community facilities: Sites or phases of sites with a WwTW permit review programmed are suffixed with ‘\*’ Sites requiring mitigation for phosphorous or nitrogen are suffixed ‘P’ or ‘N’ respectively

Site Reference	Site Name	Proposed Use	Area (ha)
CF/040/01	New Primary School, Slade Lane, Haverfordwest <u>P N</u>	Primary School	Subject to the outcome of the Master-planning of the site.
CF/086/LDP2/01	New Primary and Secondary Schools, Milford Haven	New build primary and secondary schools on the existing Secondary School site	15.01

Development will not be permitted that would result in an adverse effect on the integrity of statutorily designated sites of national importance for nature conservation. Proposals where adverse effects on site integrity cannot be ruled out will not be supported. Of particular concern are sites where potentially nutrient issues may arise. Sites are annotated for phosphorous and/or ‘nitrogen to denote where screening and appropriate assessment for the Local Development Plan has identified nutrient issues requiring addressing under Policy 12A Water Quality and Protection of Water Resources (formerly Policy GN 47). To further address nutrient issues sites dependant on WwTW permit reviews are also highlighted and must be phased as set out in Policy 12A.

5.160 The sites above have been identified in order to address a shortfall of provision in educational facilities within the Plan area.

### GN 31 Town Centre and Local Retail Centre Development

A. Within defined Town Centres, development will be permitted for the following land uses:

In a Primary Frontage: A1, A2, A3, D1 or D2 use with no residential use on the ground floor permitted, but residential use on upper floors accepted; and

In a Secondary Frontage: A1, A2, A3, D1, D2 and B1 use. Residential use on a ground floor will be considered on a case-by-case basis and will be accepted on the upper floors.

Elsewhere within Town Centres, a greater mix of uses will be permitted.

Additionally:

- In all Town Centre locations, development proposals for retail, commercial and / or community uses which enhance the vitality and viability of town centres and which are compatible with regeneration strategies will generally be supported;
- In all Town Centre locations, development proposals will be expected to retain any surviving historic shopfronts;
- In [Primary and Secondary Frontage areas all Town Centre locations](#), development proposals will not be supported where they will create or contribute to an unacceptable concentration of fast-food takeaways.

B. Within Local Retail Centres, proposals for commercial or community uses, which are well related to existing facilities, accessible by a range of travel modes, including walking, cycling and / or public transport and that are of a scale that is compatible with the role and function of the Local Retail Centre will be supported.

5.161 Non A1, A2 and A3 uses outside Primary Retail Frontages and residential development on the upper floors of buildings in Town Centres and Local Retail Centres will be encouraged subject to compatibility with other policies in the plan. Changes of use to non-A1, A2 or A3 on the ground floor outside Primary Retail Frontages but within a Town Centre will only be permitted:

1) If for residential purposes: a) where the premises / floorspace has been vacant for at least one year and has been actively marketed over that time; and b) where the premises / floorspace does not form part of a purpose-built retail environment or a continuous frontage of three or more existing commercial units.

2) If for other purposes: a) the proposal does not involve the loss of existing A1 floorspace and b) wherever possible, proposals for a change of use of existing floorspace are designed so as not to prejudice a future conversion back to a retail or commercial use.

- 5.162 As expressed above, the Council's aim is to increase the vitality and viability of the retailing and commercial centres in the Pembrokeshire. This policy therefore actively encourages residential developments on the first and upper floors in Primary, Secondary Frontage Retail and elsewhere in Town Centres, as part of mixed-use developments. Incorporation of residential uses can promote a greater sense of community with more people living in commercial centres, reduce private vehicle reliance, enhance civic pride, promote safer centres, increase local commuter spending and attract more businesses into centres via the locally resident, skilled workforce.
- 5.163 The policy also recognises that, in some older centres, the prospects of attracting new commercial development (A1, A2 and A3 uses) are limited. Under these circumstances, there is a need to adopt a more flexible and pragmatic approach whilst also promoting the benefit of bringing empty units and upper floors back into active use. In most of the Local Centres, the commercial centres are interspersed with residential development, and indeed, many of the shops were once private dwelling houses that have been converted. The Council would be concerned if, under these circumstances, shops remained vacant for a considerable length of time, leading to a deterioration of their condition and to the detriment of the local environment. It is therefore considered appropriate to develop criteria by which retail units outside of the Primary Frontage shopping areas can be converted to more viable uses such as residential. In these circumstances, it would need to be demonstrated that the property has been actively marketed for at least one year prior to the submission of an application. The Council will need to be satisfied that marketing has been undertaken on reasonable terms and, as a minimum, would require sales particulars and information from sales / letting agents to be submitted as part of an application.
- 5.164 The balance and distribution of non-A1 uses can have a significant effect on the retail role of Retail Frontages and complementary uses, including cafes and restaurants will be supported where they do not cumulatively undermine the retail character and role of a Retail Frontage. Considerations will include whether the use would enhance the vitality and viability of the centre and the well-being of residents and visitors, provide an active shopfront during normal shopping hours, reduce long term vacancy and contribute to a sense of place.
- 5.165 Concentrations of units operating solely as fast food take-aways are unlikely to support the well-being of residents or visitors. The well-being of residents and visitors includes their mental and physical health and is intended to support the well-being goal of 'a healthier Wales' by ensuring that such uses do not become over-concentrated within [Primary Retail Frontages Town Centres. No more than 33% of shop units within the Town Centre; no more than 33% of frontage length of Primary Retail Frontages; and no more than 3 consecutive units within the Town Centre should be in sole fast-food takeaway use.](#)
- 5.166 Primary Retail Frontages establish the core commercial areas of town centres, and whilst ensuring that opportunities remain for shops to establish in core areas, recognise that changes to shopping habits and technology mean that

town centres must seek new roles and encourage a wider range of uses in order to maintain vital and viable places for communities, visitors and workers. Co-working hubs can make an important contribution to the vitality of centres and will be supported. There are town and local centres which have higher than national average vacancy rates for commercial properties. In some cases, the authority will seek to manage the decline of such centres by allowing commercial property at the periphery of town centres and which is not within a Primary Retail Frontage to be released into residential use. This approach would help to manage the decline of some centres and introduce residential use in sustainable locations. The conversion of retail units often leads to the fragmentation of commercial frontages but this is considered preferable to long term vacancies and voids. The use of Primary Retail Frontages will help to combat this. Nonetheless, these have to be kept in balance so that the very purpose of retailing and commercial centres is not diluted unduly. Although activities falling within Class B1 are by definition acceptable in residential areas in terms of their environmental standards, the Council will not permit such uses which would result in the loss of existing retail A1. Such uses may be successfully accommodated above ground floor level in primary shopping frontages and in non-retail premises elsewhere in established commercial centres

5.167 The South-West Wales Regional Retail Study Feb 2017 identified that there is no need to allocate for additional convenience retail floorspace within Pembrokeshire. No allocations are therefore made for food stores.

5.168 The study identifies that there is capacity for comparison goods floorspace and the following table identifies the need anticipated for each main town up to the end of the Plan period, taking into account existing commitments. There is less certainty about the level of need over such a long period of time, and since need up to 2031 is less than 1,000 sq m (0.1Ha) net, this is not allocated within the plan. It is anticipated that need will be taken up through redevelopment opportunities within centres, and in accordance with national planning policy.

Figure 6 Comparison Floorspace Need.

Retail Centre	Net floorspace capacity – comparison goods sq. m (Ha)	
	By year 2031	By year 2036
Haverfordwest	735 sq m	2,916sq m
Milford Haven	-	-
Pembroke	137	217
Pembroke Dock	330	713
Fishguard	172	273
Narberth	-	-

The need identified is square metres net and assumes a net / gross ratio of 70%.

5.169 Some of the Town Centre areas are also in flood risk zones and in these locations the provisions of policy GN 1 (General Development Policy) (criterion 8) will need to be taken into consideration when assessing development proposals.

**GN 32 Out-of-Centre Retail and Commercial Development**

To ensure that retail and commercial development is appropriately located and does not undermine the retail hierarchy set out at SP 16 'Retail Hierarchy', retail and commercial developments outside defined centres will only be permitted where:

1. No sequentially preferable sites are suitable and available; and
2. A quantitative or qualitative need has been demonstrated; and
3. The impact of the proposal would not, either by itself or in combination with permitted or allocated retail developments, undermine the vitality or viability of retail centres
4. If located at a local retail centre proposals are of a scale and nature compatible with the role and function of the centre.

This policy does not apply to community facilities located within the community it is seeking to serve (see policy GN 29 Community Facilities) or proposals which implement up-to-date Regeneration Strategies endorsed by the authority.

5.170 This policy seeks to implement the Welsh Government's centres first approach for retail and commercial development. All proposals for uses, including retail and complementary uses, should demonstrate a sequential approach to site selection where sites and premises within town centres are considered first, followed by edge-of-centre locations and finally out of centre locations. Centres forming part of the sequential test should be agreed with the authority prior to submission of any planning application. Retail and all other uses complementary to retail and commercial centres include financial and professional services, food and drink, offices, hotels, educational and other non-residential establishments, leisure, launderettes and theatres. Some educational, healthcare and community uses should however be located close to the communities they serve. A key consideration will be the proposals acceptability under GN 1 'General Development Policy'.

5.171 A proportionate approach will be taken to the demonstration of need and impact. Major retail and commercial developments are considered to be proposals above 500 sq. metres net additional floorspace either within a single proposal or where cumulative proposals have come forward since the initial development. Major retail and commercial developments will be required to demonstrate that there is a need for the proposal. Where a need is identified (either quantitative or qualitative), then a Retail Impact Assessment will be required. For proposals of less than 500 sq. metres, developers must demonstrate that there will not be a significant impact on similar stores within nearby centres, and that there is a need for the proposal.

5.172 Development proposals outside Town Centres and Local Retail Centres that would result in the loss of retail and commercial floorspace will only be permitted where there is proven to be sufficient alternative provision locally or where the

premises / floorspace has been vacant for at least 12 months and has been actively marketed over that time.

5.173 In applying the sequential test for non-Town Centre retail proposals, the greatest weight will be given to the impact on the nearest defined Town Centre(s), and then after that to edge-of-centre retail areas, out-of-centre but within settlement retail areas and then those retail activities taking place on industrial estates linked to the nearest settlements.

## TACKLING RURALITY GENERAL POLICIES

**GN 33 Farm Diversification**

Diversifying the range of economic activities on a working farm will be permitted where the following criteria are met:

1. The proposed use helps to support the continued agricultural operation of the farm;
2. If a new building is justified it should be sited in or adjacent to an existing group of buildings whenever possible; and
3. If a retail use is proposed the scale and scope will not harm the vitality and viability of retail facilities in any nearby settlements.

5.174 Future Wales strongly supports the foundational economy of a region, which in a rural County such as Pembrokeshire heavily involves rural businesses. The well-being of places, communities and people is dependent on a resilient local economy and therefore it is important to sustain economic activity in rural communities whilst protecting the character of the landscape and its linguistic culture. Planning Policy Wales encourages a constructive approach towards agricultural development proposals, especially those which are designed to meet the needs of changing farming practices or are necessary to achieve compliance with new environmental, hygiene or welfare legislation. Diversification can help strengthen the rural economy, bringing additional employment and prosperity to communities.

5.175 This policy aims to support farm diversification as a means of sustaining the long-term viability of farming in Pembrokeshire. Some schemes may require the provision of new buildings and others development in the countryside, such activities are likely to have less impact on an area if they can be accommodated in existing buildings preferably located within close proximity to the farm holding. Where appropriate a planning condition will be imposed, or a planning obligation secured by agreement, to ensure that the development remains part of the agricultural unit. Effects on the character of the area, on residential amenity or on nearby small-scale retail facilities by reason of the development's scale, nature, operation, noise from traffic generation, will need to be carefully considered. In terms of farm shops planning conditions may be applied to limit the range and source of goods which can be sold from the premises and to ensure the net retailing floor space is appropriate.

5.176 Government planning policy advises that farm diversification is an economic diversification proposal on a working farm which is subject to planning control. A working farm is one which is involved in the husbandry of land or animals as a means of gaining income. Farm diversification proposals offer supplementary income thereby helping to sustain the viability of a farm and may include livestock and crop processing, tourism projects, farm shops, and making and

selling non-agricultural products. Diversification can also include renewable energy proposals such as anaerobic digestion facilities or solar and wind installations, which will help to increase the viability of rural enterprises by reducing energy costs (these are dealt with under Policy GN 4 Resource Efficiency and Renewable and Low-Carbon Energy Proposals). When a farm diversification proposal is submitted the applicant should provide additional information to justify the proposal. A brief explanation of some or all of the following will be expected:

- The farm's history;
- The need for new buildings and why existing ones are not suitable; and
- The relationship between the farming activity and the proposed diversification or any longer term needs for expansion.

5.177 The scale of development will also form a key consideration in determining the compatibility of proposals with the locality, with those deemed inappropriate to a countryside location being directed to employment sites provided for in the Plan. If evidence demonstrates that a farm is no longer a working farm or the proposal to diversify would in effect result in the business no longer being a working farm, then the proposal will be treated against the other employment policies of the Plan and the Plan's conversion policies as appropriate.

### **GN 34 Conversion or Change of Use of Traditional Buildings and the Expansion of, or Alterations to, Previously Converted Traditional Buildings outside Settlement Boundaries**

A The renovation, conversion or change of use of traditional buildings outside any Settlement Boundary will be permitted, provided the following criteria are met:

1. For employment related activities (excluding holiday accommodation):
  - a) The building is physically capable of accommodating the new use and any associated requirements without extensive alteration or extension; and
  - b) Outside storage, new services, access works, fences, walls or other structures associated with the use of the building or its curtilage can be provided, without harming the landscape setting; and
  - c) Conversion proposals respect the landscape and local building styles and materials.
2. For residential use, holiday accommodation or live-work units:
  - a) The building is traditional in nature and character; and
  - b) The building is physically capable of accommodating the new use and any associated requirements without extensive alteration, expansion or rebuilding; and
  - c) Any necessary alterations are kept to a minimum, can be carried out without adversely affecting the character of the building or its setting, and are in matching and/or sympathetic materials and respect the surrounding landscape; and
  - d) Outside storage, new services, access works, fences, walls or other structures associated with the use of the building and its curtilage can be provided, without harming the landscape setting or the character of the building.

B The expansion or alteration of a traditional building that has previously been converted to employment use, residential use, holiday accommodation or live work units will be permitted, provided the following criteria are met:

- a) The expansion or alteration is of a modest scale, remains ancillary to the main building and can be carried out without adversely affecting the character of the building or its setting, and
- b) It is constructed using matching and/or sympathetic materials and is of a scale and nature that is acceptable in landscape capacity terms and is capable of delivering environmental enhancements.

5.178 Many parts of Pembrokeshire are strongly rural and as such there are many traditional buildings outside Settlement Boundaries whose character and appearance contribute significantly to the County's distinctive landscape, history and sense of place. Planning Policy Wales and Technical Advice Notes 6 (Planning for Sustainable Rural Communities) and 23 (Economic Development)

encourage a positive approach to the conversion of rural buildings for business re-use. This policy enables the re-use of such buildings in appropriate circumstances and distinguishes between instances where they may be converted to employment use, and where it may be acceptable for more traditional buildings to be converted to residential or holiday accommodation or live work units, all of which can support the local economy and help retain cultural assets which may not be viable to retain otherwise.

5.179 Applications for conversion (change of use and adaptation) should avoid the introduction or intensification of uses which would be detrimental to the amenity of an area. Proposals for the re-use of a complex of buildings or an individual building with a large aggregate floor area must deal with the complex as a whole and not seek piecemeal development. The impact of the development on the vitality and viability of nearby settlements will also be a relevant consideration.

5.180 There will be circumstances where a building cannot be converted because it is too small for the use proposed. Likewise, conversion may not be possible because the use itself, or the alterations / extensions necessary to accommodate that use will adversely affect the building's character. In some instances the need to protect the character will require that the outside of the building is not altered or extended to accommodate a new use. In such instances permitted development rights will often be removed as a condition of the permission, to protect the building.

5.181 TAN 23 recognises that LPAs may wish to prioritise proposals for employment over residential use. This policy recognises the economic, cultural and social benefits of allowing traditional buildings to be converted to either use in appropriate circumstances thus supporting the rural economy. When considering the conversion of buildings to residential uses, or live-work unit(s), the building must be traditional in character and domestic in scale, structurally sound, of permanent and substantial construction and capable of conversion without major or complete reconstruction.

5.182 Traditional agricultural buildings are defined as:

- Those constructed of locally produced materials, the use of which is longstanding in the area, (normally implying walls of locally dressed stone or of clom construction, but may also include brick buildings);
- Those which generally reflect the original use in the building (in many such cases design will complement the original purpose); and
- Those which are substantially in their original form (although buildings where an original thatched roof has been replaced with a later slate or corrugated metal roof may be regarded as traditional). Such buildings will generally be of some considerable age, most being pre-1949 in origin.

5.183 There are circumstances where the full-time residential use of a conversion would be inappropriate because of its provision of a reduced standard of living conditions in terms of low level of privacy or amenity provision. In these

situations holiday occupancy conditions, limiting the time a single household may stay in a unit and return by, may be applied.

- 5.184 The expansion or alteration of a traditional building outside a Settlement Boundary that has previously been converted must be sympathetic to its scale and traditional character. In cases where the building has been extended or altered as part of the conversion or at a later date, any further extension or alteration must consider the combined impact on the character of the building. In some cases, it will not be appropriate to have multiple extensions due to the detrimental impact this would have on the scale, traditional character and historic use of the original building.

**GN 35 Marinas**

Proposals for new, extended or re-designed marinas will be permitted where the following criteria are met:

- 1 The proposals are located within or adjoining an existing settlement;
- 2 The proposals would not have a significant detrimental impact on the landscape character, the coast or on important townscapes;
- 3 Ancillary proposals will not undermine the vitality or viability of facilities and services in existing settlements; and
- 4 The proposals would not conflict with the sustainable management of the coast.

5.185 Welsh Government policy, as set out in Planning Policy Wales, Edition 12, says that development should not normally be proposed in coastal locations, unless it needs to be on the coast. It adds that undeveloped coastal areas will rarely be the most appropriate location for development.

5.186 In Pembrokeshire, much of the coastline is located within the Pembrokeshire Coast National Park and hence is outside the jurisdiction of this Plan. However, there are some parts of coast that are within the Council's planning area, including a small area of land east of Amroth, land in the Fishguard and Goodwick area, including that adjoining Fishguard Harbour and significant sections of the Milford Haven Waterway and the Daugleddau, including land at and around Milford Haven and Pembroke Dock towns.

5.187 The marine areas adjoining Pembrokeshire, including the Haven Waterway, are of great importance for nature conservation and many locations are also of landscape significance, including all those in the National Park. The Pembrokeshire coast is also experiencing changes as a consequence of climate change, which is contributing to rising sea levels and to increasing frequency of extreme weather events.

5.188 Notwithstanding the above, Welsh Government recognises the important contribution that marinas make to the visitor economy of Wales (Welsh Assembly Government Coastal Tourism Strategy, 2008). A supply of berths and associated services, at intervals around the Welsh coast, is seen as being desirable to facilitate maritime leisure travel.

5.189 A criteria-based policy has been prepared to enable new marinas to be developed in appropriate locations. Marina locations will be expected to relate well to an existing settlement because of their scale and nature, with proposals along the undeveloped coast being unacceptable. Marinas provide developed, permanent, floating and land-based, year-round facilities and the best location for these is often within existing ports, harbours and coastal towns. Ancillary developments such as restaurants, shops, toilet facilities, chandlery businesses, boat storage, car parking and housing are often required to support the social vibrancy and economic viability of marinas. These also favour developed

locations, where they will not compromise important landscapes or areas protected for their nature conservation value. Such proposals will be acceptable where it is demonstrated that they will complement and not undermine the vitality and viability of facilities in the existing centres. Good quality road access is also required, to facilitate landward servicing.

- 5.190 GN 41 Protection of National Statutory Environmental Designations will be particularly relevant to any marina proposals with potential to impact on important nature conservation sites. In particular this refers to the Pembrokeshire Marine SAC, the Cardigan Bay SAC and the Carmarthen Bay and Estuaries European Marine Site. Marina proposals are sometimes outside planning jurisdiction, which normally finishes at the Mean Low Water Mark (although there is an exception around Pembroke Dock, where that jurisdiction extends to the mid channel marker). However, most proposals will have landward implications for access and service provision, which will fall within Local Planning Authority jurisdiction. These aspects of development proposals will frequently require Environmental Impact Assessment. Some such projects may also require Habitats Regulations Assessment. Many aspects of marina proposals will additionally require consideration under other consenting regimes.
- 5.191 In evaluating marina proposals, account should also be taken of the policies and proposals of the relevant Shoreline Management Plans (SMPs). There are two SMPs affecting the coastal areas around Pembrokeshire and details of their provisions are hosted on Pembrokeshire County Council's website.

### GN 36 Transport Routes and Improvements

- A. Improvements to the transport network (new or improved major and minor roads, rail network improvements, cycleways, multi-use / shared use paths, sites for park and ride schemes and roadside service areas) will be permitted where:
1. The choice of route and / or site minimises the impact on the built and natural environment, landscapes and property; and
  2. Permanent land-take is kept to the minimum that is consistent with good design and high quality landscaping; and
  3. In the case of roads, cycleways, multi-use / shared use paths and park and ride, the scheme will help to improve road safety; and
  4. In the case of roads, a full range of practicable solutions to the transport problem has been considered and road enhancement provides the optimum solution; and
  5. In the case of roadside service areas, the scheme must adjoin the strategic road network, focus primarily on serving motorists' and other travellers' needs, not impede the movement of strategic traffic and not undermine the retail provision in town centres, local centres or villages.
- B. The following transport routes and improvements will be safeguarded from development that would be likely to prejudice their implementation:

Sites with issues regarding phosphorous or nitrogen are suffixed 'P' or 'N' respectively.

Reference	Scheme Type	Scheme Name	Location
TS/LDP2/03	Road & Footpath	Well Hill improvement, Pembroke <u>N</u>	Well Hill - Pembroke
TS/LDP2/04	Public Transport Interchange	Milford Haven public transport interchange	Milford Haven Train Station
TS/LDP2/05	Public Transport Interchange	Haverfordwest public transport interchange <u>P N</u>	Haverfordwest Train Station
TS/LDP2/08	Public Transport Interchange	Haverfordwest public transport interchange	Haverfordwest Bus Station

Development will not be permitted that would result in an adverse effect on the integrity of sites of national nature conservation importance. Proposals where adverse effects on site integrity cannot be ruled out will not be supported. Of particular concern are sites where potentially nutrient issues may arise. Sites are annotated with the suffix 'P' for phosphorous and/or 'N' for nitrogen to denote where screening and appropriate assessment for the Local Development Plan has identified nutrient issues requiring addressing under Policy 12A Water Quality and Protection of Water Resources (formerly Policy GN 47).

5.192 This policy has two elements. The first is to provide a criteria-based approach for the evaluation of new transport schemes. The second is to identify the main

proposals in the Plan area for improvements to the transport network and, wherever the routes for these are known, to safeguard them from other developments that might compromise their implementation.

- 5.193 The identified transport schemes include those programmed by Welsh Government, national transport network providers and, at a local level, by the County Council. As well as being programmed, the schemes identified are those which have a funding mechanism identified and that are likely to be implemented during the Plan period. Wherever known, the safeguarded routes / sites are shown on the Proposals Map. Appendix 4 to this Plan sets out the programming details for the identified schemes.
- 5.194 A key source of information for the programming is the Joint Transport Plan for South-West Wales for 2015 to 2020 (JTP). This was prepared in partnership by Carmarthenshire County Council, Neath Port Talbot County Borough Council, City and County of Swansea and Pembrokeshire County Council. Where it is known that details in the JTP have changed since publication, appropriate updates have been made.
- 5.195 A Wales Transport Strategy has been prepared by Welsh Government, this providing a strategic policy framework for transport throughout Wales to 2030. Guidance to Local Authorities will follow on preparation of Joint Transport Plans, set in the context of this Strategy document. This will provide a basis for review of the current Joint Transport Plan for South-West Wales.
- 5.196 The proposals safeguarded by this Plan should be viewed in conjunction with Figure 3, which identifies the key transport routes to support the transport policies and defines a strategic road network, in accordance with the requirements of Technical Advice Note (Wales) 18 on Transport and also reflecting the provisions of the Joint Transport Plan for South-West Wales and the principles underpinning Active Travel.
- 5.197 It is not appropriate for this Plan to identify aspirational proposals where there is no certainty of implementation within the Plan period. Nor can it safeguard the routes of any transport proposals whose implementation is not anticipated within the Plan period.
- 5.198 DCWW advises that there may be locations where the safeguarded routes pass over public sewers and water mains. Under the Water Industry Act, 1991, DCWW has rights to access its apparatus at all times. Therefore, protection measures in respect of these assets will be required, either in the form of an easement width or possibly a diversion of the asset. DCWW welcomes early engagement on such matters.

### GN 37 Working of Minerals

Proposals for the working of non-energy minerals, for the extension of existing mineral working sites, and for temporary borrow pits, will be permitted where:

1. The mineral is required to supply an identified need which cannot be supplied from secondary or recycled materials or from existing reserves;
2. The scale of the development is appropriate to serve the local market and a suitable proportion of the regional market;
3. In the case of former mineral working sites, there is no adverse impact on land which has been satisfactorily restored and the proposal makes a valuable contribution to the character of the local landscape and local environment; and
4. There is provision made for landscaping, groundwater protection, a beneficial after-use, restoration and post-closure management of the site, including the progressive restoration of sites where appropriate.

Proposals for working of energy minerals will be determined in accordance with Welsh planning policy and guidance.

The following site is allocated for the future extraction of non-energy minerals:

Site reference	Site name	Mineral	Area (hectares)
MN/000/LDP2/001	Trefigin Quarry extension	Sand & Gravel	9.30

For sand and gravel, if the allocated site is unable to provide fully for future needs, the Areas of Search for sand and gravel defined on the Proposals Map will provide a focus to encourage future interest from mineral operators.

5.199 Welsh Government's minerals policies are set out in Planning Policy Wales edition 12 and in a series of Minerals Technical Advice Notes. These, together with the Regional Technical Statement for Aggregates 2nd Review 2020 (RTS) provide the context for the policies and proposals in this Plan. As noted in the reasoned justification to policy SP 18 (Non-Energy Minerals), there is a sub-regional requirement to find new sites for terrestrial sand and gravel production in the RTS's West Wales sub-region, as well as a long-term objective to cease minerals production in the Pembrokeshire Coast National Park. Pembrokeshire County Council is working with its neighbouring Local Planning Authorities in Ceredigion, the Pembrokeshire Coast National Park and Carmarthenshire on a Statement of Sub-Regional Collaboration for minerals, which seeks to address this issue. The RTS 2<sup>nd</sup> Review also identifies a very small requirement for Pembrokeshire County Council to make new provision for hard rock quarrying over the Plan period, but notes that this is of so small a scale as to not require an allocation. In fact, new consents issued since the RTS 2<sup>nd</sup> Review was published largely meet the small deficit in future provision.

- 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.
- 5.201 All minerals development proposals must meet the requirements of policy GN 1 (General Development Policy). That policy makes reference, amongst other things, to soils (criterion 4) and at mineral extraction sites there is often potential to store soil for eventual re-use at the site-restoration stage (post-extraction), but there is a possibility of degradation during the interim storage phase.
- 5.202 Local Planning Authorities (except in National Parks) are required to maintain landbanks for hard rock (sometimes also referred to as crushed rock) and for sand and gravel. Hard rock is normally land-won, but sand and gravel can be land-won or marine-won.
- 5.203 This Plan takes a joint reserve approach for hard rock, combining PCC and PCNPA resources, perpetuating the existing arrangement. Special consideration may need to be given to sources of high-specification aggregates for use in road surfacing, construction and maintenance and to the size of the landbank for limestone.
- 5.204 A south-west Wales sub-regional provision is taken for sand and gravel, to reflect the requirements of the RTS 2<sup>nd</sup> Review, which advocates a collaborative approach with regard to ensuring future supplies of these materials. At the start of the LDP review process, a Statement of Common Ground was prepared by Pembrokeshire, Carmarthenshire and Ceredigion County Councils and the Pembrokeshire Coast National Park Authority, with regard to sand and gravel. More recently, in the context provided by the RTS 2<sup>nd</sup> Review requirements, the same four authorities have commenced preparation of a Statement of Sub-Regional Collaboration for minerals for the West Wales sub-region. This will cover hard rock (crushed rock) and sand and gravel, but the focus is very much on the latter, as sub-regional supplies of land-won sand and gravel are limited.
- 5.205 The end-date for this Plan is 2033 and therefore the landbank requirement will need to be sufficient to last until 2043 for hard rock (crushed rock) and 2040 for sand and gravel.
- 5.206 There is a long-term intention to remove minerals production from the Pembrokeshire Coast National Park, where there is current production of both hard rock and land-won sand and gravel. Current consents will allow minerals production in the National Park to continue for some time into the future. However, new minerals consents in the National Park will only be issued in very exceptional circumstances.
- 5.207 There is a consequential need to find alternative terrestrial production sites for hard rock and for sand and gravel, to replace those in the National Park. For hard rock, these will be found elsewhere in Pembrokeshire (possibly supplemented by resources elsewhere in the West Wales sub-region), where the hard rock landbank is of sufficient size to allow this to happen. For sand and gravel, there is no current production in the part of Pembrokeshire outside the

National Park, although there are resources that might be capable of economic extraction in the remainder of Pembrokeshire and perhaps also in neighbouring counties in the West Wales sub-region (Ceredigion and Carmarthenshire).

- 5.208 A sand and gravel allocation is made in the Plan, to contribute to the regional need.
- 5.209 Some of the sand and gravel resources coming into south-west Wales are marine-won. In Pembrokeshire, there is a sand and gravel wharf at Pembroke Dock, at which are landed materials dredged from the outer Bristol Channel. This wharf is safeguarded by this Plan for its current use through the provisions of policy GN 38.
- 5.210 A minerals background paper has been published, which provides information that has informed the preparation of the minerals policies of this Plan. The publication of the RTS 2<sup>nd</sup> Review in September 2020 post-dates this and its provisions have also been taken into consideration in framing the minerals policies of this Plan. The preparation of the Statement of Sub-Regional Collaboration for West Wales, arising from the RTS 2<sup>nd</sup> Review requirements, has also provided a context for the policies and proposals of this Plan.
- 5.211 There are two dormant minerals sites in the Council's planning area (although only one is recorded in the RTS 2<sup>nd</sup> Review). There has been no indication, through Candidate Site submissions, of an intention to commence quarrying at either. Hence, they are not allocated for minerals developments by this Plan and are not offset against the requirements for future working. The serving of Mineral Prohibition Orders will be considered in each case.
- 5.212 This policy is set in the context of the paragraphs above, the Minerals Background Paper, the RTS 2<sup>nd</sup> Review and the Statement of Sub-Regional Collaboration for the West Wales sub-region and has two elements. The first provides a basis for consideration of applications seeking permission for extraction on non-energy minerals, specifically hard rock (crushed rock) and sand and gravel. This element of the policy also covers extension proposals at existing working sites and proposals for borrow pits, these being temporary quarries opened up on a short-term basis to meet a specific need for the mineral concerned.
- 5.213 The second element of the policy allocates a specific site for the extraction of non-energy minerals. The allocation is for the extraction of sand and gravel. There is an acknowledged shortfall in provision of terrestrial sand and gravel extraction sites in the West Wales sub-region and the allocation of this site will provide a new opportunity to meet needs arising within Pembrokeshire and in adjoining Counties in the sub-region.
- 5.214 Priority is given to the use of recycled and secondary aggregates and development of new sources of supply will only be permitted where it can be demonstrated that no practicable substitute material can be provided at less environmental cost.

- 5.215 Criterion 4 of the policy references a number of important considerations where new mineral working is proposed. These are landscaping, groundwater protection, ensuring a beneficial after-use, restoration and post-closure management of the site, including the progressive restoration of sites where appropriate. There is further information on restoration and aftercare of sites in the Minerals Background Paper.
- 5.216 The Minerals Background Paper also includes a paragraph explaining the importance of transportation considerations in assessing mineral proposals. Wherever feasible, transportation by rail or water is preferred. Where road transport is the only realistic option, then a Traffic Impact Assessment is likely to be required to accompany a minerals planning application.
- 5.217 Surface and groundwater supplies should continue to be protected where quarrying of minerals is proposed. Consideration needs to be given to the potential implications of licencing requirements for quarry de-watering when preparing quarrying proposals.
- 5.218 There is no current working of energy minerals in Pembrokeshire and no Candidate Sites have been received proposing such a use. The Council has therefore not included a policy in this Plan relating to energy minerals. Should an application for such use be received, the Council will rely on Welsh Government's policy on this matter.

### GN 38 Safeguarding and Prior Extraction of the Mineral Resource

Known mineral resources of hard rock (including sandstone, limestone, shale and various igneous rocks) and sand and gravel are safeguarded as shown on the proposals map.

New development will only be permitted in an area of known mineral resource where it has first been demonstrated that:

1. Any reserves of minerals can be economically extracted prior to the commencement of the development; or
2. Extraction would **not** have an unacceptable impact on environmental or amenity considerations; or
3. The development would have no significant impact on the possible working of the resource by reason of its nature or size; or
4. The resource in question is of poor quality / quantity.

The Sand and Gravel Wharf at Pembroke Dock is also safeguarded to ensure its ongoing availability for that purpose and is shown on the proposals map.

5.219 The Council uses the British Geological Survey (BGS) 2012 minerals safeguarding maps as a basis for safeguarding the economic mineral resource of the Plan area. The safeguarded area excludes settlements, which are defined by Settlement Boundaries for the purposes of preparing this Plan. There is no longer a requirement to safeguard the coal resource, so for this Plan the safeguarding relates to the hard rock resource and the sand and gravel resource of the Plan area. The sand and gravel wharf at Pembroke Dock is also safeguarded, to ensure that it remains available for the landing of marine-dredged sand and gravel to serve local markets in SW Wales.

5.220 There is little prospect of extraction of coal being economically viable in the foreseeable future and the resource in Pembrokeshire is also unlikely to be required to supply speciality industrial markets. In that context, and in the absence of any Candidate Sites for coal extraction, the coal resource of the Plan area is no longer safeguarded. A further consideration in reaching this decision is that burning of coal to produce heat would conflict with Welsh policy to achieve low-carbon and eventually zero-carbon aspirations. The Welsh Government's Coal Policy Statement of March 2021 confirms their intention 'to bring to a managed end the extraction and use of coal'.

5.221 Prior extraction of the mineral resource may be required where another type of development is proposed on a safeguarded mineral site. This relates to shallow deposits beneath the site. However, the market demand for the material will be a factor in determining whether prior extraction is feasible. Environmental factors may also be an important consideration on whether to go ahead with prior extraction. It may, for instance, be desirable to retain on-site features of a site, including trees, hedgebanks, soils, together with the species and habitats that

they support. Where sites are protected for their nature conservation importance, prior extraction will not be sought – indeed, it is highly unlikely that any form of mineral extraction would be permitted in such circumstances.

5.222 The Council will prepare Supplementary Planning Guidance on prior extraction requirements, taking account of the matters set out in the paragraph above together with the nature and size of the development proposal.

5.223 There are very few LDP allocations within the safeguarded mineral resource. In the rare instances in which they do occur, they will take precedence over the safeguarding requirement. In these cases, prior extraction of the mineral resource will be required where it is appropriate for this to happen.

5.224 The Good Practice Guidance on this topic prepared for LDP 1 will be revised and re-published for LDP 2.

### **GN 39 Secondary Aggregates and Recycled Waste Minerals**

Proposals to use secondary aggregates and recycled waste minerals (including the use of construction materials arising from demolition) will be permitted where the following criteria are met:

- 1 The scale of the operation is appropriate to the area in which the source material is found;
- 2 Where a single site is proposed to deal with waste arising from more than one location, that site is, wherever possible, well located in relation to source materials;
- 3 The waste and secondary aggregates products will be transported by rail or water, wherever this is feasible; and
- 4 There is provision for landscaping, groundwater protection, beneficial after-use, restoration and post-closure management of the site, including wherever possible, details of progressive restoration of the site.

5.225 Welsh planning policy makes it clear that, where available, use of secondary aggregates and recycled waste minerals is preferable to the extraction of primary land-won or marine-dredged aggregates.

5.226 Significant quantities of secondary aggregate material is potentially available at sites in south Wales, particularly Aberthaw in the Vale of Glamorgan. What happens at that site and at other major industrial sites in south Wales in the future will be an important consideration in a secondary aggregates context across south and west Wales. However, these sites are generally not particularly close to Pembrokeshire and the cost of processing and transporting the material for re-use will be an important consideration.

5.227 There are some local recycled aggregate producers and secondary aggregate producers in Pembrokeshire, but these are of a small scale in comparison to sites like Aberthaw. However, they may make a local contribution to supply of aggregates. The local sites are listed in an Appendix to the Minerals Background Paper, the information being derived from the latest South Wales Regional Aggregates Working Party annual report.

### GN 40 Buffer Zones Around Mineral Sites

New mineral extraction and new sensitive development will not normally be permitted within Buffer Zones around mineral working sites, where such uses would potentially have an adverse impact on one another because of their close proximity.

- 5.228 There is a continuing need to protect existing terrestrial quarry sites and also those using nearby land for other purposes. To achieve this, quarry buffer zones have been established. Such zones are placed around all operational and dormant minerals sites and around allocated sites, at which production has yet to commence. Should Minerals Prohibition Orders be confirmed at the dormant sites, the quarry buffer zones would cease to have effect. The buffer zones have been amended to reflect changes to quarry boundaries approved since adoption of LDP 1 and are shown on the Proposals Map.
- 5.229 The current use of the sand and gravel wharf at Pembroke Dock is also protected, in accordance with Welsh policy.
- 5.230 The reasons for using Quarry Buffer Zones are set out in more detail in the Minerals Background Paper. This explains that within these zones, there should be no new mineral extraction or new sensitive development, although some types of less sensitive development may be possible. There is an exception to this general approach where the site of the new development in relation to the minerals operation is within or on the far side of an existing built up area that already encroaches on the buffer zone.
- 5.231 The minimum distances for quarry buffer zones are recorded in Welsh Government's Minerals Technical Advice Note 1 - Aggregates. For sand and gravel quarries it is 100m and for hard rock quarries it is 200m. There are no active or dormant coal workings in the Plan area. The buffer zones also take account of:
- The size, type and location of the workings;
  - The topography of the surrounding area;
  - Existing and anticipated levels of noise and dust;
  - Current and predicted vibration from blasting operations and availability of mitigation measures; and
  - The mineral being extracted and the nature of the operation.

## PROTECTING OUR ENVIRONMENT GENERAL POLICIES

### GN 41 Protection of National Statutory Environmental Designations

Development in Pembrokeshire's statutorily designated sites of national importance will be strictly controlled in order to protect the important features of the designation. National Statutory Designations comprise of: Special Areas of Conservation (SACs) and Special Protection Areas (SPAs), which form part of the National Site Network; Sites of Special Scientific Interest; RAMSAR Sites and National Nature Reserves.

Development proposals within National Statutory Designations must demonstrate there would be no adverse effect on the integrity of the species or features for which a site has been designated and

1. The proposal is directly connected with, or necessary for the protection, enhancement and positive management of the sites for conservation purposes; or
2. The development proposal is of a minor scale and is considered necessary to secure the role of the designation as a living landscape.

An appropriate zone of influence for national statutory designations will be used to ensure that development is assessed for its likely impact on the protected features or species of the statutory protected site. Development will not be permitted that would result in an adverse effect on the integrity of sites of national nature conservation importance. Proposals where adverse effects on site integrity cannot be ruled out will not be supported.

In exceptional circumstances, where there is no alternative solution and which must be carried out for imperative reasons of overriding public interest (IROPI), development may be authorised notwithstanding a negative assessment of the implications, subject to notifying Welsh Ministers.

Proposals likely to have a direct or indirect adverse effect on Special Areas of Conservation (SACs), Special Protection Areas (SPAs) will be subject to a Habitats Regulation Assessment (HRA).

5.232 This policy seeks to protect statutorily designated sites of national importance. Sites of Special Scientific Interest (SSSIs) and National Nature Reserves (NNRs) are protected under the Wildlife and Countryside Act 1981, as amended by the Countryside and Rights of Way (CROW) Act 2000, the Natural Environment and Rural Communities (NERC) Act 2006 and the Environment (Wales) Act 2016. There are no RAMSAR Sites in Pembrokeshire. The National Site Network comprises of: Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). Within SACs and SPAs development will only be permitted where it demonstrates compliance with the Conservation of Habitats and Species Regulations 2017, and The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (and any subsequent amendments).

5.233 Where development is proposed which may have an effect on a national designated site, sufficient information will be required from applicants to enable a full assessment of the likely impact on the protected site and demonstrate there

would be no adverse effect on the integrity of the species or features for which a site has been designated. The need for such an assessment will not be limited to development located within the designated area.

- 5.234 Proposals which are necessary for the protection, enhancement and positive management of the designated site may be acceptable and may include; the provision of public access or active travel routes, or proposals to deliver educational awareness (See PPW, Chapter 6).
- 5.235 Planning Policy Wales (Chapter 6) sets out development which may be necessary to secure its role as a living landscape. Proposals necessary to secure the role of the living landscape may include;
- agricultural development for new barns, slurry stores required to reduce pollution or barn conversions to support tourism
  - Alterations or extensions to existing dwellings
  - Alterations or extensions to buildings on employment site
- 5.236 Where development proposals may be likely to result in disturbance or harm to a statutory protected site or its habitat, additional information will be requested from applicants. Further information is contained in Technical Advice Note 5: Nature Conservation.
- 5.237 If planning permission is granted, it may be subject to appropriate conditions, management agreements or planning obligations which are considered necessary to secure appropriate protection, monitoring, mitigation or compensation and favourable management.
- 5.238 **Habitats Regulation Assessment** -Within the National Site Network, which includes: Special Areas of Conservation (SACs) and Special Protection Areas (SPAs), development will only be permitted which demonstrates compliance with the Conservation of Habitats and Species Regulations 2017, and The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (and any subsequent amendments).
- 5.239 Proposals likely to have a direct or indirect adverse effect on Special Areas of Conservation (SACs), Special Protection Areas (SPAs) or Ramsar sites must be subject to Habitats Regulation Assessment (HRA). Development requiring HRA will only be permitted where it can be determined that the proposal would not result in adverse effects on the species or integrity of the habitat or site, either alone, or in combination with other plans or projects.
- 5.240 Proposals may also be permitted where the HRA proves there are no alternatives, and that the development is of overriding public interest (IROPI) and appropriate compensatory measures are secured.

### GN 42 Protection of Local Nature Reserves (LNR), Regionally Important Geodiversity Sites (RIGS) and Peat Deposits

Development proposals that would affect Local Nature Reserves, ~~and Regionally Important Geodiversity Sites~~ ~~and areas of Peat Deposits~~ will only be permitted where it can be demonstrated that:

- 1 The proposal will conserve and where possible enhance the natural environmental importance of the site; or
- 2 The development could not reasonably be located elsewhere, and the benefits of the development outweigh the environmental or heritage importance of the site and any harm likely to be caused to it.

In all cases, development proposals must not cause any significant loss of habitats or populations of species, locally or nationally, and must provide net benefits for biodiversity. Mitigation and/or compensation measures will need to be agreed where adverse effects are unavoidable.

Peatland is an irreplaceable resource and considerable weight should be given to protecting it. If peat is identified within a proposed development it will be necessary to refuse permission unless other significant material considerations indicate otherwise.

5.241 LNRs (shown on the Constraints Map) are areas of local importance to nature conservation, many of these sites are managed by the West Wales Wildlife Trust. These sites provide a valuable contribution to biodiversity, the local environment and amenity. RIGS are designated by Geoconservation Cymru – Wales and are also shown on the Constraints Map. These sites are identified for their geological importance due to scientific, educational, historic and aesthetic features of the site.

5.242 In circumstances where it can be demonstrated that the need for a development might outweigh the need to protect a particular site, then impact will be avoided, minimised, and mitigated as far as possible through careful design, work scheduling or other measures (in accordance with the step-wise approach in PPW, chapter 6). Where residual impacts remain, measures will be put in place to ensure that alternative wildlife habitat provision or habitat creation is provided to ensure that there is no net loss in overall conservation value of the area or feature. Where appropriate, the authority will consider the use of conditions and/or planning obligations to provide appropriate mitigation and/or compensation measures. Opportunities to provide new benefits should also be explored. Proposals must also include measures for the longer term maintenance of the site (including any habitats) to ensure that they remain sustainable.

New Paragraph: The impact on peatland soils and habitats is an important consideration in determining planning applications. The extent and distribution of

[Peatland in Pembrokeshire is shown on the Peatland Data Portal<sup>\\*new footnote</sup> and on PCC's Constraint map.](#)

[\\*New footnote: For further detail on the location of peatland in Pembrokeshire see https://smnr-nrw.hub.arcgis.com/apps/d18ef8c74ecc4dc4a0cbf71ab6935ba0/explore](https://smnr-nrw.hub.arcgis.com/apps/d18ef8c74ecc4dc4a0cbf71ab6935ba0/explore)

**GN 43 Protection of Trees, Woodlands and Hedgerows**

Development will only be permitted where it does not cause unacceptable harm to trees, woodlands and hedgerows of significant green infrastructure, ecological, public amenity or cultural value. In particular ancient and veteran trees will be protected wherever possible.

Ancient woodland, identified on the constraints map, will be protected from any development which would cause detrimental impact unless there is an overriding public benefit.

All planning applications should be accompanied by a tree survey where trees are present on site.

Proposals for development will, where appropriate:

- 1 Contribute to the protection of woodlands and woodland fringe;
- 2 Promote sustainable management, avoiding detrimental impact on trees, woodlands and hedgerows;
- 3 Maximise retention, protection and integration of existing trees, woodlands and hedgerows and prioritise those of highest value and condition within and on the development site boundaries through iterative site layout design, which avoids potential impacts;
- 4 Provide compensatory planting of equal likeness for tree, woodland and hedgerow loss, in order to deliver an overall increase to tree cover. This should preferably be within, or adjacent to the site. Where feasible, translocation should be considered for impacted hedgerows;
- 5 Keep potential impacts to retained trees, woodlands and hedgerows to a minimum through site specific design, method statements and protection measures;
- 6 Provide space for the rooting volume within the site layout and in relation to neighbouring land uses, to enable the healthy growth of existing and newly planted trees, woodlands, and hedgerows to maturity and to avoid potential loss during the lifetime of the development;
- 7 Manage existing trees, woodlands, and hedgerows to improve their condition within and on the site boundaries; and
- 8 Provide additional planting of trees, woodlands, and hedgerows appropriate to the site that will deliver green infrastructure benefits.

5.243 This policy provides detailed guidance on considering proposals which have the potential to affect existing trees, woodland and hedgerows and to guide the integration of planting within new development. The purpose of the policy is to protect trees, woodlands and hedgerows. Their contribution within the urban form is particularly recognised. They can help tackle air pollutants, flooding, and noise pollution, and provide numerous other benefits including the provision of shade and visual amenity. They also provide extensive areas of habitat for wildlife, especially mature trees.

5.244 New development should ensure that existing trees, woodlands, traditional orchards and hedgerows of recognised value are conserved, enhanced and

managed accordingly. The Council will expect that significant trees, woodlands and hedgerows be retained and protected alongside development proposals and accordingly are afforded appropriate allocation of space to allow characteristic and unhindered natural development. Where possible, amenity trees and trees of large stature should be retained and incorporated within public open space.

- 5.245 We consider tree retention and additional new planting to be integral to creating cohesive and healthy communities within a valued and biodiverse rural and landscape context. All planning applications should be accompanied by a tree survey where trees are present on site. This should include protection, mitigation, and management measures. Appropriate long-term and short-term management measures must be implemented to protect newly planted and existing trees, woodlands, and/or hedgerows.
- 5.246 New trees planted should be of a species native to, and of a maturity respective to the site to the Council's satisfaction. The Council will expect the applicant to make every reasonable effort to retain existing features, and as such their retention should (where appropriate) be considered integral to the design of the proposed development site from the outset. Where loss is unavoidable, compensatory planting should be proportionate to the loss identified in the arboriculture assessment and take into account the maturity and quality, environmental and ecological importance of the trees lost. See PPW (Chapter 6) for further details.
- 5.247 Ancient Woodlands are irreplaceable habitats of high biodiversity value, providing historical and cultural links as well as recreational and educational benefits and, as such will be protected from development and associated impacts that would have a detrimental impact upon the values and services provided.
- 5.248 Veteran, heritage, ancient trees and ancient hedgerows cannot be recreated and therefore developments will be expected to provide for their retention and long-term protection through the provision of maximum clearances from proposed development, adequate protective measures and management plans. The Local Planning Authority will not approve development that presents an unacceptable level of risk to such trees and hedgerows and their associated habitats and species.
- 5.249 Where appropriate and in accordance with the Town & Country Planning Act 1990, Tree Preservation Orders will be served to protect important amenity trees from removal or harm.
- 5.250 Six weeks' notice must be given to the Local Planning Authority for work to trees in Conservation Areas. Notice is required for works to trees that have a trunk diameter of more than 75mm when measured at 1.5m from ground level (or more than 100mm if reducing the number of trees to benefit the growth of other trees).

#### **GN 44 Biodiversity, Ecological Networks, Habitats and Species Protection and Enhancement of Biodiversity**

All development proposals should demonstrate a positive approach to maintaining and enhancing biodiversity and should promote the resilience of ecosystems.

All development proposals must provide a net benefit for biodiversity and improved ecosystem resilience, as demonstrated through planning application submissions. Features and elements of biodiversity or green infrastructure value should be retained on site, and enhanced or created where ever possible, by adopting best practice site design and green infrastructure principles. Development proposals must maintain, protect and enhance biodiversity and ecological networks / services. Particular importance must be given to maintaining and enhancing the connectivity of ecological networks which enable the dispersal and functioning of protected and priority species. Any development that would disturb or otherwise harm protected species or their habitats, or the integrity of other habitats, sites or features of importance to wildlife and individual species will only be permitted in exceptional circumstances, where the effects are minimised or mitigated through careful design, work scheduling or other appropriate measures.

All development proposals must submit a Green Infrastructure Statement to demonstrate a net benefit for biodiversity in accordance with the step-wise approach.

5.251 The policy aims to ensure that species and their habitats in countryside and urban environments are protected from the potentially adverse effects of development, and where possible they are enhanced. It also includes a requirement to protect, maintain and where possible extend ecological connectivity corridors and 'stepping stone' habitats, such as road verges, gardens, rivers and green spaces in order to safeguard biodiversity and habitats and prevent their fragmentation and/or species isolation. As recognised in Planning Policy Wales and Future Wales, the multiple benefits ecosystems offer to society, including the economic and social contribution they make to local areas, should be taken into account when balancing and improving these needs.

5.252 The principles underlying the policy lie at the heart of the Pembrokeshire Local Biodiversity Action Plan (LBAP), the Nature Recovery Plan and the concept of sustainable development. The LBAP identifies priority species and habitats considered to be of national, regional and local importance. The Environment (Wales) Act (2016) places a duty on Local Authorities to maintain and enhance the species and habitats listed in the appendices of the Nature Recovery Plan. Potentially adverse effects may include disruption to species and habitats prior to, during and/or after construction, or the cumulative impacts of a development, for example, unacceptable noise, lighting or traffic impacts.

5.253 Planning proposals that affect internationally, nationally, regionally and locally designated sites, as shown on the Constraints Map, will be assessed in accordance with national planning policy and guidance, working with stakeholders and statutory consultees, and using appropriate data sources such as LANDMAP, Protected Sites Maps, Core Management Plans of relevant

National Site Network sites, Phase 1 Habitats Survey data and the West Wales Biodiversity Information Centre geodatabase of species records and habitat information.

5.254 Development proposals with potential for adverse effect on important sites will require detailed assessment before progressing. Development proposals (alone or in combination with other proposals and projects) likely to have a significant effect on a National Site Network or species will be subject to an Appropriate Assessment (see section 5.3 of Welsh Government's Technical Advice Note 5: Nature Conservation and Planning, 2009) of the implications in relation to the site's conservation objectives.

5.255 Biodiversity enhancement should be proportionate to the scale and nature of the proposed development and describe how green infrastructure has been incorporated into the proposal. Planning Policy Wales (Edition 12) describes net benefit for biodiversity as follows: "A net benefit for biodiversity is the concept that development should leave biodiversity and the resilience of ecosystems in a significantly better state than before, through securing immediate and long-term, measurable and demonstrable benefit, primarily on or immediately adjacent to the site" (paragraph 6.4.5). It also refers to Building with Nature standards which represent good proactive advice for developers to improve the quality of schemes and demonstrate the sustainable management of natural resources.

5.256a All applications will be required to submit a Green Infrastructure Statement to demonstrate biodiversity enhancement, deliver a net benefit from the baseline state and demonstrate that a step-wise approach, as outlined in Section 6.4 of Planning Policy Wales (Edition 12) has been followed.

5.256b The Green Infrastructure Statement should highlight any baseline data and surveys undertaken in relation to habitats and species on the site; for example, relating to arboriculture, sustainable drainage, landscape and ecology, open and green space provision and active travel links. The step-wise approach requires adverse impacts to firstly be avoided, then minimised, mitigated and as a last resort compensated for.

5.256c Biodiversity enhancements must be secured primarily on or immediately adjacent to the site and can include the planting of native trees or hedgerows, green roofs, wildflower meadows or grassland for wildlife or wetland creation. For larger scale developments, wider landscape measures may include the creation of species-rich meadows, woodland expansion and improvement of linkages between existing green infrastructure.

5.256d Paragraph 6.4.12 of Planning Policy Wales states "Where biodiversity enhancement proportionate to the scale and nature of the development is not proposed as part of an application, significant weight will be given to its absence, and unless other significant material considerations indicate otherwise, it will be necessary to refuse permission."



**GN 45 Green Infrastructure**

Development will be required to demonstrate a positive impact on the county's Green Infrastructure network through protection, enhancement and management, or the provision of new Green Infrastructure which strengthens the GI network and its connectivity through:

- i) Integration of green infrastructure into development proposals;
- ii) Maximising the interconnectivity of green infrastructure within and around the site and connections to the wider ecological network; and
- iii) Maximising the multi-functionality of green infrastructure

Any loss of green infrastructure will require acceptable mitigation and contributions may be sought (see policy GN 3).

5.257 Green Infrastructure assets are natural and semi-natural green spaces which contribute to the county's biodiversity, nature conservation, distinctiveness and sense of place, and support the well-being of visitors and residents through their enjoyment of places for nature, recreation or sport. Key green infrastructure assets to be valued, protected, enhanced and managed include:

1. Coast and undeveloped countryside;
2. River corridors;
3. Locally, nationally and internationally designated biodiversity or geodiversity sites;
4. Trees, woodlands, hedgebanks and hedgerows;
5. Parks, playing fields, recreational and amenity open spaces (see GN 51 Protection and Creation of Outdoor Recreation Areas and GN 52 Protection of Open Spaces with Amenity Value);
6. Sustainable Urban Drainage Systems (SUDS) provision;
7. Nature-based solutions to provide flood attenuation and improve water quality;
8. Active travel routes, including footpaths, cycle tracks and the public rights of way network and public transport nodes;
9. Road verges;
10. Allotments, community gardens and green roofs;
11. Historic sites.

5.258 This policy aims to retain and improve the network of natural and semi-natural spaces 'Green Infrastructure' within the county. Green infrastructure should be multifunctional and may serve a wide range of purposes. Benefits of green infrastructure include reducing the impact of climate change, enhancing and protecting ecological networks for biodiversity and habitats for species connectivity, sport and recreation, improvements to health and well-being which contribute to place-making.

5.259 Where a development is permitted, planning conditions and/or obligations will be used to protect or enhance the green infrastructure network. New

developments should ensure that there is no loss or fragmentation of connectivity and may be required to provide new green infrastructure of an appropriate size, type and location. Alternatively, mitigation and compensation may be required to offset adverse effects of development (see GN 3 Infrastructure and New Development). Supplementary Planning Guidance will provide greater detail of how this policy will be implemented.

**GN 46 POLICY DELETED****GN 46 Coastal Change**

Within coastal change management areas identified on the constraints map, development will only be permitted where:

1. It is water compatible development, essential transport and utilities infrastructure, and justified less vulnerable development; or
2. It would not create new, or change of use to, any type of use class C, residential development, including the conversion or extension of existing buildings; or
3. It would not extend an existing use class C residential property.

- 5.260 reasoned justification deleted. Accounting for the potential for coastal change within the Local Development Plan is a precautionary approach and excludes new or extensions to residential development within or partly within areas at risk from flooding or coastal erosion. The proposals map shows areas of risk within the lifetime of the plan and beyond, where no existing or planned sea defences are expected to safeguard property.
- 5.261 reasoned justification deleted. Sea-level rise data has been used to define areas at risk of flooding, and these are shown on the constraints maps as coastal change areas. The constraints map includes the Natural Resources for Wales Flood Map for Planning (FMfP). This includes layers called 'FMfP TAN 15 Defended Zones' and 'FMfP Flood Zones 2 and 3'. These layers need to be viewed together and in combination define what this Plan is referring to as the 'coastal change management areas'—but to note that it is only the 'sea' element of Flood Zones 2 and 3 that need to be considered in the latter case.
- 5.262 reasoned justification deleted. The approach seeks to reduce risk to existing communities and vulnerable properties, as well as defining areas where properties are likely to be at risk in the future. Vulnerable development should not be allowed to take place in areas where flood, inundation or coastal erosion are likely to occur during the lifetime of the property. The lifetime of the property is a key consideration and mapped areas will always be considered to be at risk over the long term, which for the purposes of this Plan is taken to relate to a 1 in 100 year flood event.
- 5.263 reasoned justification deleted. For the purposes of this policy residential development is taken to include all proposals relating to use class C

### **GN 47 Water Quality and Protection of Water Resources (rename SP 12A and move to Strategic Policy section)**

Proposals will be permitted where they do not have an adverse effect upon water resources, water quality, fisheries, elements of nature conservation, public access, or water related recreation use in the Plan area.

Development proposals must make efficient use of water resources and, where possible, contribute towards improvements in water quality by:

1. Incorporating Sustainable Drainage Systems (SuDS) into development proposals; and
2. Safeguarding watercourses through use of ecological buffer zones or corridors, protecting and where possible enhancing riparian habitats and species and water quality; and
3. Ensuring provision of flood plain capacity.

Development will only be permitted if it can be demonstrated that there is no adverse effect on the integrity of phosphorus-nutrient sensitive riverine Special Areas of Conservation (SACs). Proposals where adverse effects on site integrity cannot be ruled out will not be supported.

Phosphorous: In the hydrological catchment area designated for riverine SACs, development creating wastewater discharges will be required to demonstrate there is capacity within the environmental permit limits set at the Wastewater Treatment Works to which it drains, taking account of fair share principles within the catchment into which the Works discharges. Phasing of housing development will be required to match the delivery of anticipated Sewage Treatment Work improvements as set out in Policy GN 13 Residential Development, Policy GN 16 Residential Allocations, Policy GN 17 Residential Commitments and the Local Development Plan's 'Delivery Appendix'.

Improvements being delivered under the Review of Permits apply a 'fair share' approach where appropriate steps (other action) are secured to avoid deterioration. To grant permission the planning authority will, with the benefit of advice from the Natural Resources Wales, need to ensure that appropriate steps [new footnote] are 'secured' to avoid deterioration before granting planning permission. To be secure evidence will need to demonstrate how:

- Further improvements necessary to avoid adverse effects to site integrity have been quantified; and
- The action to be taken has been clearly identified and is associated with an appropriate delivery mechanism; and
- There is a clear timeframe for implementation to achieve the conservation objective phosphorus targets.

Where new development relies upon other action to be taken delaying development will be required if the planned improvements have not been carried out or where appropriate steps are not considered to be secured.

New footnote: It is anticipated that the delivery of fair share improvements will require a suite of steps/measures including: Regulatory measures – e.g. the NRW Review of Permits and enforcement of existing environmental legislative requirements. Management/Restoration measures - to reduce threats and pressures from surrounding activities and land use.

Where a fair share approach cannot be shown to be secure, or shown to be securable, and evidence demonstrates that adverse effects on the integrity of river SAC can be avoided or offset using developer mitigation, the proposed mitigation measures must be agreed with the Council. In these circumstances developer led mitigation will need to achieve nutrient neutrality over the lifetime of proposed development.

Developer provision of sustainable drainage systems in the affected catchments using three stages for treatment phosphorous removal to maximise removal rates will be required.

Nitrogen: Where nutrient neutrality is required development involving an overnight stay (including dwellings and all forms of holiday accommodation) that discharges into a nutrient neutrality designated SAC catchment (either surface water, non mains drainage development or through wastewater treatment works) will be required to demonstrate that it will be nutrient neutral for the lifetime of the development, either by its own means or by means of agreed mitigation measures. In addition, proposals that serve a population from outside of a SAC catchment who are not already served by residential connections to existing public or private sewers discharging within the affected SAC catchment will also be required to demonstrate nutrient neutrality.

Developer provision of sustainable drainage systems in the affected catchment using the recommended options to maximise removal rates will be required. Policy GN 3 Infrastructure and New Development also provides for the timely delivery of infrastructure (see criterion 2 bullet point 11). This would include water treatment infrastructure to ensure no adverse effects result.

In the case of both Nitrogen and Phosphate affected areas a Nutrient Mitigation Assessment should accompany the planning application, demonstrating a sufficiently certain mitigation approach, legally secured in perpetuity for the lifetime of the development.

Other attributes of river water quality may also need to be taken into consideration.

5.264 Water as a resource is extremely valuable and matters such as pollutants, flood prevention, groundwater and the protection and enhancement of aquatic ecosystems are all important considerations reflected by legislation and guidance. The Water Environment ([Wales Framework Directive](#)) ([England and Wales](#)) Regulations 2017 set out the requirements in relation to the water environment and full regard should be had to its content when addressing matters relating to water quality and riverine ecological health. Flood risk hazard from water is managed through the Flood and Water Management Act, 2010, which covers matters such as use of SuDS and responses to lack of water resources, for example arising through droughts.

5.265 Water pollution and consequent poor water quality can be from a single point source (e.g. a wastewater treatment works discharge), or from diffuse sources,

from agricultural and urban land use. The WFD has provided the opportunity to work with partner organisations, particularly Natural Resources Wales, to recognise the need to improve the whole water environment and promote the sustainable use of water for the benefit of both people and wildlife. River Basin Management Plans (RBMP) have been prepared which set out environmental objectives and standards, and a programme of measures by which they can be achieved.

5.266 Dŵr Cymru Welsh Water (DCWW) is responsible for the supply and treatment of water within the County. DCWW continues to meet increased demand for sewerage services through legislative and regulatory mechanisms, and supply / demand investment as set out within the Asset Management Programme (AMP) and other similar investment programmes. The AMP investment will help to support the future growth and regeneration proposed by this LDP in certain locations.

5.267 The consideration of the environment is a key element of the sustainable development concept. Given that the impact of the Plan's allocations and commitments have already been considered by the Authority and deliverability established, this policy simply provides a means to explore project or application-level matters on a site-by-site basis, as and where appropriate. This policy seeks to provide the Authority with a means to consider the merits of proposals that come forward within the Plan period that are not specifically identified within the Plan.

5.268 Water quality can be improved through measures such as effective design, construction and operation of sewerage systems, the use of green infrastructure such as wetlands or greenspace for flood alleviation, and the use of Sustainable Drainage Systems (SuDS). In terms of using SuDS to reduce phosphorous in surface water runoff C808 Use of SuDS to reduce phosphorus in surface water runoff [new footnote.1] provides guidance on what forms of SuDS works best – pages 24 to 26. The guidance advises that using three stages for treatment produces the most results and gives examples at 3.3.3 where Train 1: pervious paving discharging into swale discharging into pond gives a mean removal of 51%.... Ponds are seen as the best method for dealing with this pollution. For nitrogen, the publication ‘Construction Industry Research and Information Association [CIRIA] (2023) refers to using SuDS to reduce nitrogen in surface water runoff’ and advises in Chapter 8 that ‘Where the SuDS management trains described in Option 1 and 2 (Sections 7.1 and 7.2) are designed in accordance with CIRA C753 and where full treatment is provided for all sub annual rainfall events, these schemes can be considered to capture and remove 30% of the nitrogen in the run off from the development as an average over the year.’ [New footnote 2.] Such measures can also bring wider benefits such as biodiversity enhancements and flood alleviation. The promotion of good agricultural practice and the sustainable management of natural resources can also contribute to improvements in water quality. Where appropriate and applicable to the planning system, this plan identifies measures that can be taken forward. Reference is made to restoration as a key principle of the Water Environment Regulation

New Footnote 1: <https://epg-ltd.co.uk/wp-content/uploads/2024/03/c808-using-suds-to-reduce-phosphorus-in-surface-water-runoff-psg-1.pdf> New Footnote 2: The performance of SuDS is extremely variable and dependent on the detailed design and the physical characteristics of the site. The figure of 30% is being used as a high-level assumption input for the calculator based on the findings of the CIRIA report.

2017, such as the use of green engineering to restore the natural state and functioning of the river system by removing culverts to help support biodiversity, recreation, flood management and landscape development.

- 5.269 Proposals should seek wherever possible to incorporate water conservation techniques including rainwater harvesting and grey-water recycling.
- 5.270 The water supply requirements for Pembrokeshire are in most cases met by Dwr Cymru Welsh Water, although there are some properties served by private systems. The Plan area is primarily within the Pembrokeshire Water Resource Zone. Most water supply comes from the Bolton Hill Water Treatment Works. The feed for this is from the Eastern Cleddau and Western Cleddau rivers, through Canaston Bridge and Crowhill respectively. The Canaston Bridge feed is the most significant and is supplied through water releases from Llys-y-Fran reservoir. There was a significant supply against demand deficit in Pembrokeshire, requiring demand management, identified by the DCWW Resource Management Plan, 2019. The draft DCWW Resource Management Plan for 2024 (not yet finalised) also references the supply risk. However, this more recent Plan references an upgraded link main from Llys-y-Fran reservoir to Preseli Water Treatment Works, which was completed in early 2023. It also refers to accelerated delivery of a Canaston Bridge Scheme, through installation of a temporary solution to reduce draw-down from Llys-y-Fran reservoir. The Pembrokeshire Water Resource Zone is now considered to be resilient to a 1 in 200-year drought event without the need for emergency drought orders. There are other water supply sources in the County in addition to those mentioned above, including various groundwater aquifers which are safeguarded from contamination through the use of Source Protection Zones.
- 5.271 Development should seek to connect to the existing mains waste water infrastructure network in the first instance. Exceptionally, for development proposals where it is not feasible to connect to public waste water treatment works (WWTW), the proposer would need to justify why connection is not feasible and demonstrate compliance with WG Circular 008/2018 and Natural Resources Wales guidance for connections to private treatment works / systems.
- 5.272 New development proposals which place pressure on the capacity of the existing water supply and the water and sewage treatment infrastructure must ensure the necessary infrastructure is in place to adequately serve what is proposed, or is programmed for delivery, for example by inclusion within an adopted AMP programme or similar. The increasing pressure on the infrastructure and on nature is an important consideration and new development proposals will be expected to demonstrate that conservation of water resources and the protection of water quality have been taken into account and appropriate provision has been made to address any issues identified.
- 5.273 Additional considerations apply to new development where there is the potential for increases in nutrients (phosphorus and / or nitrogen), particularly because of waste water discharges and land use changes, to have an adverse effect on the integrity of the Afon Cleddau, and Afon Teifi [and the Pembrokeshire](#)

Marine SAC ( Milford Haven inner sub-catchment) Special Areas of Conservation (SAC's), in line with the Habitats Regulations 2017 (as amended).

- 5.274 More development and connections ultimately means more nutrient generation. Dwr Cymru Welsh Water has a responsibility to manage the loads reaching a river or stream following post-treatment discharge from a wastewater treatment works. This policy seeks to manage waste-water discharges arising from new development to ensure compliance with the Habitats Regulations 2017 (as amended) and known WWTW constraints. It applies to all sections of watercourse within the riverine SAC's, including the rivers and their tributaries, within Pembrokeshire.
- 5.275 In January 2021, Natural Resources Wales (NRW) set updated phosphorus standards for riverine Special Areas of Conservation (SACs). There have been further updates to the detail of those standards since. In Pembrokeshire, compliance tests undertaken by NRW found failure to meet these new standards in the Afon Cleddau and Afon Teifi catchments.
- 5.276 Nutrient Management Boards have been established for the Afon Teifi and the Afon Cleddau river catchments. These, plus a further Nutrient Management Board for the Afon Tywi (in Carmarthenshire) are now under common management and the activities of the three west Wales NMBs are co-ordinated. These three Boards are organising and facilitating the delivery of long-term solutions for whole catchments, both to address the issue of excessive phosphorus in rivers, generated from existing activities and land uses in the wider catchment, and to identify measures which seek to deliver wider benefits and net reductions across the catchment. These measures are outside the scope of the LDP but are important for a robust approach to reducing phosphorus in Pembrokeshire's riverine SAC's. If deemed necessary, Pembrokeshire County Council will prepare Supplementary Planning Guidance to support the policy and mitigation approaches identified and to further elaborate on the role of s106 legal agreements, including developer contributions, in this topic area. Mitigation can include assisting with the implementation of measures as set out in the Teifi or Cleddau Nutrient Management Plans Action Plans to achieve the targets for compliance for phosphorus loads in the relevant sub-catchments. Developer-led mitigation should not involve the delivery of measures which are already identified as restoration measures or which may compromise future restoration. Practical planning guidance to support development, particularly the delivery of affordable housing, in Special Areas of Conservation river catchments affected by phosphorus' Prepared for Welsh Government by DTA Ecology advises at paragraph 11.4.5: 'Integrated mitigation measures are to be identified centrally, through the Nutrient Management Board.' If measures associated with a given development are put in place so that that development does not lead to a net increase in phosphorus entering the SAC river environment phosphorus neutrality can be achieved.
- 5.277 Matters relating to abstraction and water supply are in the first instance the responsibilities of Natural Resources Wales and of the water companies (in

Pembrokeshire, Dwr Cymru Welsh Water). However, the LDP takes account of these matters, both in the context of protecting aquifers and ensuring that, as far as it is possible to know, there is capacity in the water supply and distribution network to serve new development proposals.

- 5.278 The Council will continue to collaborate with and consult with Natural Resources Wales and Dwr Cymru Welsh Water on future development proposals, particularly (but not exclusively) those in and close to river corridors and estuaries. Prospective developers should seek the advice and consent of NRW whenever appropriate / necessary.
- 5.279 An appropriate buffer adjoining both banks of a river and / or stream should be incorporated into any proposals to protect and encourage local biodiversity. The requirement is generally for an 8 meter buffer on each side of the channel where proposals relate to a main river, and 7 meters on each side of the channel where proposals relate to an ordinary watercourse. In some circumstances, activity near watercourses will need additional consents or permits, including Flood Risk Activity Permits (FRAP) from Natural Resources Wales on main rivers and / or Flood Defence Consents from the Lead Local Flood Authority on ordinary watercourses.

Nitrogen: To ensure there is no net increase in nutrients, all relevant developments with drainage pathways into the nutrient neutrality waterbodies identified by Natural Resources Wales will need to demonstrate that they are nutrient neutral, either by their own means or through contributions to an agreed nutrient mitigation scheme, for the lifetime of the development. This requirement applies to residential development, tourist attractions, other development involving an overnight stay and development expected to serve a population from outside of an SAC catchment who are not already served by residential connections to existing public or private sewers discharging within the affected SAC catchment. The relevant catchments are identified from time to time in advice published by Natural Resources Wales. This advice, together with other information, including the All Wales Nutrient Budget calculator should be used to prepare a nitrogen budget to accompany applications, and is available on the Council's Nutrient Neutrality webpage [new footnote]. Any guidance Natural Resources Wales produce will be considered a material consideration at that stage, together with Policy GN 47 on Water Quality and Protection of Water Resources. Drainage requirements will need to be considered at the design stage and be developed and implemented in accordance with recognised standards.

New Footnote: Guide being prepared for the Council – consultancy preparing a draft for January 2026 circulation.

### GN 48 Green Wedges

In order to prevent the coalescence of settlements Green Wedges have been identified at the following locations:

- Haverfordwest / Crundale
- Haverfordwest / Merlins Bridge (east)
- Haverfordwest / Merlins Bridge (west)
- Haverfordwest / Portfield Gate
- Neyland / Llanstadwell
- Fishguard / Goodwick
- Fishguard / Lower Town
- Pembroke / Pembroke Dock
- Tenby / Penally

These areas have particular importance in maintaining the distinct identities of separate communities. Within the Green Wedges there will be a general presumption against inappropriate development.

5.280 Green Wedges play an important role in maintaining Pembrokeshire's landscape setting and preserving openness. Land on the edge of the Urban Settlements and Rural Town is vulnerable to the pressure of development, this in turn can result in the urbanisation of rural areas, coalescence of settlements and loss of important green space and green infrastructure (see Policy GN 43-45). This policy aims to identify and protect such vulnerable areas from inappropriate development, as defined in national policy, with development proposals determined in accordance with PPW Edition 12 (2021) paragraphs 3.64-3.78.

5.281 Specific details of each of the designations are contained in LDP Background Paper 'Green Wedges' [20222019](#). The spatial extent of the Green Wedge allocations is shown on the LDP Proposals Map.

**GN 49 Landscape**

All proposals will be required to:

- i) Be well integrated into the landscape in terms of scale, siting and design and have an acceptable visual impact in relation to the characteristics and qualities of the landscape; and
- ii) Acceptably mitigate any impact on protected landscapes, registered historic landscapes, parks and gardens.

Proposals which are likely to have a significant visual or landscape character impact will be required to demonstrate how the development can be acceptably mitigated.

5.282 This policy, alongside SP12 'Maintaining and Enhancing the Environment' aims to ensure that unacceptable harmful impact on landscape is avoided, and suitable mitigation achieved. The characteristics and qualities of the landscape include its development pattern, features and topography, visual and sensory, cultural, geological, historic and habitat assets, and its intrinsic landscape character. A Landscape Character Assessment for the Plan area has been prepared as Supplementary Planning Guidance to the 2013 LDP and this will be rolled forward following the adoption of LDP 2. The SPG will, once adopted, form a material consideration for the consideration of development proposals, alongside any topic specific sensitivity study or guidance.

**GN 50 POLICY DELETED**

5.283 GN 50 reasoned justification deleted.

**GN 51 Protection and Creation of Outdoor Recreation Areas**

A - Outdoor recreation areas which include public open spaces, leisure routes and recreational facilities, are protected.

Development will only be permitted on outdoor recreation areas where:

1. The area has no significant public recreational value; or
2. A suitable replacement facility is to be made available; or
3. The recreational facilities will be enhanced through the redevelopment of part of the site

B – New outdoor recreation area(s) will be permitted where the following criteria are met:

1. It is well located to serve community needs; and
2. It is of appropriate size, design and form to meet the needs of the people it is intended to serve

Provision is made for the future management and maintenance of the site / route.

5.284 Recreational activities are important to the well-being of Pembrokeshire's residents and visitors. Places and facilities such as playgrounds, allotments, playing fields, parks and cycle and walking paths are used by people of all ages and encourage healthier lifestyles and social interaction. Outdoor recreation areas are also important to the environment as they can support biodiversity and contribute to the green infrastructure network. This policy aims to protect important and valued areas used for leisure and recreation and encourage the creation of new ones. Outdoor recreational areas of more than 0.25 Hectares and all children's play spaces located in Towns, Service Centres and Service Villages are identified in the 2019 Open Space Assessment and are shown on the proposals map.

5.285 When assessing the recreational value of outdoor areas the following issues should be considered:

1. The quality of the facilities and equipment
2. The clear visibility of the site from nearby homes, and the safety of users whilst accessing and using the site
3. the contribution the site makes to the overall local provision of recreational areas; and
4. The management and maintenance arrangements for the site.

5.286 Redevelopment of recreational areas, including those not shown on the Inset Maps, must be justified by demonstrating that the site has no significant recreational value, using the issues listed above. Where the applicant cannot provide this justification, an adequate replacement facility will be required

5.287 Where a replacement facility is to be provided, it will be expected to:

- Be located to meet the needs of the same local community as served by the facility it replaces
- Be of sufficient size and quality to equal or exceed the recreational value of the facility it replaces
- Provide the same facility as it replaces or be of a type that is recognised as being in short supply in the area; and
- include an agreement for the future management and maintenance of the site

5.288 It may be appropriate to permit a small part of a site to be redeveloped for other purposes if proposals include the adequate improvement to the condition or provision of recreational facilities at the remainder of the site.

5.289 The Fields in Trust issued updated guidance for Wales in January 2017. 'Guidance for Outdoor Sport and Play – Beyond the Six Acre Standard' sets out guidance for the quantity of outdoor play and sports areas, including pitches, equipped and designated play areas, multi-use games areas and skate-parks per 1,000 population and sets out guidance on walking distances to these facilities. It also provides guidance on informal open space. An Open Space Assessment background paper has been prepared which identifies existing open space, both formal and informal for settlements within Regional Growth Areas, urban settlements, Service Centres and Service Villages. It should be used to help assess whether there are acceptable levels of provision available to communities.

5.290 New outdoor recreational areas are encouraged. They should have regard for their impact on the character of the area, the well-being of the local community, be of a type that suits local demographic patterns in locations where access by a range of means of transport is possible.

5.291 Development of school playing fields will be assessed using GN 29 Community Facilities policy.

**GN 52 Protection of Open Spaces with Amenity Value**

Development which would adversely affect the appearance, character or local amenity value of areas of public and private open space will not normally be permitted. In exceptional circumstances, where the proposal will bring clear social and /or economic benefits to the local community and make a positive contribution to the built environment, development may be permitted where it can be demonstrated that no suitable alternative site is available and the open space does not have significant amenity value.

- 5.292 This policy seeks to protect open space which has local amenity value, for example because of its appearance or character. Such spaces can be gardens, civic spaces, cemeteries, green corridors, green infrastructure, and green spaces around buildings, village greens and land which helps to establish the setting for a settlement.
- 5.293 To be of amenity value an area of open space need not have a formal use or be accessible to the general public as long as it contributes to the appearance, character or local amenity value of the settlement or its setting. Space between and around buildings is an essential part of the built environment and often gives a settlement its distinctive character. In addition, important gaps between discrete groups of buildings or as components of the landscape setting can make an important contribution.
- 5.294 Proposals for the development of amenity open spaces must demonstrate that no suitable alternative site for the development can be found and that the proposed loss of open space/natural features has been minimised. The proposal must make a clear positive social or economic contribution to the local area and any development on the amenity open space must improve the built environment.
- 5.295 Guidance on acceptable levels for the provision of informal outdoor space can be found in the Fields In Trust 2017 publication 'Guidance for Sport and Play: Beyond the Six Acre Standard', which will be used when accessing proposals relevant to this policy.

### GN 53 Community Growing Spaces

The development of land and buildings to support food (crop) growing, including temporary use, will be supported, provided the following criteria are met:

1. The proposal is within, adjoining or well-related to the community it would serve and can be sustainably accessed by active means of travel;
2. The proposal would meet local demand for community growing and any loss of open space for recreation or amenity purposes is considered acceptable;
3. There would be no unacceptable impact on habitats or protected species and an overall net biodiversity enhancement can be achieved;
4. Any known or suspected contamination can be kept out of the food production through the use of raised beds or other measures;
5. The proposal would protect or enhance the historic or heritage value of the site or surroundings;
6. The proposal would have an acceptable visual impact on the character and value of the landscape, or where the proposal is within a Green Wedge designation, the undeveloped character and openness of the land would be retained; and
7. The proposal would protect the amenity and privacy of nearby residents.

5.296 In many cases food (crop) growing can take place without the need for planning permission. There are however, circumstances when planning permission is required to change the use of land, or to introduce structures in support of the food growing venture.

5.297 Community Growing Spaces include community orchards, street planting and community gardens and allotments and community growing agriculture (partnership between farmers and growers).

5.298 Community growing can help increase biodiversity, community well-being and contribute towards reduced food miles and help to mitigate climate impact.

5.299 Sheds, polytunnels, or educational facilities included within larger scale proposals will be carefully considered to ensure that they do not generate an unacceptably harmful visual or landscape character impact.

5.300 Temporary permission may be appropriate for land and buildings where alternative uses are planned or allocated for future development.

5.301 Surveys may be required to ensure that the above criteria are met. Care should be taken to ensure that Community Growing Spaces do not introduce contaminated soil.

### **GN 54 Visitor Attractions and Leisure Facilities**

A. New medium and large scale visitor attractions and commercial recreation and leisure proposals will be permitted where both the following criteria are met:

1. The site is well located in relation to A or B class roads and/or, rail stations and/or bus routes; and
2. The site is within or immediately adjoins a settlement, unless the proposal requires a countryside location, in which case evidence must be provided to support this.

B. New small scale visitor attractions and facilities outside of settlements must justify their location and should follow a sequential approach to location, where adaptation and re-use of an existing building is considered first, then previously developed land, and finally greenfield land.

C. Extensions to the area, or an intensification of the visitor, commercial recreation or leisure facility, will be permitted where the scale and nature of extension would be compatible with its location.

In all cases, any new or extended attractions and facilities must respect their wider environment in terms of scale, character, design, layout, appearance, sense of place, etc and should encourage, and where appropriate enable, sustainable travel.

5.302 The Pembrokeshire Destination Management Plan focuses on the importance of delivering quality provision that is open all year round with sustainability at its heart. In line with the Strategic Policy on the Visitor Economy, proposals will be expected to demonstrate that they are building on the distinctiveness of the locality by the offer that they are presenting.

5.303 This policy aims to support new visitor attractions and leisure facilities that are well located to serve both residents and visitors. Visitor attractions and leisure facilities should, where practicable, be located in easily accessible locations, and preferably use existing buildings or be located on previously developed land. In all cases this policy aims for high quality proposals appropriate in scale, design, character, layout, and appearance appropriate to its surroundings.

5.304 For the purposes of this policy, the term 'small scale' is taken to refer to domestic or single farm holding scale and in all cases will be 0.5 hectares or less in extent.

**GN 55 Serviced and Hotel Accommodation**

Proposals for serviced or hotel accommodation (excluding caravan or chalet accommodation) will be permitted where:

A. For new developments either:

- 1) It is within or is adjacent to a Town, Service Centre or Service Village; or
- 2) The proposal is for the conversion of an existing dwelling, a historic building or a traditional agricultural building.

B. For extensions to existing businesses:

The scale, type, character, design, layout and nature of the proposal, including the extension, must be compatible with its location and acceptable in terms of landscape capacity and should reflect and respect the role and function and sense of place of the area.

5.305 Serviced development relates to accommodation where an element of service is provided, such as for bed and breakfast and hotel businesses.

5.306 Serviced development can be appropriate either where it is within or adjacent to a settlement or where it makes use of an existing dwelling. The reasoned justification for Policy GN 13 Residential Development sets out circumstances where conversion of historic buildings would be acceptable for residential use. Traditional agricultural buildings when converted may also be appropriate for self-catering or catered development. Policy GN 34 Conversion or Change of Use of Traditional Buildings sets out criteria for conversion or change of use of agricultural buildings.

5.307 Where possible proposals will be encouraged to make use of existing buildings. Policy GN 1 General Development Policy seeks to ensure that development is of an appropriate scale for the site and area within which it is located. This consideration is of particular importance when considering proposals for the visitor economy.

5.308 Where proposals for this type of development are within coastal change areas, the provisions of policy GN 46 should also be taken into consideration.

5.309 Proposals for new serviced accommodation or hotel accommodation are considered to be those types of accommodation not currently existing on an application site, whereas extensions are considered to relate to sites which already provide serviced and hotel accommodation and further provision of the same nature is envisaged.

5.310 Planning conditions will be imposed, where appropriate, to ensure that facilities remain as holiday accommodation units and are not used as permanent accommodation or occupied as a primary residence. In these situations holiday occupancy conditions, limiting the time a single household may stay in a unit and return by, may be applied.

### GN 56 Caravan, Camping and Chalet Development

- A. New medium or large-scale caravan, camping and chalet proposals, will be permitted where each of the following criteria can be satisfied:
1. They are proposed to be sited within or adjacent to a Service Village, a Service Centre or a Town; and
  2. They are in locations deemed acceptable in landscape capacity terms.
- B. New small scale caravan, camping and chalet proposals, will be permitted where they are in locations deemed acceptable in landscape capacity terms.
- C. Upgrades or extensions to existing sites will be permitted where the overall scale and additional numbers of units or pitches is acceptable in landscape capacity terms, and where the scheme delivers environmental enhancements.

In all cases:

1. Proposals should be of high quality in terms of design, layout and appearance;
2. Proposals should not result in an over-concentration of sites within an area;
3. Proposals should not result in an excessive area of hard standing being created; and
4. Appropriate landscape mitigation measures will be required wherever they are deemed necessary to make a proposal visually acceptable.

5.311 The tourism offer in Pembrokeshire should be a quality sustainable provision, which gives visitors an outstanding experience and maximises the benefits that tourism brings for local communities, whilst minimising potentially adverse landscape and other environmental impacts. [Landscape capacity is the amount of change that a landscape character area can accommodate without adverse changes to the character or key characteristics or undue consequences for the achievement of landscape policies in the area. It takes into account existing development within the area as well as the landscape sensitivities and considers potential cumulative effects at a strategic level.](#) This policy will be supported by a Caravan, Camping and Chalet Landscape Capacity Assessment Supplementary Planning Guidance document<sup>31</sup>, providing a systematic assessment of the capacity of existing Landscape Character Areas to accommodate a range of different types of caravan, camping and chalet developments including emerging types of accommodation. This will include advice, on a Landscape Character Area basis, regarding whether:

- a) Existing sites can be upgraded and / or extended to increase accommodation;

<sup>31</sup> See the LDP Evidence base document prepared by Simon White Ltd and titled 'Caravan, Camping and Chalet Landscape Capacity Assessment' – this document provides the basis for the SPG to support policy GN 56 of the Plan.

- b) Existing sites can be extended to improve appearance; and
- c) New sites can be accommodated without causing unacceptable landscape impacts.

5.312 The SPG will set out both generic and detailed advice on what is meant by terms such as ‘away from the coast and Preselis’ and ‘sensitive locations’, how to assimilate proposals into the landscape and how to mitigate and enhance. The SPG will contain tailored recommendations and guidance for each landscape character and should be read in conjunction with this policy. As part of any proposal for Caravan, Camping and Chalet Development, applicants will be expected to demonstrate how they have responded to the requirements of the SPG.

5.313 The table below, from page 7 of the ‘Caravan, Camping and Chalet Landscape Capacity Assessment’ (which will form the basis for the draft SPG), sets out what is meant by site size (small, medium and / or large) and what is meant by the terms seasonal and static. Size thresholds were derived from a preliminary assessment of a sample of different developments in the Pembrokeshire landscape, taking into account the scale and pattern of the landscape.

Table 3: Definitions for different types of development and site sizes:

Type of Development and Site Size	Definition
Static: Large	Static units including caravans, chalets and pods/hard structure glamping options on a site above 3Ha.
Static Medium:	Static units including caravans, chalets and pods/ hard structure glamping options on a site >0.5Ha- 3Ha.
Static: Small	Static units including caravans, chalets and pods/hard structure glamping options on a site 0- 0.5Ha.
Seasonal: Large	Seasonal units including touring caravans, tents, soft structure glamping options such as yurts, tepees and safari tents above 3Ha.
Seasonal: Medium	Seasonal units including touring caravans, tents, soft structure glamping options such as yurts, tepees and safari tents >0.5Ha- 3Ha.
Seasonal: Small	Seasonal units including touring caravans, tents, soft structure glamping options such as yurts, tepees and safari tents 0- 0.5Ha.

5.314 The definition of touring units includes touring caravans, tents, trailer tents and motor-caravans, motorhomes, touring vans and campervans.

- 5.315 Glamping is defined as a form of accommodation which has been pre-erected on-site and can include yurts, tepees, pods, tree houses and safari tents, although it can be provided by a range of other structures. The degree of locational permanence, scale and design will determine how these structures are considered. [Chalets are also pre-erected on site and have a range of styles. The degree of permanency and type of building materials will determine whether such structures are considered under this policy or under Policy GN 58 Self-Catering Accommodation.](#)
- 5.316 Soft 'glamping' options such as yurts, tepees, safari tents and bell tents will be treated as touring units or seasonal development, provided they are removed from site when they are not in use and / or for the majority of the year, and the site allowed to grass over. Where associated fixed infrastructure, such as decking, fencing or solar panels is proposed, the tents may be considered the same as static caravan development. Each proposal will be considered on a case-by-case basis.
- 5.317 Hard 'glamping' options such as pods or wooden tents or other hard structures may be considered to be the same as touring or static caravans or lodges, in accordance with the statutory definition of a caravan in Appendix C of the 'Caravan, Camping and Chalet Landscape Capacity Assessment'. The consideration will also depend on whether the structure can be removed easily off site in one piece; if it has a permanent concrete base; whether it is permanently connected to an electrical supply and / or to other services such as water and waste disposal; or has ancillary structures such as decking, fencing or solar panels associated with it. The decision on its status will be made on a case-by-case basis.
- 5.318 Any new medium or large-scale proposals must be within or adjacent to a settlement identified in the hierarchy as a Service Village, Service Centre or Town. This will ensure that visitors are able to easily access services and facilities available in nearby settlements by walking, cycling or using public transport. Definition of the scale of proposal considered to be medium or large-scale is included in Table 7, above. Overly dense development will not be considered to be appropriate. Flexibility may be taken in assessing large or medium scale proposals which incorporate very low density glamping proposals which can demonstrate low landscape impacts. In such cases a condition limiting the density and numbers of units on site will be applied.
- 5.319 Extension of the area of an existing touring caravan or tent site or upgrading of pitch types will be permitted where it would achieve a demonstrable overall environmental improvement both for the site as a whole (including existing elements) and its setting in the surrounding landscape. When considering site extensions, the extent of the entire proposed site area (including the existing area and proposed extension) will be used to define the overall scale of the site (see Table 7, above). Proposals that would result in a medium or large site area must be [within or adjacent \(within 400m\) of to](#) a settlement, consistent with the sustainable strategy and settlement hierarchy of

the Plan, to encourage sustainable travel such as walking, cycling and, if available, public transport.

5.320 The cumulative impact of sites within the landscape will be a material consideration. In some cases although a proposal is acceptable in landscape capacity terms, a more local visual impact will arise and will need to be assessed in the context of Policy GN 1 General Development.

5.321 This policy excludes caravanning and camping permitted by the '28-day rule' and sites operated under Certificates granted by Exempted Organisations.

**GN 57 Site Facilities**

Proposals to upgrade and improve facilities on self-catering sites (including static caravans, touring caravan and tent sites) will be permitted where:

- 1) The proposal will not undermine the viability or vitality of a facility within a nearby settlement; and
- 2) The proposals incorporate the best practicable environmental standards covering all facets of the development.

5.322 The Authority is keen to see improvements that will increase the quality of the tourism offer provided in a way that does not harm the environment and landscape or impact negatively on facilities that are located in nearby settlements that serve the wider community. ~~In a number of sites it will be desirable to improve washing and toilet facilities, and in larger sites the provision of additional facilities such as laundry facilities or a games room may be justified.~~ Where possible existing structures or buildings should be re-used.

5.323 Site facilities comprise a wider range of amenities and services than those serving the wider population and include showers, toilets, dish-washing and laundry facilities as well as shops, leisure and sports facilities and buildings intended for social activities and entertainment. Criterion 2 of the policy therefore requires that all aspects of such facilities that can impact on the environment are fully considered. Such considerations include impacts on the landscape - such as siting, landscaping and lighting. ~~The design and siting of facilities needs to be sensitive to the landscape.~~ Any landscaping measures should maximise biodiversity and use native species appropriate to the landscape setting and. ~~Any proposals must~~ demonstrate they are in line with the requirements of the Caravan, Camping and Chalet Landscape Capacity Assessment, which as noted above will form the basis for SPG. Other potential impacts on the environment include sewage and waste-water disposal, noise, impacts on wildlife and biodiversity and amenity of neighbouring properties and businesses.

**GN 58 Self-catering Accommodation**

Self-catering accommodation will be permitted where it is located within a Town, Service Centre, ~~or~~ Service Village ~~or Local Village~~ as defined in the Plan's settlement hierarchy.

Proposals will be expected to demonstrate that there is an appropriate balance in the settlement between housing as main, primary residences (Use Class C3), secondary residences (Use Class C5) and short-term holiday lets (Use Class C6).

Proposals for self-catering accommodation that is located outside the above locations will only be permitted where it involves the re-use and / or adaptation of an existing traditional building (see Policies GN 13 & GN 34). New-build self-catering proposals will not be permitted in the countryside.

All proposals should reflect and respect the role and function and sense of place of the area, most notably in terms of scale, type, character, design, layout and appearance - as well as those uses already located in the vicinity of the site.

- 5.324 Self-catering accommodation includes rented flats, cottages, houses, bungalows and/or hostels whose primary purpose is for holiday letting. This policy acknowledges the benefits of having a diverse accommodation offer in terms of providing a range and choice of places to stay. It allows new non-caravan self-catering accommodation within a Service Village, Service Centre or Town. Where planning permission is given for permanent holiday accommodation, the Council will consider the attachment of conditions restricting the use to holiday accommodation only.
- 5.325 Extensions to existing businesses should use any appropriate traditional building on site. Where this is not possible a small physical extension to the existing built fabric may be appropriate but will be strictly controlled with planning conditions and may remove future permitted development rights.
- 5.326 Buildings that are of a substandard modern utilitarian construction (including materials such as single skin concrete block work and portal framed buildings clad in metal sheeting) or buildings of substandard quality and / or incongruous appearance will not generally be considered appropriate for conversion to holiday accommodation.
- 5.327 This policy should be read in conjunction with policy GN 15 on Housing Mix, Second Homes and Short-term Holiday Lets, Space Standards and requirements for Lifetime Homes Standards. This is to ensure that there is an appropriate balance between housing as main, primary residences (Use Class C3), secondary residences (Use Class C5) and short-term holiday lets (Use Class C6), to help meet local needs for housing, maintain and strengthen the Welsh language and culture and sustain existing communities.

### GN 59 Waste Management Facilities

Proposals for the development of new waste management facilities (those relating to minimisation, re-use, recovery, recycling and treatment of waste and including waste transfer stations, waste and recycling centres, energy from waste facilities and temporary urban quarries) will be permitted where:

- 1 The site proposed is:
  - a) An existing waste management site; or
  - b) Within a building already in use for waste management; or
  - c) Allocated for B2 industrial uses, subject to their being no major adverse impacts in relation to the amenity of adjacent users or flooding; or
  - d) The type of site otherwise indicated by Welsh Government's Technical Advice Note 21 (paragraph 3.27) as being appropriate for this type of use.
- 2 The site can be readily accessed from A or B class roads, where transport by road is the only available option.
- 3 There is an identified national, regional or local need for the facility;
- 4 All waste arisings from the new facility have been considered and mitigated;
- 5 The co-location of the new facilities with potential energy users has been considered and incorporated into the proposal, wherever possible; and
- 6 Where the proposal is for the development of specialist facilities to process or dispose of hazardous waste, it must also be demonstrated that no significant adverse impacts will be caused to the health and safety of the public, to the economy and to the environment.

The following existing and proposed employment sites are potentially suitable for the provision of new in-building facilities for the handling and treatment of waste:

Site reference	Site location	Area (hectares)
S/EMP/000/00003	Milford Haven petro-chemical storage facility (Puma Energy)	159.14
S/EMP/000/00004	Waterston – tank farm and LNG	177.35
EMP/146/00001	Waterston Industrial Estate <u>N</u>	9.52
S/EMP/095/00001	Pembroke Power Station Site <u>N</u>	139.35
S/EMP/096/00005	Kingswood Industrial Estate, Pembroke Dock	8.31
S/EMP/096/00006	Waterloo and London Road Industrial Estate, Pembroke Dock	19.41
S/EMP/000/00002	Valero Refinery, Rhoscrowther	222.60
EMP/034/00006	Celtic Link Business Park, Scleddau <u>P N</u>	13.29

Site reference	Site location	Area (hectares)
S/EMP/136/00001	Trecwn	21.22
EMP/030/00001	Parc Gwynfryn, Crymych	6.92

Please note that any elements of these sites that are within an area at significant risk of flooding will not be appropriate for new waste facilities. Development will not be permitted that would result in an adverse effect on the integrity of sites of national nature conservation importance. Proposals where adverse effects on site integrity cannot be ruled out will not be supported. Of particular concern are sites where potentially nutrient issues may arise. Sites are annotated with the suffix 'P' for phosphorous and/or 'N' for nitrogen to denote where screening and appropriate assessment for the Local Development Plan has identified nutrient issues requiring addressing under Policy 12A Water Quality and Protection of Water Resources (formerly Policy GN 47).

- 5.328 The policy framework for considering waste planning matters in Pembrokeshire is provided by two European Union Directives (the Waste Framework Directive and the Landfill Directive), by Welsh Government's 'Towards Zero Waste – One Wales, One Planet' document (TZW), by various Sector Plans linked to TZW (in particular the Collections, Infrastructure and Markets Sector Plan) and by Welsh Government's Planning Policy Wales edition 12 (PPW) and Technical Advice Note 21 – Waste (TAN 21). Strategic policy SP 21 (Waste Prevention and Management) of this Plan emphasises the desirability of preventing waste arising in the first place wherever possible. The waste hierarchy set out in PPW edition 12 and TAN 21 provides a starting point for considering waste management.
- 5.329 Proposals for the handling and treatment of waste will be expected to meet the requirements of policy GN 1 (General Development Policy).
- 5.330 Annual Waste Planning Monitoring Reports (WPMRs) are prepared for the SW Wales region and these present regional conclusions on key aspects of waste planning.
- 5.331 TAN 21: Waste sets out a waste hierarchy, which is a priority order for waste prevention and management. The most desirable option is prevention and re-use, followed by preparation for re-use, recycling, other recovery and finally (if none of the other options is possible) disposal to landfill.
- 5.332 In terms of individual waste streams, the following points provide part of the context for this Plan:
- There is no regional treatment facility for residual waste in south-west Wales at present.
  - City and County of Swansea has recently taken on the role of lead authority for procurement of a long-term contract for the treatment of residual waste in south-west Wales. Welsh Government's preference is for this to take the form

of an energy-from-waste facility, but at present there are no decisions on where this facility might be located within the region.

- c) There was previously a regional reliance on overseas off-loaders as a destination of south-west Wales residual waste. However, new arrangements are now in place in Pembrokeshire that are resulting in more of the region's residual waste remaining in Wales.
- d) Pembrokeshire's food waste is currently sent to a regional anaerobic digestion facility near Bridgend. This facility takes food waste from four of the six local authorities in south-west Wales.
- e) There are some other waste streams, such as construction and demolition waste, further details relating to which are set out in the Waste Background Paper which supports this Plan.

5.333 TAN 21 sets out a waste hierarchy, which is a priority order for waste prevention and management. The most desirable option is prevention and re-use, followed by preparation for re-use, recycling, other recovery and finally (if none of the other options is possible) disposal to landfill.

5.334 At a local level, the complexities of waste management make close co-operation between Local Authorities, National Park Authorities, Natural Resources Wales, the waste management industry, the voluntary sector and the public highly desirable.

5.335 In Pembrokeshire, the County Council and the National Park Authority are Waste Planning Authorities for their respective areas. However, only the County Council is a Waste Collection and Disposal Authority in Pembrokeshire (which means that the Council is responsible for the safe collection and disposal of municipal wastes arising throughout the County).

5.336 Natural Resources Wales has responsibility for waste licencing throughout Pembrokeshire.

5.337 Policy GN 1 (General Development) makes reference to the desirability of using Natural Resources Management Plans. These take forward Circular Economy objectives, helping to keep resources in use for as long as possible and in so doing, reducing the amount of material ending up as residual waste.

5.338 The first element of this policy explains the circumstances in which proposals for new waste management facilities will be permitted. The focus is on sites and buildings already in use for waste management activities, together with sites allocated for use class B2 industrial uses (but only where there will not be major adverse impacts in relation to the amenity of adjacent users and flooding) and the type of site mentioned in paragraph 3.27 of Welsh Government's TAN 21 document.

5.339 Reference is also made in the policy to temporary urban quarries. These are repositories of materials removed from a site during the construction phase of a project but then re-used within the site prior to its completion. The urban quarry is a temporary location for off-site storage of such materials pending its re-use within its site of origin. These should be as close to the original site as possible

and should be fully restored once their temporary materials storage use has been concluded. This approach is preferable to the permanent loss of the material from the site. It might comprise top-soils, rock removed during site terracing or levelling or demolition materials from buildings formerly on the site.

5.340 There are further requirements in the first element of the policy, relating to access to the site (from A or B class roads where road access is the only option), the need for the facility, the need for waste arisings from the facility to be considered and mitigated, the need to consider co-location of the waste facility with potential energy users and setting out specific requirements in relation to disposal of hazardous waste.

5.341 The second element of the policy identifies those existing and proposed employment sites potentially suitable for the provision of new in-building facilities for the handling and treatment of waste. The former, TAN 21 advises that *'many modern in-building facilities externally appear similar to any other industrial building and internally contain industrial processes or energy generation that may be no different to other modern industrial activities in terms of their operation or impact'*. It adds that *'many general employment sites and major industrial areas are likely to be suitable locations for waste facilities but this will depend on a variety of local factors, including the nature of existing users and the strategy adopted for particular employment sites'*.

**GN 60 Disposal of Waste on Land**

Proposals for the deposit of waste on land will be permitted where:

- 1 The proposal represents the only practicable solution, having regard to the waste hierarchy, to an identified national, regional or local need;
- 2 Adequate measures (operational and aftercare) are proposed to deal with any leachate or landfill gas that might arise from the proposal;
- 3 An achievable post-operational landform compatible with the adjoining topography is proposed; and
- 4 Provision is made for landscaping, progressive restoration, appropriate beneficial after use(s), restoration and post closure management of the site.

5.342 Where waste cannot be prevented, re-used, recycled or otherwise recovered, then disposal will be required. This involves either landfill or incineration without energy recovery. Clearly, these provide the least desirable outcomes for dealing with waste.

5.343 In Wales, Local Planning Authorities are required to ensure that sufficient landfill capacity is maintained across the three regions of Wales. This is to ensure that there are disposal facilities available for the element of waste that cannot be treated further up the waste hierarchy.

5.344 Local Planning Authorities are expected to identify where landfill capacity falls below both a 7-year and a 5-year void in a region. Seven years is considered sufficient for the market to provide a solution to a shortfall, while 5 years is a trigger for pursuing action necessary to facilitate future provision. The most recent published information on the landfill void capacity in the south-west Wales region indicates that it is currently above the 7-year and 5-year thresholds. However, while the Withyhedge site in Pembrokeshire is still operational, other sites that have previously taken residual waste in the south-west Wales region may now either be operating at reduced levels or have ceased taking such waste altogether.

5.345 The Waste Planning Monitoring Report (WPMR) lists the permitted landfills in the SW Wales region at 2014. One of these is Withyhedge Landfill, Phase 2, which is situated to the north of Haverfordwest.

5.346 The 2016 WPMR for SW Wales indicates that there is about 10.7 years of void capacity left in the region. This aggregates the space that was available at that time at four different landfill sites – Withyhedge in Pembrokeshire, Nant-y-Caws in Carmarthenshire, Tir John in Swansea and Pwllfa Watkin in Neath-Port Talbot. As noted above, Withyhedge remains operational and it is understood that Nant-y-Caws in Carmarthenshire still has residual void space. Tir John no longer takes residual waste, but is operational for other waste streams until 2024. At Pwllfa Watkin the planning consenting position is uncertain.

# Appendices

## Appendix 1: Affordable Housing Table

<b>Affordable Housing Past Delivery Record (2013-2018)</b>	<b>2017/2018</b>	<b>2016/2017</b>	<b>2015/2016</b>	<b>2014/2015</b>	<b>2013/2014</b>	<b>Total</b>
With CGF	63	94	110	157	73	<b>99.4</b>
Without CGF	19	12	25	4	0	<b>11.4</b>
<b>Totals</b>	<b>82</b>	<b>106</b>	<b>135</b>	<b>158</b>	<b>73</b>	<b>110.8</b>
<b>AH delivered without CGF (5 year average)</b>	<b>AH units delivered with Grant (5 year average)</b>	<b>PCC anticipate d-delivery per year (using HRA)</b>	<b>Total per year</b>			
11.4	50	64	<b>125.4</b>			
<b>2017-2033 (Review Plan period) Affordable Housing Target (125 per year multiplied by 16)</b>	2006.4					

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

## Appendix 2: Housing Components and Trajectory

Table A: Housing Supply

	A) Total completions (Housing survey small and large)	B) Units under construction (as at April <u>2023 2025</u> )	C) Units with planning permission based on housing assessment <u>2023 2025</u> with adjustment	D) Total allocations	E) Large windfall sites (5+) for <u>2026-2025</u> 2033 based on past trends	F) Small windfall sites (under 5 units) for <u>2024 2025</u> - 2033 based on past trends	G) Total Housing Provision
Haverfordwest	<u>387 459</u>	<u>17 48</u>	<u>61 62</u>	<u>406</u> <u>403 514</u>	<u>62 56</u>	<u>77 68</u>	<u>4010</u> <u>10071207</u>
Milford Haven	<u>256 306</u>	<u>14 31</u>	<u>100 106</u>	<u>390 395</u>	<u>44 34</u>	<u>76 55</u>	<u>880 927</u>
Pembroke Dock	<u>70 130</u>	<u>40 8</u>	<u>83 12</u>	<u>130</u> <u>139</u>	<u>42 52</u>	<u>50 45</u>	<u>415</u> <u>424386</u>
Pembroke	<u>111117</u>	<u>6 4</u>	<u>83</u>	<u>285 282</u>	<u>37 32</u>	<u>65 55</u>	<u>588 573</u>
Fishguard	<u>60112</u>	<u>2 15</u>	<u>52 3</u>	<u>175</u>	<u>9 7</u>	<u>26 23</u>	<u>324 335</u>
Goodwick	<u>43 61</u>	<u>7 19</u>	<u>31</u>	<u>0</u>	<u>5 3</u>	<u>23 22</u>	<u>109 136</u>
Narberth	<u>175 184</u>	<u>0 1</u>	<u>51 43</u>	<u>89</u>	<u>12 33</u>	<u>18 15</u>	<u>346 365</u>
Neyland	<u>43 52</u>	<u>3</u>	<u>0</u>	<u>101</u>	<u>9</u>	<u>1411</u>	<u>169 176</u>
<b>Main Towns Total</b>	<b><u>1145 1421</u></b>	<b><u>89 129</u></b>	<b><u>461 340</u></b>	<b><u>1576</u></b> <b><u>1582 1695</u></b>	<b><u>220 226</u></b>	<b><u>350 294</u></b>	<b><u>3840</u></b> <b><u>3846 4105</u></b>
Service Centres	<u>192 294</u>	<u>20 42</u>	<u>184 104</u>	<u>387</u>	<u>19 24</u>	<u>43 36</u>	<u>845 887</u>
Service Villages	<u>479 615</u>	<u>86 60</u>	<u>224</u> <u>235 185</u>	<u>404</u> <u>406</u>	<u>69 71</u>	<u>135 118</u>	<u>1394</u> <u>1410 1455</u>
Cluster Local Villages	<u>23 27</u>	<u>5</u> <u>6 5</u>	<u>7</u> <u>17 16</u>	<u>0</u>	<u>0</u>	<u>23 22</u>	<u>58</u> <u>69 70</u>
Local Villages	<u>18 24</u>	<u>4 14</u>	<u>1 5</u>	<u>0</u>	<u>0</u>	<u>20 18</u>	<u>43 61</u>
Countryside	<u>160 273</u>	<u>28 15</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>68 61</u>	<u>256 349</u>

	A) Total completions (Housing survey small and large)	B) Units under construction (as at April <u>2023-2025</u> )	C) Units with planning permission based on housing assessment <u>2023-2025</u> with adjustment	D) Total allocations	E) Large windfall sites (5+) for <u>2026-2025</u> 2033 based on past trends	F) Small windfall sites (under 5 units) for <u>2024-2025</u> - 2033 based on past trends	G) Total Housing Provision
<b>Total for Rural Area</b>	<del>872</del> <u>1233</u>	<del>143</del> <u>144</u> <u>136</u>	<del>413</del> <u>437</u> <u>310</u>	<del>791</del> <u>793</u>	<del>88</del> <u>95</u>	<del>290</del> <u>255</u>	<del>2624</del> <u>2822</u>
<b>Total for Plan Area</b>	<del>2017</del> <u>2654</u>	<del>232</del> <u>233</u> <u>265</u> <sup>CE</sup>	<del>874</del> <u>898</u> <u>650</u>	<del>2367</del> <u>2375</u> <u>2488</u>	<del>307</del> <u>321</u>	<del>640</del> <u>549</u>	<del>6437</del> <u>6470</u> <u>6927</u>
<b>Urban percentage</b>	<del>56.8%</del> <u>57%</u> <u>53.5%</u>	<del>38.2%</del> <u>48.7%</u>	<del>51.3%</del> <u>52.3%</u> <u>53%</u>	<del>67%</del> <u>66.6%</u> <u>68.1%</u>	<del>72%</del> <u>71.5%</u> <u>70.4%</u>	<del>55%</del> <u>54.7%</u> <u>53.5%</u>	<del>59.2%</del> <u>59.4%</u> <u>60%</u>
<b>Rural percentage</b>	<del>43.2%</del> <u>46.5%</u>	<del>62%</del> <u>61.8%</u> <u>51.3%</u>	<del>48.7%</del> <u>47.7%</u> <u>47%</u>	<del>33.4%</del> <u>31.9%</u>	<del>28.5%</del> <u>29.6%</u>	<del>45.3%</del> <u>46.5%</u>	<del>40.6%</del> <u>40.8%</u>

Table B: Anticipated Timing and Phasing of Allocated Sites

Settlement Tier	LDP 2 Reference	Site Name	Settlement	Total Units to be delivered in Plan period	Time lag to construction start			Phasing of Development (2023-2025 to end of 2033)													Units beyond the Plan period				
					Time period for pre-application discussions / PAC consultation	Time period for submission of planning application and determination	Time period for the discharge of relevant conditions to enable site construction	Number of units complete	Number of units UC	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-2033	2033					
Urban	HSG/040/LD P2/1	Former Library Community Education Centre Dew Street	Haverford west	22	Completed 2023	2024	2024	N/A	N/A	0	0	22	0	0	22	0	0	0	0	0	0	0	0	0	
Urban	S/HSG/040/LDP2/6	Slade Lane	Haverford west	330 487	N/A	N/A	N/A	N/A	N/A	0	5	50	15	35	35	35	30	30	30	20	680	312			
Urban	HSG/040/LD P2/3	Rear of 76 Pembroke Road, Merlins Bridge	Haverford west	51	2027	2028	2028	N/A	N/A	0	0	0	0	0	20	20	11	0	0	0					
Urban	HSG/086/LD P2/1	Land at Myrtle Meadows, Steynton	Milford Haven	60 65	2027	2028	2028	N/A	N/A	0	0	0	0	0	5	20	20	15	20	0	0				
Urban	HSG/086/LD P2/2	East of Castle Pill Road Steynton	Milford Haven	23	2025-2026	2026	2026-2027	N/A	N/A	0	0	0	0	8	10	5	0	0	0	0					
Urban	S/HSG/086/LDP2/3	South of Conway Drive, Castle Pill Road, Steynton	Milford Haven	117	2027	2028	2029	N/A	N/A	0	0	0	0	0	0	0	27	30	30	30				163	

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Settlement Tier	LDP 2 Reference	Site Name	Settlement	Total Units to be delivered in Plan period	Time lag to construction start			Phasing of Development (2023-2025 to end of 2033)													Units beyond the Plan period	
					Time period for pre-application discussions / PAC consultation	Time period for submission of planning application and determination	Time period for the discharge of relevant conditions to enable site construction	Number of units complete	Number of units UC	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-2033	2033		
Urban	HSG/086/LD P2/4	Former Hakin Infants' School	Milford Haven	14	2025	2026	2026	N/A	N/A	0	0	0	0	0	5	9	0	0	0	0		
Urban	HSG/086/LD P2/5	Former Hubberston VC School, Hakin	Milford Haven	26	2024	2025	2025	N/A	N/A	0	0	0	13	13	0	0	13	13	0	0	0	
Urban	HSG/086/LD P2/6	Former Hakin Junior School	Milford Haven	43	2025	2026	2026	N/A	N/A	0	0	0	0	0	3	15	15	10	0	0		
Urban	HSG/086/LD P/7	Land NE Beaconing, Steynton	Milford Haven	14	2026-2024	2024-2026	2025-2027	N/A	N/A	0	0	40	0	5	5	05	04	0	0	0	0	
Urban	HSG/086/002 22	Land SW of The Meads	Milford Haven	93	2024	2024	2025	N/A	N/A	0	0	10	20	20	20	23	0	0	0	0		
Urban	HSG/096/LD P2/1	Land at Hampshire Drive	Pembroke Dock	33	2024-2026	2024-2026	2025-2027	N/A	N/A	0	0	0	3	4	4	45	45	45	45	45	24	
Urban	HSG/096/LD P2/2	West of Stranraer Road, Pennar	Pembroke Dock	59	2027	2028	2028	N/A	N/A	0	0	0	0	0	0	14	15	15	15	0		

PEMBROKESHIRE COUNTY COUNCIL DEPOSIT LOCAL DEVELOPMENT PLAN 2017 -2033

Settlement Tier	LDP 2 Reference	Site Name	Settlement	Total Units to be delivered in Plan period	Time lag to construction start			Phasing of Development (2023-2025 to end of 2033)													Units beyond the Plan period
					Time period for pre-application discussions / PAC consultation	Time period for submission of planning application and determination	Time period for the discharge of relevant conditions to enable site construction	Number of units complete	Number of units UC	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-2033	2033	
Urban	HSG/096/00238	North of Pembroke Road	Pembroke Dock	38	2025-2026	2026	2026	N/A	N/A	0	0	0	8	8	8	8	6	0	0	0	7
Urban	<a href="#">HSG/096/LD P2/3</a>	<a href="#">Land south of Sycamore Woods and west of Lavinia Drive</a>	<a href="#">Pembroke Dock</a>	9	2026	2026	2027	N/A	N/A	0	0	0	0	4	5	0	0	0	0	0	0
Urban	HSG/095/LD P2/1	Between St Daniels Hill & Norgans Hill	Pembroke	147	2027	2028	2028	N/A	N/A	0	0	0	0	0	30	30	30	30	27	0	
Urban	HSG/095/LD P2/2	SW of Southlands , St. Daniels Hill	Pembroke	19	2029	2030	2030	N/A	N/A	0	0	0	0	0	0	0	0	0	10	9	
Urban	HSG/095/LD P2/4	East of Golden Hill Road	Pembroke	50	2026	2027	2027	N/A	N/A	0	0	0	10	15	15	10	0	0	0	0	
Urban	HSG/095/LD P2/5	SE of Southlands , St. Daniels Hill	Pembroke	26	2029	2030	2030	N/A	N/A	0	0	0	0	0	0	0	10	16	0		
Urban	HSG/095/00144	North of Gibbas Way	Pembroke	43	Completed 2023	2024	2024-2026	N/A	N/A	0	0	0	5	5	5	5	5	5	5	5	43

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Settlement Tier	LDP 2 Reference	Site Name	Settlement	Total Units to be delivered in Plan period	Time lag to construction start			Phasing of Development (2023-2025 to end of 2033)													Units beyond the Plan period
					Time period for pre-application discussions / PAC consultation	Time period for submission of planning application and determination	Time period for the discharge of relevant conditions to enable site construction	Number of units complete	Number of units UC	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-2033	2033	
Urban	S/HSG/034F/LDP2/1	Maesgwynne	Fishguard	175	2024	2025	2026 <sup>5</sup>	N/A	N/A	0	0	0	23	22	22	22	22	22	22	20	167
Urban	HSG/088/LDP2/1	North of Highfield Park & Parc Roberts	Narberth	89	N/A	Submitted 2024	2026 <sup>5</sup>	N/A	N/A	0	0	11	20	20	20	18	0	0	0	0	64
Urban	HSG/093/00066	East of Poppy Drive	Neyland	101	2024-2026	2024-2026	2025-2027	N/A	N/A	0	0	10	20	20	20	20	11	0	0	0	
Service Centre	HSG/020/LDP2/1	Land at Tan Ffynnon Fields	Cilgerran	50	2026	2027	2028	N/A	N/A	0	0	0	0	0	10	10	10	10	10	0	40
Service Centre	HSG/030/LDP/01	East of Waunaeron	Crymych	28	2027	2028	2028	N/A	N/A	0	0	0	0	0	0	8	10	10	0	0	
Service Centre	HSG/048/00038	North of Hayston View	Johnston	50	2025-2026	2026	2026	N/A	N/A	0	0	0	15	15	15	5	0	0	0	0	42 63
Service Centre	HSG/048/LDP2/1	Maes yr Ysgol	Johnston	13	2026	2026	2027	N/A	N/A	0	0	0	0	6	7	0	0	0	0	0	
Service Centre	HSG/050/LDP2/1	South of Rock Park, Kilgetty	Kilgetty	19	2026	2026	2027	N/A	N/A	0	0	0	0	5	7	7	0	0	0	0	
Service Centre	HSG/052/00011	South of Cleggars Park	Lamphey	55	N/A	Submitted 2024	2026 <sup>4</sup>	N/A	N/A	0	0	15	15	10	0	0	0	0	0	0	

PEMBROKESHIRE COUNTY COUNCIL DEPOSIT LOCAL DEVELOPMENT PLAN 2017 -2033

Settlement Tier	LDP 2 Reference	Site Name	Settlement	Total Units to be delivered in Plan period	Time lag to construction start			Phasing of Development (2023-2025 to end of 2033)														Units beyond the Plan period
					Time period for pre-application discussions / PAC consultation	Time period for submission of planning application and determination	Time period for the discharge of relevant conditions to enable site construction	Number of units complete	Number of units UC	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-2033	2033		
Service Centre	HSG/052/LD P2/1	Adjacent to Lamphey School	Lamphey	40	2027	2028	2028	N/A	N/A	0	0	0	0	0	0	8	8	8	8	8		
Service Centre	HSG/053/LD P2/1	Between Longstone Court and 62, Station Road	Letterston	38	2027	2028	2028	N/A	N/A	0	0	0	0	0	0	8	10	10	10	0		
Service Centre	HSG/063/LD P2/1	North of The Kilns	Llangwm	66	2024	2024	2025	N/A	N/A	0	0	10	15	15	15	11	0	0	0	0		
Service Centre	HSG/122/000 35	Awel y Mor extension	St Dogmaels	28	-N/A	Submitted 2024	2025-2028	N/A	N/A	0	0	0	0	0	0	4	8	8	8	0		
Service Village	HSG/003/LD P2/1	North of Begelly Farm	Begelly	46	2026	2027	2027	N/A	N/A	0	0	0	0	0	6	8	8	8	8	8		
Service Village	HSG/006/000 03	Adjacent to Hafod	Blaenffos	6	2024-2026	2024-2026	2025-2026	N/A	N/A	0	0	0	3	3	0	0	0	0	0	0	9	
Service Village	HSG/022/LD P2/1	Land at Dungleddy Court	Clarboston Road	19	2026	2027	2027	N/A	N/A	0	0	0	0	6	7	6	0	0	0	0		
Service Village	HSG/152/LD P2/1	South of Bro'r Dderwen	Clunderwen	31	2026	2027	2028	N/A	N/A	0	0	0	0	0	7	8	8	8	0	0	34-37	

PEMBROKESHIRE COUNTY COUNCIL DEPOSIT LOCAL DEVELOPMENT PLAN 2017 -2033

Settlement Tier	LDP 2 Reference	Site Name	Settlement	Total Units to be delivered in Plan period	Time lag to construction start			Phasing of Development (2023-2025 to end of 2033)														Units beyond the Plan period
					Time period for pre-application discussions / PAC consultation	Time period for submission of planning application and determination	Time period for the discharge of relevant conditions to enable site construction	Number of units complete	Number of units UC	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-2033	2033		
Service Village	HSG/029/00014	Opposite Woodholm Close	Crundale	15	2025-2026	2026	2026-2027	N/A	N/A	0	0	0	0	5	5	5	0	0	0	0		
Service Village	HSG/029/LD P2/1	West of Ashford Park	Crundale	22	2025	2026	2026	N/A	N/A	0	0	0	0	6	8	8	0	0	0	0	18	
Service Village	HSG/043/LD P2/1	Adjacent to Brackenhurst	Hill Mountain	15	2025	2026	2026	N/A	N/A	0	0	0	0	3	3	3	3	3	0	0	11 15	
Service Village	HSG/046/LD P2/1	Land at West End Cottages	Hundleton	14	2027	2028	2028	N/A	N/A	0	0	0	0	0	4	5	5	0	0			
Service Village	HSG/047/LD P2/1	South of The Crown	Jeffreyston	8 10	2027 2026	2028 2026	2028 2027	N/A	N/A	0	0	0	0	0 5	0 5	4 0	4 0	0	0	0		
Service Village	HSG/049/LD P2/1	East of Brookfield Close	Keeston	27	2025-2026	2026-2027	2026-2027	N/A	N/A	0	0	0	0	3	6	6	6	6	0	0		
Service Village	HSG/060/LD P2/1	Adjacent to Maesybryno	Llandissilio	26	2028	2029	2029	N/A	N/A	0	0	0	0	0	0	5	7	7	7	17		
Service Village	HSG/066/LD P2/1	East of Hazelbank	Llanstadwell	10	2028	2029	2029	N/A	N/A	0	0	0	0	0	0	5	5	0	0			
Service Village	HSG/081/LD P2/1	West of Globe Inn	Maenclochog	15	2024-2026	2025-2026	2025-2027	N/A	N/A	0	0	0	5	5	5	0	0	0	0	21		
Service Village	HSG/099/LD P2/1	Land at Coppins Park	Pentlepoir	11	2027	2028	2028	N/A	N/A	0	0	0	0	0	3	4	4	0	0			

PEMBROKESHIRE COUNTY COUNCIL DEPOSIT LOCAL DEVELOPMENT PLAN 2017 -2033

Settlement Tier	LDP 2 Reference	Site Name	Settlement	Total Units to be delivered in Plan period	Time lag to construction start			Phasing of Development (2023-2025 to end of 2033)													Units beyond the Plan period				
					Time period for pre-application discussions / PAC consultation	Time period for submission of planning application and determination	Time period for the discharge of relevant conditions to enable site construction	Number of units complete	Number of units UC	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-2033	2033					
Service Village	HSG/113/LD P2/1	South of Robeston Court	Robeston Wathen	5	2024-2026	2024-2027	2024-2028	N/A	N/A	0	0	2	0	0	2	0	0	0	0	0	0	0	0	0	0
Service Village	HSG/114/LD P/01	East of Pilgrim's Way	Roch	52	N/A	Submitted 2024	2024-2026	N/A	N/A	0	0	6	8	8	8	8	8	6	0	0	0	0	0	0	0
Service Village	HSG/119/LD P2/1	Land between Comerways and Austalise	Simpson Cross	18	2026	2027	2027	N/A	N/A	0	0	0	0	4	4	4	4	2	0	0	0	0	0	0	0
Service Village	HSG/120/000 18	NW of Wesley Way	Spittal	10	2025-2026	2026-2027	2026-2027	N/A	N/A	0	0	0	2	2	2	2	2	0	0	0	0	0	0	0	10
Service Village	HSG/123/LD P/01	North of Parsons Green	St Florence	20	2024-2026	2024-2026	2025-2027	N/A	N/A	0	0	0	4	4	4	4	4	0	0	0	0	0	0	0	0
Service Village	HSG/132/LD P2/1	West of Kings Park Farm	Templeton	14	2027	2028	2028	N/A	N/A	0	0	0	0	0	0	4	4	46	0	0	0	0	0	0	0
Service Village	HSG/135/LD P2/1	North of Bulford Road Bypass	Tiers Cross	6	2027	2028	2028	N/A	N/A	0	0	0	0	0	0	3	3	0	0	0	0	0	0	0	0
Service Village	HSG/149/LD P2/1	Land at Ford Farm	Wolfscastle	14	2027	2028	2028	N/A	N/A	0	0	0	0	0	0	4	4	4	2	0	0	0	0	0	0

Settlement Tier	LDP 2 Reference	Site Name	Settlement	Total Units to be delivered in Plan period	Time lag to construction start			Phasing of Development (2023-2025 to end of 2033)											Units beyond the Plan period		
					Time period for pre-application discussions / PAC consultation	Time period for submission of planning application and determination	Time period for the discharge of relevant conditions to enable site construction	Number of units complete	Number of units UC	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32		2032-2033	2033
<b>Totals</b>				2364 <del>2375</del> 2537				10,14	10,14	0	50	44876	203153	<del>276284</del> 298	<del>354364</del> 428	<del>408404</del> 460	<del>329325</del> 377	279312	<del>212244</del>	<del>107143</del>	986

Table C: Anticipated Timing of Sites with Planning Permission (2024-2033)

Settlement Tier	Development Monitoring Reference	Site Name	Settlement	Total Units	Number of units complete	Number of units remaining (NS + U/C - Post 2033)	Number of units UC	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33	2033	Units beyond Plan period
Urban	040/00431	Scarrowscant	Haverfordwest	181	172 181	9 0	90	9	-										
Urban	040/00397	141, Portfield	Haverfordwest	20 21	0 3	20 18	09	8	12	10	10								
Urban	040/00077	Kensington Gardens	Haverfordwest	133	83 84	49 5	3	3	2	5									44
Urban	040/00373	Calvary Church	Haverfordwest	8	0	8	0	-	4	4	4	4							
Urban	040/00430	Snooker Club	Haverfordwest	16	0	8	0	-	4	4	4	4							8
Urban	040/00106	Brooklands Park	Haverfordwest	21	3	18	0		6	6	6	6							
Urban	040/00445	7, Dew Street	Haverfordwest	5	0	5	0	-	5			5							
Urban	086/00129	Beaconing Drive, Steynton	Milford Haven	81	54 53	30 28	2 28	15	15	28									
Urban	086/00223	Thornton Rd	Milford Haven	117	107 117	10 0	10 0	10	-										
Urban	086/00377	Land at Milford Marina	Milford Haven	45 190	0	45	0	-	-			10	10	10	15				145
Urban	086/00378	132 Robert Street	Milford Haven	8	0	8	0	4	4		4	4							
Urban	086/00381	72-7870A-80A Charles Street	Milford Haven	15 24	0	15 24	0	-	7	8	8	8							
Urban	086/00282	Woodlands View	Milford Haven	7	3 6	4 1	0 1	4	-	1									
Urban	096/00373	Imble Lane	Pembroke Dock	100	0 100	100 0	30 0	40	40	20 0									

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Settlement Tier	Development Monitoring Reference	Site Name	Settlement	Total Units	Number of units complete	Number of units remaining (NS + U/C - Post 2033)	Number of units UC	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33	2033	Units beyond Plan period
Urban	096/00274	Land N of Cleddau Bridge Hotel	Pembroke Dock	5	0	3	1	1	1	1	1								2
Urban	096/00375	Land N of Cleddau Bridge Hotel	Pembroke Dock	14	0	7	0	-	-		2	3	2						7
Urban	096/00230	Hampshire Drive	Pembroke Dock	17	7 15	6 2	2	4	2	2									
Urban	095/00147	Land adjacent to Long Mains and Monkton Priory	Pembroke	70 238	30	70	0					10	15	15	15	15			138
Urban	095/00180	Green Haven, Monkton	Pembroke	30	7	11	0	-	3	3	3	2	3	3					12
Urban	095/00240	Springfield	Pembroke	5	3	2	0	-	2	2									
Urban	034/00165	West of Clossy-Bigney	Fishguard	50	0 50	50 0	0	5	30	15 0									
Urban	034/00165	Maesgwynne Farm Complex	Fishguard	5	0	3	1 0	1	2				1	2					2
Urban	034/00099	Delfryn, Heol Penlan, Stop & Call	Goodwick	9	0	5	0	-	3	2 3	2								4
Urban	034/00292	Main Street	Goodwick	26	0	26	2	5	11	10 5	11	10							
Urban	088/00077	Rushacre Gardens	Narberth	54	0	27	0	-	-	7 0	10	10	7						27

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Settlement Tier	Development Monitoring Reference	Site Name	Settlement	Total Units	Number of units complete	Number of units remaining (NS + U/C - Post 2033)	Number of units UC	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33	2033	Units beyond Plan period
Urban	088/00360	Old Narberth CP School	Narberth	11	3 11	8 0	0		4	4									
Urban	088/00074	Dingle Farm	Adjacent to Narberth	33	0	16	0	-	-				5	5	6				17
Service Centre	030/00043	Between the school and station road	Crymych	56	0 41	56 15	0 15	-	20	18 15	18								
Service Centre	030/00019	Crug yr Efydd	Crymych	26 27	20 22	7 5	2 0	3	4		3	2							
Service Centre	048/00017	Pond Bridge Farm	Johnston	123	69 84	54 39	14 0	20	15	15 0	4 0	15	4						
Service Centre	050/00043	Land to rear of Newton Hall	Kilgetty	19	0	19	06		5	7	7	5							
Service Centre	053/00034	Parc Maen Hir	Letterston	26	0 26	26 0	0		6	10	10								
Service Centre	053/00009	Phase 2, Court Meadow	Letterston	53	0 5	27 22	0 2	5	5	5 6	5 6	7 6	4						26
Service Centre	053/00052	Former Go Cart Track	Letterston	23	1 8	11 4	2 0	2	2	2	2	3 0							11
Service Village	007/00047	Old Station Yard	Boncath	30	0	20	0	-	-	7	7	6							10
Service Village	003/00040	North of New Road	Begelly	70	0	35	0	-	-						5	10	10	10	35
Service Village	003/00025	Barley Park Close	Begelly	26 21	6 16	20 5	3 5	10	10	5									
Service Village	025/00028	South of Tinker's Fold	Cosheston	6	0 4	4 2	2 1	2	2	1	1								

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Settlement Tier	Development Monitoring Reference	Site Name	Settlement	Total Units	Number of units complete	Number of units remaining (NS + U/C - Post 2033)	Number of units UC	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33	2033	Units beyond Plan period
Service Village	028/00012	North of the Forge	Croesgoch	23	0	23	0				6 7	8	8						
Service Village	029/00013	Dingle Lane	Crundale	40	39	1	0	-	4		1								
Service Village	029/00026	Woodholm Farm	Crundale	5	0	5	1	-	-					1	2				2
Service Village	033/00035	South West of Eglwysrwr School	Eglwysrwr	23	0	23	23	23	-										
Service Village	035/00030	Will Meadows	Freystrop	28	15	13	2	7	6	3	3	2							
	035/00021	Poplar Meadow	Freystrop	7	6	1	1	4	-	1									
Service Village	042/00013	North of Cartref	Hermon	15	0	8	0	-	-	2	3	3							7
Service Village	044/00050	Leven Close	Hook	13	12	1	0	4	-	1									
Service Village	044/00063	Cyfin Barn Farm	Hook	11	7	4	4	2	2	1									
Service Village	044/00015	Harcourt Close	Hook	40	12	14	0	-	14	4	4	2							14
Service Village	046/00015	Bowett Close	Hundleton	29	24	5	0	3	2	3	2								
Service Village	081/LDP/01	Ger Y Lein Fach	Maenclochog	13	11	2	0	-	2			2							
Service Village	081/LDP/01	Maes Roslyn	Maenclochog	13	0	13	0	3	5	5	5	3							
Service Village	085/00022	Parc Yr Odyn	Mathry	7	2	5	4	2	3	3	1								
Service Village	099/00045	Sycamore Close	Pentlepoir	6	3	3	0	4	2										

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Settlement Tier	Development Monitoring Reference	Site Name	Settlement	Total Units	Number of units complete	Number of units remaining (NS + U/C - Post 2033)	Number of units UC	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33	2033	Units beyond Plan period
Service Village	015/00024	Cornfields Walk	Sageston	100	70 100	30 0	30 0	30	-										
Service Village	015/00022	Sageston Fields	Sageston	38	34 35	7 3	0	4	3		3								
	119/LDP/01	East of Hill Lane	Simpson Cross	20	0 12	20 8	0 5	2	5	5	5	3							
Service Village	119/00028	Old Smithy Craft Centre	Simpson Cross	4	0	4	4	4	-	4									
Service Village	119/00030	Pembrokeshire Motor Museum	Simpson Cross	26	0	13	0		4	4	5	4							13
Service Village	123/00045	Ash Grove Gardens	St Florence	11 9	6 8	5 1	2 0	2	3			1							
Service Village	131/00021	Land adj Blaenffynnon Farm	Tegryn	30	4	13	1	2	5	6	5	6							12 13
<a href="#">Cluster Local Village</a>	<a href="#">154/00001</a>	<a href="#">Barnlake Point</a>	<a href="#">Barnlake</a>	<a href="#">22</a>	<a href="#">0</a>	<a href="#">11</a>	<a href="#">1</a>					5	6						<a href="#">11</a>
Cluster Local Village	011/00011	Hawn Lake	Burton	13	12	1	0	-	1		1								
Cluster Local Village	012/00004	Kiln Park	Burton Ferry	8 7	4 3	7 4	4 2	2	3	2	2								
Local Village	110/00015	Maes Elwyn John	Reynalton	7	5 6	2 1	1	2	-	1									
Local Village	125/00009	St Twynells Farm	St Twynells	5	0 1	2 1	2 1	2	-	1									3
Local Village	000/01202	Bluebell Lane	Wolfsdale	7	5 4	2 3	4 0	4	4		1	1	1						

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Settlement Tier	Development Monitoring Reference	Site Name	Settlement	Total Units	Number of units complete	Number of units remaining (NS + U/C - Post 2033)	Number of units UC	<del>2023-24</del>	<del>2024-25</del>	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33	2033	Units beyond Plan period
				2086		1069	152		27	176	97	67							539
				<u>2408</u>	830	<u>1094</u>	<u>153</u>	24	28	150	99	70	40	34					<u>536</u>
<b>Totals</b>				<u>2424</u>	<u>1237</u>	<u>650</u>	<u>109</u>	<u>5</u>	<u>18</u>	<u>159</u>	<u>135</u>	<u>146</u>	<u>46</u>	<u>36</u>	<u>43</u>	<u>25</u>	<u>10</u>	<u>10</u>	<u>537</u>

Table D: Housing Trajectory for LDP Deposit/Focussed replaced

LDP Year	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
A Year	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-2033	2033
B Remaining Years	17	16	15	14	13	12	11	10	9	8	7	6	5	4	3	2	1
C Total Housing Provision	6425	6425	6425	6425	6425	6425	6425	6425	6425	6425	6425	6425	6425	6425	6425	6425	6425
D Total LDP Housing Requirement	5840	5840	5840	5840	5840	5840	5840	5840	5840	5840	5840	5840	5840	5840	5840	5840	5840
E Actual Completions Large	231	299	226	286	261	283											
F Actual Completions Small	55	120	41	54	77	84											
G Anticipated Allocated Site Completions							0	50	148	203	275 284	354 361	408 404	329 325	279	212	107
H Anticipated Landbank Completions*							245	278 288	176 180	97 99	67 70	40 46	31	43	25	10	10
I Anticipated Completions Large Windfall							0	0	40	40	40	40	40	40	40	40	30
J Anticipated Completions Small Windfall							66	66	66	66	66	66	66	66	66	66	49
K Total Completions	286	419	267	340	338	367	311	394 404	429 433	405 407	447 459	496 512	544 540	477 473	409	327	196
L Average Annual Build Rate							269	344 350	372 376	354 353	388 398	430 444	472 469	414 410	355	284	170
M Total Projected Cumulative Completions	286	705	972	1312	1650	2017	2328	2724 2731	3154 3165	3556 3572	4003 4031	4499 4543	5044 5084	5524 5557	5930 5966	6257 6293	6453 6489
N Remaining Housing Completions	6139	5720	5453	5113	4775	4408	4097	3704 3694	3274 3260	2869 2853	2422 2394	1926 1882	1384 1341	904 868	495 459	168 132	-28 -64

Table D: Housing Trajectory for LDP Examination Version

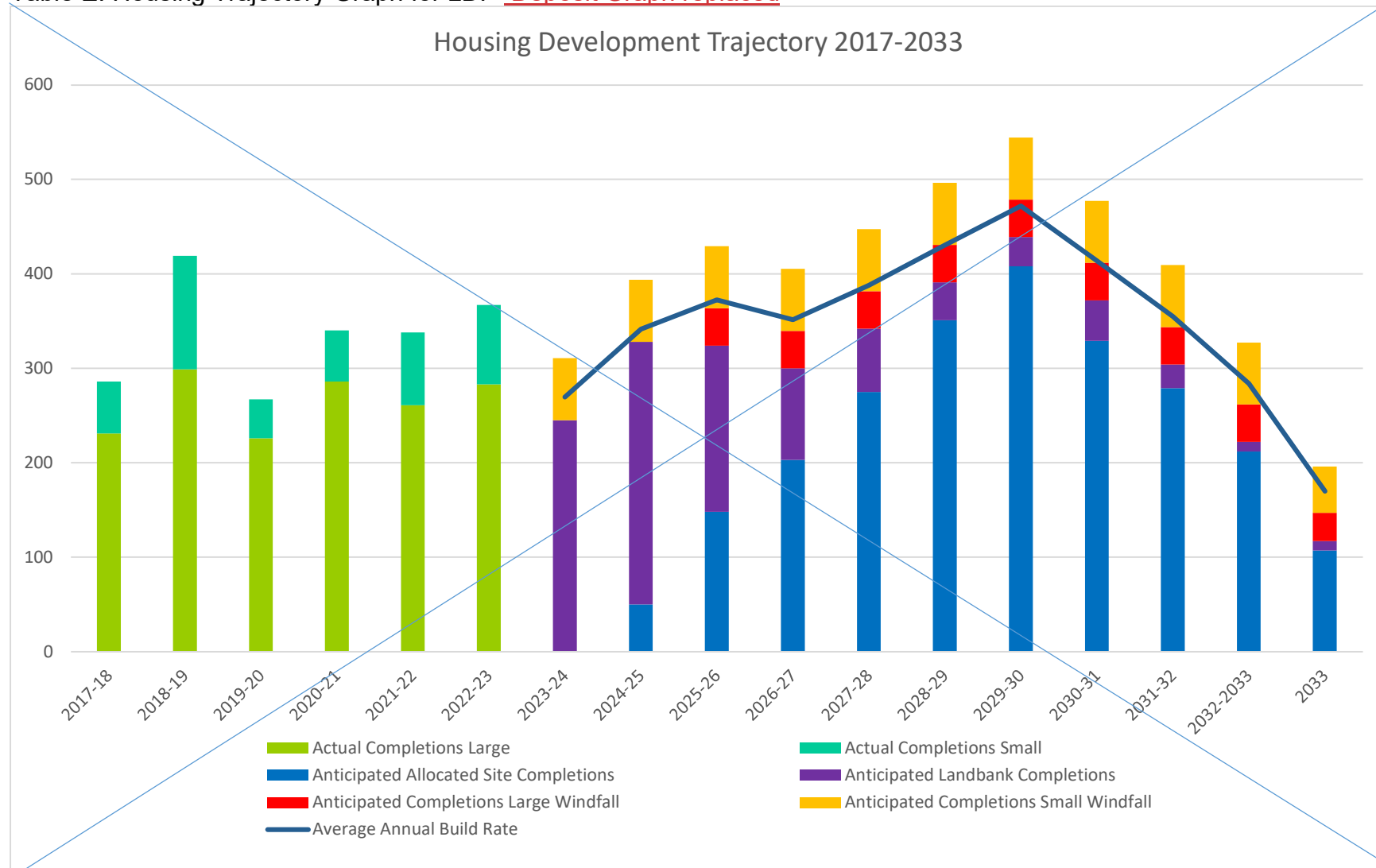
LDP Year	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	
A	Year	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-2033	2033
B	Remaining Years	17	16	15	14	13	12	11	10	9	8	7	6	5	4	3	2	1
C	Total Housing Provision	6425	6425	6425	6425	6425	6425	6425	6425	6425	6425	6425	6425	6425	6425	6425	6425	6425
D	Total LDP Housing Requirement	5840	5840	5840	5840	5840	5840	5840	5840	5840	5840	5840	5840	5840	5840	5840	5840	5840
E	Actual Completions Large	231	299	226	286	261	283	232	310									
F	Actual Completions Small	55	120	41	54	77	84	51	42									
G	Anticipated Allocated Site Completions									76	153	298	428	460	377	312	244	143
H	Anticipated Landbank Completions									159	135	146	66	36	43	25	10	10
I	Anticipated Completions Large Windfall									0	0	48	48	48	48	48	48	36
J	Anticipated Completions Small Windfall									63	63	63	63	63	63	63	63	47
K	Total Completions	286	419	267	340	338	367	283	352	298	351	555	605	607	531	448	365	236
L	Average Annual Build Rate									223	263	416	453	455	398	336	274	177

PEMBROKESHIRE COUNTY COUNCIL DEPOSIT LOCAL DEVELOPMENT PLAN 2017 -2033

M	<u>Total Projected Cumulative Completions</u>	<u>286</u>	<u>705</u>	<u>972</u>	<u>1312</u>	<u>1650</u>	<u>2017</u>	<u>2300</u>	<u>2652</u>	<u>2950</u>	<u>3301</u>	<u>3856</u>	<u>4461</u>	<u>5068</u>	<u>5599</u>	<u>6047</u>	<u>6412</u>	<u>6648</u>
N	<u>Remaining Housing Completions</u>	<u>6139</u>	<u>5720</u>	<u>5453</u>	<u>5113</u>	<u>4775</u>	<u>4408</u>	<u>4125</u>	<u>3773</u>	<u>3475</u>	<u>3124</u>	<u>2569</u>	<u>1964</u>	<u>1357</u>	<u>826</u>	<u>378</u>	<u>13</u>	<u>-223</u>

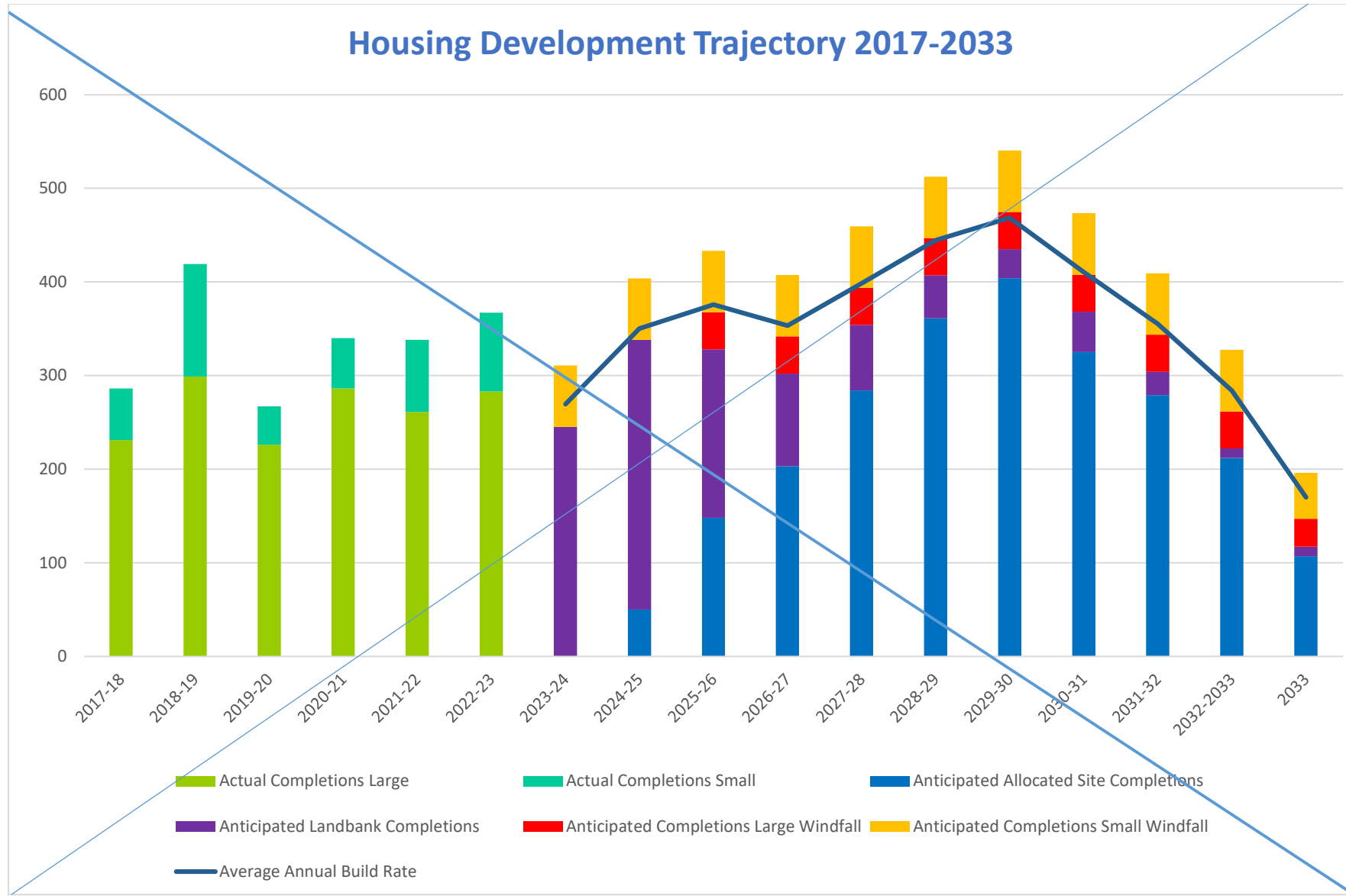
\*Only sites of 5 units or more have been included in the anticipated landbank completions, whereas Table A (Housing Supply) and Table F (Summary of Spatial Distribution of Housing) count all units under construction, leaving a difference in total figures.

Table E: Housing Trajectory Graph for LDP Deposit Graph replaced

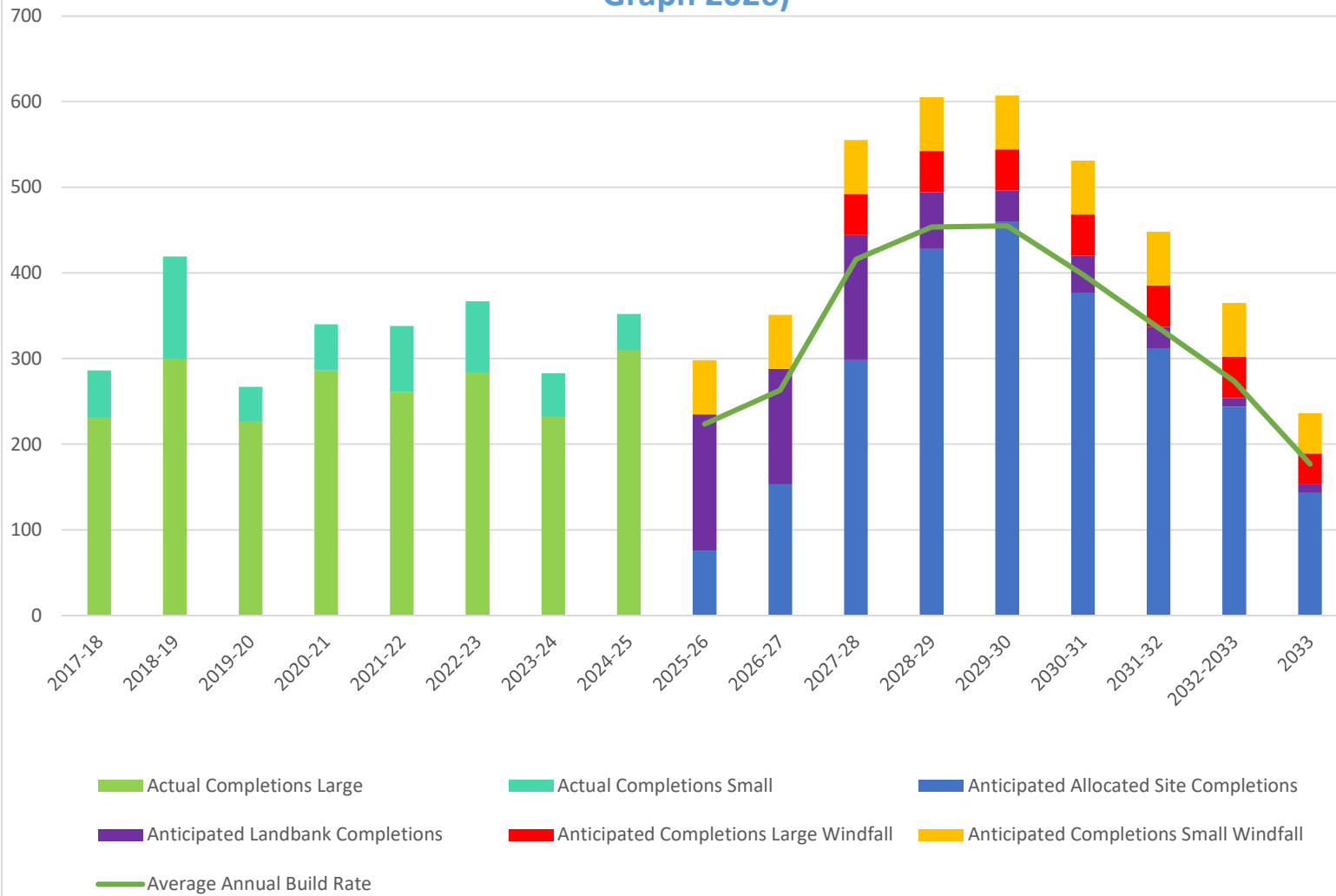


Deposit Graph replaced

### Housing Development Trajectory 2017-2033



### Housing Development Trajectory 2017-2033 (Matters Arising Change Graph 2026)



Matters Arising Changes March 2026 Graph



Table F Summary of Spatial Distribution of Housing

	Components of Housing Supply	Tier 1 Urban Towns	Tier 2a Service Centres	Tier 2b Service Villages	Tier 2c Local Villages	Countryside	Total
A	Total Completions (small and large)	970 <del>1145</del> 1421	192 <del>294</del>	479 <del>615</del>	41 <del>51</del>	160 <del>273</del>	2017 <del>2654</del>
B	Units under construction	89 <del>129</del>	20 <del>42</del>	86 <del>60</del>	9 <del>10 19</del>	28 <del>15</del>	232 <del>233</del> 265
C	Units with planning permission	461 <del>340</del>	184 <del>104</del>	221 <del>235</del> 185	8 <del>18</del> 21	0	874 <del>898</del> 650
D	New Housing Allocations	1576 <del>1582</del> 1695	387	404 <del>406</del>	0	0	2367 <del>2375</del> 2448
E	Large windfall sites (5+)	220 <del>226</del>	19 <del>24</del>	69 <del>71</del>	0	0	307 <del>321</del>
F	Small windfall sites (4 and less)	350 <del>294</del>	43 <del>36</del>	135 <del>118</del>	43 <del>40</del>	68 <del>61</del>	640 <del>549</del>
G	Total Housing Provision	3840	845	1394	101	256	6437

		<u>3846</u>	<u>887</u>	<u>1410</u>	<u>131</u>	<u>349</u>	<u>6470</u>
		<u>4106</u>		<u>1460</u>			<u>6938</u>

### Appendix 3: Supplementary Planning Guidance

Policy Reference	Topic	Existing SPG to be carried forward, subject to updating	New SPG	Timescale for preparation and adoption
GN 1 General Development Policy, GN 16 Residential Allocations	Development Sites and Infrastructure	N	Y	Prepared, consulted and adopted alongside LDP 2.
GN 56 Caravan, Camping and Chalet Development, GN 57 Site Facilities on Existing Caravan and Camping Sites	Caravan, Camping and Chalet Landscape Capacity Assessment SPG	N	Y	Prepared, consulted and adopted alongside LDP 2.
GN 20 Local Needs Affordable Housing	Affordable Housing	Y	N	Current adopted SPG, adopted September 2015. To be updated following adoption of LDP 2.
GN 3 Infrastructure and New Development	Planning Obligations SPG	Y	N	Current adopted SPG, adopted September 2016 to be updated following adoption of LDP 2.
SP 11 Countryside, <a href="#">SP12 Maintaining and Enhancing the Natural Beauty</a> GN 1 General Development Policy, GN 41 Protection of National Statutory Environmental Designations, GN	Biodiversity	Y	N	Current adopted SPG, adopted May 2021. To be updated following adoption of LDP 2.

Policy Reference	Topic	Existing SPG to be carried forward, subject to updating	New SPG	Timescale for preparation and adoption
44 Protection and Enhancement of Biodiversity				
GN 4 Resource Efficiency and Renewable and Low-carbon Energy Proposals, GN 5 Renewable Energy – target and allocations	Renewable Energy	Y	N	Current adopted SPG, adopted October 2016. To be updated following adoption of LDP 2.
GN 45 Green Infrastructure	Green Infrastructure	N	Y	To be prepared post adoption of LDP 2.
<del>GN 1 General Development Policy</del>	<del>Lighting and Dark Skies</del>	<del>N</del>	<del>Y</del>	<del>Working with PCNPA collaboratively.</del>
SP 11 Countryside	Landscape Character Assessment	Y, but process not completed	No, roll forward SPG for LDP 2	SPG for LDP 1 has been consulted on and needs to be reported to Cabinet. Then to be updated following adoption of LDP 2.
SP 11 Countryside	Joint SPG with Pembrokeshire Coast National Park Authority on Seascape Character	Y	No, roll forward SPG for LDP 2	SPG for LDP 1 adopted by PCC 2 <sup>nd</sup> October 2023. To be updated following adoption of LDP 2.
GN 28 Protection and Enhancement of the Historic Environment	Historic Environment (Archaeology)	Y	N	Current adopted LDP 1 SPG, adopted May 2021. To be updated following adoption of LDP 2.

<b>Policy Reference</b>	<b>Topic</b>	<b>Existing SPG to be carried forward, subject to updating</b>	<b>New SPG</b>	<b>Timescale for preparation and adoption</b>
GN 4 Resource Efficiency and Renewable and Low-carbon Energy Proposals	Cumulative Impact of Wind Turbines on Landscape and Visual Amenity	Y	N	Current adopted LDP 1 SPG, adopted 7 November 2022. To be updated following adoption of LDP 2.
GN 1 General Development Policy, GN 2 Sustainable Design	Parking Standards and ULEV Charging Points SPG	Y (only for parking standards)	Y as ULEV to be included	Current adopted SPG on Parking Standards, adopted June 2013. To be updated following adoption of LDP 2 with ULEV added.
GN 15 Housing Mix, Space Standards and requirement for Lifetime Homes Standards	Second Homes and Short-term lets in the Plan area	N	Y	To be prepared post adoption of LDP 2 and in accordance with emerging evidence on the topic area.
GN 15 Housing Mix, Space Standards and requirement for Lifetime Homes Standards	Residential Design	N	Y	To be prepared post adoption of LDP 2.
GN 47 Water Quality and Protection of Water Resources	Water quality and protection of water resources,	N	Y	To be prepared post adoption of LDP 2.
GN 16 and GN 18 – Slade Lane, Haverfordwest – HSG/040/LDP2/3	Slade Lane Masterplan	N	Y	A Masterplan is being commissioned by Welsh Government. This may provide a basis for submission of future planning applications and for preparation of SPG post adoption of LDP 2.

Policy Reference	Topic	Existing SPG to be carried forward, subject to updating	New SPG	Timescale for preparation and adoption
GN 16 GN 19a – Maesgwynne, Fishguard	Maesgwynne Masterplan	N	Y	A Masterplan for the undeveloped parts of the site is to be prepared by Wales and West Housing Association. This may provide a basis for submission of future planning applications and for preparation of SPG post adoption of LDP 2.
GN 16 GN 19B – South of Conway Drive, Castle Pill Road, Steynton – S/HSG/086/LDP2/3	South of Conway Drive Masterplan	N	Y	A Masterplan will need to be prepared by either the current owners or developer of the site. This may provide a basis for submission of future planning applications and for preparation of SPG post adoption of LDP 2.
SP 13 Port and Energy Related Development and Celtic Freeport	Freeport SPG	N	Maybe	Detailed consideration to be given to what is required post adoption of LDP 2.
GN 7 Cawdor Barracks including the former Brawdy Airfield	Development Brief for Cawdor Barracks including the former Brawdy Airfield	N	Maybe	Detailed consideration to be given to what is required post adoption of LDP 2.
GN 38 Safeguarding and Prior Extraction of the Mineral Resource	Prior Extraction Requirements	N (but noting that a Good Practice Advice Note is available)	Y	To be prepared post adoption of LDP 2.

## Appendix 4: Monitoring Framework

The Planning and Compulsory Purchase Act requires authorities to review those matters that may affect planning and development in their area. This process of monitoring constitutes the regular, continuous and systematic collection and analysis of information to measure and assess policy implementation, effectiveness and impact with a monitoring framework. Welsh Government require that all LDP's include a monitoring framework. The monitoring will feed into an Annual Monitoring Report (AMR) and this will also help inform a subsequent Plan Review, which will take place within 4 years of the Plan's adoption.

### Annual Monitoring Report

The Council is required to produce an Annual Monitoring Report (AMR) on its LDP to be submitted to Welsh Government for approval by 31st October each year. The Local Development Plan's objectives and policies will be monitored within the Annual Monitoring Report. These reports will monitor progress against key indicators and targets.

The AMR will identify whether the objectives of the Plan are being achieved and whether policies are being implemented as anticipated. If necessary, the AMR will outline steps that the Council intends to take to address any underperforming policies and proposals.

### Monitoring Indicators

The monitoring framework sets out a number of indicators that form the basis for assessing the Plan's performance in relation to the delivery of the Council's strategic objectives. These comprise indicators required by legislation such as housing land supply, key indicators applicable to all Plans such as employment land take up and other local indicators proposed by the Council.

For each Strategic Objective the Council has identified key policies that are likely to contribute to its achievement. Not every policy in the Plan will be monitored – only those critical to achieving the Plan's objectives. Each Indicator has a corresponding **target**. These targets are written to be specific, measurable and realistic. **Trigger Points** set out the point at which particular Indicators and the associated targets are not being met and therefore identifies the need to take action on a particular aspect of the Plan Strategy, or a policy. Potential **actions** are identified for each trigger point. The Monitoring Framework seeks to include the options from what action might be taken. These include:

- Continue monitoring
- Training required for Officers/Members
- Further Supplementary Planning Guidance required
- Further investigation/research required

- Policy Review required
- Plan review required

In addition to the Strategic Objectives, two contextual monitoring targets are identified which will provide information on the Welsh Language and Employment levels across the Plan area.

The Annual Monitoring Report will also contain a section on Sustainability Appraisal monitoring.

Objective	Key Policies/ proposals	Indicator	Target	Trigger Point	Source of Information	Action
A - Mitigate and respond to the challenge of Climate Change	GN 1 General Development	The scale/type of highly vulnerable development permitted within C2 flood risk areas (CORE)	Development in zones C1 & C2 is in line with the provisions of TAN 15	More than 3 approvals per year over 3 consecutive years of development in zones C1 & C2 contrary to the provisions of TAN 15.	Information from SDI reporting.	Training required for Officers/ Members
A - Mitigate and respond to the challenge of Climate Change	GN 5 Renewable Energy – target and allocations	The capacity (MW) of renewable energy development permitted.	6 MW per annum	If 10% below target for 3 consecutive years	PCC planning applications monitoring database.	Further investigation/ research required
A - Mitigate and respond to the challenge of Climate Change	GN 46 Coastal Change	Number of proposals gaining planning permission contrary to the provisions of the policy.	No applications approved contrary to the policy.	More than 3 approvals in 1 year contrary to the policy provisions over 3 consecutive years.	PCC planning applications monitoring database.	Training required for Officers/ Members
B - Deliver high quality development where placemaking is	SP1 Creating Sustainable Places	Number of applications approved contrary	No applications approved contrary to the policy.	More than 5 applications approved contrary to the policy in	PCC planning application	Training required for Officers/ Members

Objective	Key Policies/ proposals	Indicator	Target	Trigger Point	Source of Information	Action
supported by sustainable design which responds appropriately to cultural and built heritage, landscape and townscape.		to the provisions of SP 1 Creating Sustainable Places		1 year over 3 consecutive years.	s monitoring database.	
B - Deliver high quality development where placemaking is supported by sustainable design which responds appropriately to cultural and built heritage, landscape and townscape.	GN 2 Sustainable Design	Number of applications approved contrary to the provisions of GN 2 Sustainable Design	No applications approved contrary to the policy.	More than 5 applications approved contrary to the policy in 1 year over 3 consecutive years.	PCC planning application s monitoring database.	Training required for Officers/ Members, potential revision to Supplementary Planning Guidance.
C - Sustain and enhance the rural and urban economy by supporting start-up businesses, rural diversification, changing agricultural practices, the visitor economy, and the expansion of Small and Medium Enterprises.	SP 5 Supporting Prosperity GN 9 Employment Allocations	Employment land take-up allocations and job growth.(CORE)	100 ha of new employment land developed on employment allocations (ha/sq m)	Less than 45 ha developed by 2025 (Plan Review)	PCC Employment Land Survey	Further Investigation/ Research required. Potential Policy Review at Plan Review stage if further Investigation shows this to be necessary.
C - Sustain and enhance the rural and	SP 14 Strategic	The rate of development on	<ul style="list-style-type: none"> <li>Blackbridge</li> </ul>	More than 50% of identified strategic sites	PCC Employme	Further Investigation/

Objective	Key Policies/ proposals	Indicator	Target	Trigger Point	Source of Information	Action
urban economy by supporting start-up businesses, rural diversification, changing agricultural practices, the visitor economy, and the expansion of Small and Medium Enterprises.	Employment Provision	strategic allocations (CORE)	<ul style="list-style-type: none"> <li>Pembrokeshire Science and Technology Park Cluster</li> <li>Pembroke Dock Gateway Cluster</li> </ul> Planning permission on 50% of area of sites by 2025	area without planning permission by 2025	nt Land Survey	Research required. Potential Policy Review at Plan Review stage if further Investigation shows this to be necessary.
C - Sustain and enhance the rural and urban economy by supporting start-up businesses, rural diversification, changing agricultural practices, the visitor economy, and the expansion of Small and Medium Enterprises.	SP 17 Visitor Economy	Number of applications approved contrary to policy SP 17 Visitor Economy.	No applications approved contrary to policies	More than 4 approvals in a year contrary to the policy over 3 consecutive years.	PCC planning applications monitoring database.	Training required for Officers/ Members
D - Sustain resourceful communities by providing a range and mix of homes supported by key community facilities and services.	Policy SP 2 Housing Requirement	Number of net additional affordable and market dwellings built in the LPA area.(CORE)	Delivery of 5,840 total dwellings by 2033 (365 per year on average) as indicated in the Housing trajectory	If total number of dwellings built is less than 10% by formal Plan review undertake research if completions less than 25% of target by Plan review consider additional allocations	Annual PCC Housing Survey.	Further Investigation/ Research Required / Policy Review

Objective	Key Policies/ proposals	Indicator	Target	Trigger Point	Source of Information	Action
				and settlement boundary review.		
D - Sustain resourceful communities by providing a range and mix of homes supported by key community facilities and services.	Policy SP 6 Settlement Hierarchy	Spatial distribution of housing development (CORE)	60% of permissions are in the Urban Settlements	Permissions less than 50% in Urban Settlements over a period of 3 years.	PCC planning applications monitoring database.	Further Investigation/ Research Required.
D - Sustain resourceful communities by providing a range and mix of homes supported by key community facilities and services.	SP 3 Affordable Housing Target	Level of affordable housing completions monitored against the plan's overarching target (CORE)	Delivery of 2,000 new affordable dwellings (125 per year) by 2033.	If <a href="#">the</a> total number of dwellings built is <a href="#">less than</a> 25% below <a href="#">the</a> target of 125 <a href="#">dwellings per annum</a> for 3 years running. <a href="#">If the reasons for this affordable housing target not being met are as a result of the outcome of independent financial viability assessments then this aspect of affordable housing delivery, in particular, will require particular focus through the Annual Monitoring process.</a>	Annual PCC Housing Survey.	Further Investigation/ Research Required.
D - Sustain resourceful	SP 3 Affordable	Tenure of affordable housing	The tenure of affordable housing	If total completions are over 15% at variance to	Annual PCC	Further Investigation/

Objective	Key Policies/ proposals	Indicator	Target	Trigger Point	Source of Information	Action
communities by providing a range and mix of homes supported by key community facilities and services.	Housing Target	completions (CORE)	completions should be in line with the need identified in the LHMA.	LHMA need for 3 years running.	Housing Survey and S106 monitoring.	Research Required – depending on outcome potential review of Supplementary Planning Guidance and additional Officer/ Member training.
D - Sustain resourceful communities by providing a range and mix of homes supported by key community facilities and services.	GN 15 Housing Mix, Second Homes and Short-term Holiday Lets, Space Standards and requirements for Lifetime Homes Standards	Level of second homes and holiday let completions monitored against the Plan's vacancy rate allowance	Allowance (as opposed to target) of 520 holiday lets and second homes as part of the housing land supply (33 per year) by 2033.	If the total number of second homes and/or holiday lets built is greater than or equal to 50 units above the 8.1% vacancy rate allowance anticipated.	Annual PCC Housing Survey.	Further Investigation/ Research Required to include consideration of the use of planning conditions on a case-by-case basis.
D - Sustain resourceful communities by providing a range and mix of homes supported by key	GN 16 Residential Allocations and GN 20 Local Needs	Delivery of the affordable housing policy – thresholds and percentage targets for each	To monitor the delivery of affordable housing in line with policy targets and thresholds in each	If total completions are over 15% below targets in more than 50% of sub-market areas over 3 consecutive years.	Annual PCC Housing Survey and S106 monitoring.	Further Investigation/ Research Required – depending on outcome

Objective	Key Policies/ proposals	Indicator	Target	Trigger Point	Source of Information	Action
community facilities and services.	Affordable Housing	sub-market area (CORE)	sub-market area as set out in LHMA.			potential review of Supplementary Planning Guidance and additional Officer/ Member training.
<del>D – Sustain resourceful communities by providing a range and mix of homes supported by key community facilities and services.</del>	<del>GN 16 Residential Allocations and GN 20 Local Needs Affordable Housing</del>	<del>Viability (CORE)</del>	<del>To monitor trends (positive and negative) in key determinants of market conditions and viability such as, house prices, land values, build costs.</del>	<del>Should average house prices increase by 5% above the base price of 2023 levels sustained over 2 quarters then the Authority will consider other triggers identified in the Affordable Housing SPG &amp; may conduct additional viability testing &amp; modify the targets established in GN 16 &amp; GN 20</del>	<del>Land Registry Data</del>	<del>Further Investigation/ Research. Depending on outcome of further investigation could lead to Policy Review or Plan Review.</del>
D - Sustain resourceful communities by providing a range and mix of homes supported by key community facilities and services.	GN 18, GN 19A and GN 19B Strategic Residential Allocations	The rate of development on key allocations	Identify strategic housing sites and include targets in relation to planning permission and completion dates.	Slade Lane Phase 1 Haverfordwest (115 units) to be completed by 2027.  Slade Lane Phase 2 Haverfordwest (105 units) to have commenced by 2027	Annual PCC Housing Survey	Further Investigation/ Research.

Objective	Key Policies/ proposals	Indicator	Target	Trigger Point	Source of Information	Action
				and be completed by 2029.  Slade Lane Masterplan Haverfordwest (not including phases 1 and 2) to be completed by 2027. Phase 3 (notional 110 units) to have commenced by 2029		

Objective	Key Policies/ proposals	Indicator	Target	Trigger Point	Source of Information	Action
				<p>and be completed by 2033.</p> <p>Maesgwynne, Fishguard Masterplan to be completed by 2026. Phase 2 (notional 175 units) to have commenced by 2026 and be completed by 2033.</p> <p>South of Conway Drive, Steynton to be completed by 2028. Phase 1 (notional 117 units) to have commenced by 2030 and be completed by 2033.</p>		
<p>D - Sustain resourceful communities by providing a range and mix of homes supported by key community facilities and services.</p>	<p>GN 24 – Gypsy and Traveller Site Allocations and GN 25 Gypsy, Traveller and Showpeople’s Sites</p>	<p>Gypsy and Traveller sites completed (CORE)</p>	<p>Number of pitches built to meet the GTAA identified need over a 5 year period.</p>	<p>If total number of pitches permitted per year is 15% below the need identified at the end date of a GTAA.</p>	<p>Pembrokeshire Housing Team Gypsy Traveller Caravan Count</p>	<p>Further Investigation/ Research Required.</p>

Objective	Key Policies/ proposals	Indicator	Target	Trigger Point	Source of Information	Action
D - Sustain resourceful communities by providing a range and mix of homes supported by key community facilities and services.	SP 6 Settlement Hierarchy	Level of services within rural settlements.	Services in settlements within the settlement hierarchy are not significantly lower than in the 2020 Rural Facilities Survey	Monitor at Plan Review (2025) – a 10% change in number of settlements achieving service village level would require further investigation.	Updated Rural Facilities Survey in 2025	Further Investigation/ Research Required.
D - Sustain resourceful communities by providing a range and mix of homes supported by key community facilities and services.	GN 29 Community Facilities	Level of Community Facilities at settlements	No loss of viable community facilities at settlements.	Loss of 3 community facilities over 3 years contrary to policy GN 29	PCC planning applications monitoring database.	Further Investigation/ Research Required, potential for additional Officer/ Member training.
E - Build on the County's strategic location for green energy, maritime and port related development	SP 13 Port and Energy Related Development	Planning permission granted for employment development on allocated sites within identified port areas.	100% by end of Plan period	50% without planning permission at Plan Review (2027). Annual narrative to describe progress towards delivery	PCC Employment Land Survey	Further Investigation/ Research required.

Objective	Key Policies/ proposals	Indicator	Target	Trigger Point	Source of Information	Action
F - Protect and promote the Welsh language	SP 19 Welsh Language	Number of large windfall applications approved in Welsh language sensitive areas, supported by a Welsh Language Impact Assessment	Planning applications to be supported by a Welsh language Impact Assessment	Failure to submit a Welsh Language Impact Assessment	PCC planning applications monitoring database.	Further Investigation/Research required, potential for additional Officer/Member training.
G - Support a range of uses in Town Centres to assist regeneration	GN 31 Town Centre and Local Retail Centre Development	Percentage of ground floor vacant units in each Town Centre (within identified LDP boundary).	Vacancy levels are no higher than the national (Welsh) average	Vacancy levels 5% higher than national (Welsh) average over 3 consecutive years.	PCC Annual Retail Surveys; Published national statistics	Further Investigation/Research Required
H - Promote accessible and healthy environments for both people and wildlife through the protection and delivery of green infrastructure	GN 45 Green Infrastructure / GN 51 Protection and Creation of Outdoor Recreation Areas / GN 52 Protection of Open Spaces with Amenity value	Open Space/Green Infrastructure Indicator	To improve the network of green infrastructure, and maintain open space.	3 planning applications approved in any 3 consecutive years for any single policy GN 48, GN 51 and GN 52	PCC planning applications monitoring database.	Further Investigation/Research Required potential need for additional Officer/Member training.

Objective	Key Policies/ proposals	Indicator	Target	Trigger Point	Source of Information	Action
I - Improve access to goods and services by facilitating improvements in infrastructure and community facilities and directing development to sustainable locations.	GN 36 Transport Routes and Improvements	The delivery of key infrastructure that underpins the plan strategy. (CORE) - Progress towards delivery of safeguarded transport schemes	100% schemes delivered by 2033.	If the scheme is not programmed and / or finance has not been secured for a project by Plan Review (2025).	PCC Transportati on Section	Further Investigation/ Research Required.
I - Improve access to goods and services by facilitating improvements in infrastructure and community facilities and directing development to sustainable locations.	GN 3 Infrastructure and New Development	Number of affordable homes gaining planning permission through planning obligations.	11 per year	If less than 50% of target by Plan Review (2025).	Annual PCC Housing Survey	Further Investigation/ Research Required potential need for Officer/ Member training and/or revisions to Supplementary Planning Guidance.
J - Protect and enhance the County's environment, biodiversity and habitats	SP 12 Maintaining and Enhancing the Environment	Number of applications approved contrary to the criteria of the policy.	No applications approved contrary to the criteria of the policy.	More than 3 approvals in 1 year contrary to the policy provisions over 3 consecutive years.	PCC planning applications monitoring database.	Further Investigation/ Research Required.

Objective	Key Policies/ proposals	Indicator	Target	Trigger Point	Source of Information	Action
K - Prevent waste arising and ensure resources are used responsibly	SP 21 Waste Prevention and Management	Number of applications approved contrary to the criteria of the policy.	No applications approved contrary to the criteria of the policy.	More than 3 approvals in 1 year contrary to the policy provisions over 3 consecutive years.	PCC planning applications monitoring database.	Further Investigation/ Research Required / Training Required
<b>Contextual Indicators</b>	SP 19 Welsh Language	Welsh speaking % in County at Plan Review	Increase in numbers of Welsh speakers	Fall in number of Welsh speakers by over 5% compared to 2011 levels	Office of National Statistics	Continue monitoring
<b>Contextual Indicators</b>	SP 5 Supporting Prosperity	Unemployment levels	Reduce unemployment levels	Increase in Unemployment levels by over 5% in comparison with 2017 position.	Labour market statistics	Continue monitoring
<b>Contextual Indicators</b>	Progress towards delivery of the various items of Supplementary Planning Guidance set out in Appendix 3	No specific indicator, but a prioritised programme of SPG preparation will be prepared post adoption	No specific target	No specific trigger point	PCC	Continue monitoring

## Appendix 5: Policy GN 36 Transport Routes and Improvements – Programming Details for Safeguarded Transport Schemes

Scheme number	Title of Scheme	Programme	Finance	Expected delivery
TS/LDP2/03	Well Hill Improvement, Pembroke – re-aligned section of road	An unfinished part of the Southern Strategic Route, which is in the Joint Transport Plan for SW Wales 2015-2020	PCC has allocated £19,000 for a study of the old school site, including Well Hill, the re-use or re-development of which is integral to this proposal	Construction dependent on timing of re-use or re-development proposals for the adjacent site.
TS/LDP2/04	Milford Haven Public Transport Interchange	Joint Transport Plan for SW Wales 2015-2020	Potential for submission of a bid for Local Transport Network Fund grant	Funding bid to be submitted to Welsh Government to develop the scheme to GRIP 5 detailed design, with an aim to deliver the scheme within the Plan period.
TS/LDP2/05	Haverfordwest Train Station	Department for Transport: Access for All	A Department for Transport funding bid was successful and will be match-funded by Welsh Government and PCC	Construction will either be concurrent or immediately follow the construction of the Haverfordwest Public Transport Interchange.
TS/LDP2/08	Haverfordwest Public Transport Interchange (PTI)	South West Wales Metro	Welsh Government Local Transport Fund, with part match funding by PCC	The former multi-storey car park was demolished in 2023. The stage two construction contract for the Haverfordwest Public Transport Interchange (PTI) is likely to be awarded in 2024, with construction commencing once awarded.

**Appendix 6: Implementation Appendix New - see separate document**