

Pembrokeshire Local Development Plan 2 (2017-2033)

Schedule of Matters, Issues and Questions

Important Notes:

The purpose of the examination is to determine whether the Pembrokeshire Local Development Plan 2 2017 – 2033 (LDP) is sound in accordance with the Development Plan Manual, Edition 3, 2020 (The Manual).

To be sound the Plan must meet the tests set out in the Manual. These are: (1) Does the plan fit? (is it clear that the LDP is consistent with other plans), (2) Is the plan appropriate? (is the plan appropriate for the area in the light of the evidence), and (3) Will the plan deliver? (is it likely to be effective).

In addition, the LDP must have been prepared in compliance with legal and regulatory procedural requirements.

Participants should only respond to the questions below which directly relate to their previously submitted written representations on the Plan. Please clearly indicate in your statement(s) the question(s) you are answering.

Further statements should be proportionate in length to the number of questions being answered and should not, in total, exceed 3,000 words per matter.

Statements must be received by **12 noon on 23 October 2026**. Late submissions are unlikely to be accepted. Any statements of excessive length, or containing irrelevant or repetitious material, may be returned.

I am examining the LDP as submitted by Pembrokeshire County Council. Therefore, I will not, at this stage, be considering the merits for development of sites not included in the plan.

PEDW issued some preliminary questions (PQs) about the LDP and its preparation. The Council's detailed answers to the PQs are on the examination website (SD13.1) and may be of interest to participants. For clarity, where the PQs have been replicated in this document, the Council will not be required to provide an additional response, a reference to the earlier answer will be sufficient.

If you have questions in respect of this document or any aspect of the examination please contact the Programme Officer, Deborah Williamson, on 01437 775545 or by email at programmeofficer@pembrokeshire.gov.uk

Matter 1: Plan preparation and strategy

Issue: Is the LDP legally compliant, and is the Plan's strategy justified and likely to be effective in ensuring that Pembrokeshire's development needs can be met in a way that contributes to the achievement of sustainable development?

(Please note that, at this session, there will be no consideration of individual housing or employment sites or how the range of policies under consideration might apply to them. Such sites will be considered at Hearing Sessions 4, 5, 8 and 9 as applicable.)

Procedural compliance

1. Has the Plan been prepared in accordance with the approved Delivery Agreement (DA) and Community Involvement Scheme (CIS)?
 - a. Were there any deviations from the DA and CIS during the Plan's preparation?
 - b. Was consultation carried out in accordance with the CIS, including on the Focussed Changes? Was the consultation supported by the provision of appropriate, robust and credible evidence?
2. Has the Plan been subject to a robust Sustainability Appraisal/Strategic Environmental Assessment?
 - a. Do later changes proposed by the Council (e.g. through its Position Statement for the Marine Special Area of Conservation, and in response to our questions) trigger the need for a revised SA and if so, what is the risk that its conclusions would differ materially from the current report?
3. Do the changes to the Plan proposed by the Council post-deposit have any implications for the Equalities Impact Assessment?
4. How does the Plan's preparation and future implementation support the five ways of working identified in the Well-being of Future Generations (Wales) Act 2015?
5. How have the following documents and factors influenced the Plan's contents? If there has been no direct influence, is the Plan consistent with their key objectives?
 - a. The current housing strategy for Pembrokeshire (a draft is referred to in para 2.30 of SD27 – Local Housing Market Assessment 2023)
 - b. The South West Wales Regional Transport Plan
 - c. The Marine Area Statement (if applicable)
 - d. The Welsh National Marine Plan
 - e. 'Beyond Recycling', the Welsh Government strategy for waste
6. Is the Plan consistent with Future Wales: The National Development Framework?

7. Is the Plan compatible with those of neighbouring local planning authorities?
 - a. Has preparation of the Plan been informed by joint working and collaboration?
8. Have there been any significant changes in national policy or local circumstances since the focussed changes consultation?
 - a. What are the implications of any changes for the Plan?

Growth and spatial strategy

9. Is the vision positive and sufficiently aspirational? Is it unique to local circumstances?
10. How do the vision and objectives relate to the National Sustainable Placemaking Outcomes and local authority well-being objectives?
 - a. Should the Plan objectives refer to Pembrokeshire Coast National Park Authority?
11. Given the remaining time, is the Plan period 2017-2033 appropriate?
12. Does the Plan's spatial strategy represent an appropriate approach for delivering, managing and distributing growth over the Plan period?
 - a. Does the spatial strategy clearly communicate where future development will be located?
 - b. Does the evidence support a 60/40 urban/rural strategy over a 70/30 split? Has the Council maximised site opportunities in urban areas?
 - c. How has the spatial strategy applied the sequential approach to releasing land set out in national policy? Does it maximise the use of previously developed land?
 - d. Will the spatial strategy support Regional Growth Areas and the wider region?
 - e. How has Best and Most Versatile (BMV) agricultural land been considered through the Plan preparation stages? Is the approach supported by credible evidence and does it accord with national policy?
13. What is the purpose of the strategic policies? Are they useful and useable in development management terms?
 - a. Is Policy SP 1 justified? Does it duplicate provisions in other policies?
14. Is the settlement hierarchy based on robust evidence and will it guide development to the most sustainable locations in Pembrokeshire?
 - a. Has the evidence been applied consistently?
 - b. What is the rationale for the growth split between settlements and different hierarchy tiers?

- c. Is it clear what types and amount of development, other than housing, will be appropriate in each tier of the hierarchy?
 - d. How will windfall development be managed in each tier of the hierarchy?
- 15. Have the settlement boundaries been drawn appropriately to account for the planned growth?
 - a. Why have certain employment areas (such as at Withybush) not been included within a settlement boundary?
 - b. How have the Council dealt with suitable sites that fall below the allocation threshold?
- 16. Do Policies SP 8, SP 9 and SP 10 provide an appropriate framework for managing development?
- 17. Does Policy SP 8 provide a spatial dimension for development within the urban settlements?
- 18. Policy SP 9:
 - a. What is meant by an 'appropriate' scale and nature of development?
 - b. What types of well-related development adjacent to the settlement boundary would be supported, and how/why would they be exceptions?
 - c. How would the 'housing needs of the community' be measured?
 - d. Is it clear about the nature and scale of development that may be supported adjacent to settlement boundaries? Why would they be 'exceptions' if supported by other policies?
- 19. Policy SP10
 - a. What is the purpose of cluster villages? Are they justified based on evidence?
 - b. Does the policy clearly differentiate between cluster and local villages? Is it clear what types and scale of development would be supported within or adjacent to those villages?
- 20. Is Policy SP 11 clear on the types of development that would be supported in countryside locations?
 - a. Is it consistent with national policy?
 - b. Is it consistent with other Plan policies?
- 21. Is the site assessment process clear and transparent?
 - a. Is it founded on robust and credible evidence?

- b. Are the site allocations based on a robust assessment methodology that takes into account all potential constraints?
 - c. Have all infrastructure requirements been considered to ensure the timely deliverability of allocated sites?
- 22. How have rolled forward allocations been considered, given advice in the Development Plans Manual (Table 18)?
- 23. Policy SP 19
 - a. Is the policy clearly expressed, based on robust evidence, and consistent with national policy and guidance?
 - b. What are the implications of the Plan's growth strategy, including the amount and location of development, on the Welsh language?
 - c. How have allocated sites been assessed for their Welsh language impacts? What, if any, mitigation measures are required?
 - d. How will development be managed in language sensitive areas?
 - e. Is the Plan clear on when a Welsh Language Impact Assessment would be required, including its contents?
 - f. With reference to the Council's site delivery tables (ED 12), should allocations be subject to further Welsh language assessment?
 - g. Are the requirements for Welsh Language Impact Assessments clearly expressed and consistent with national policy?

Matter 2: Housing need, supply and affordable housing

Issue: Whether the Plan's housing strategy is justified having regard to the identified levels of need, is supported by robust and credible evidence and is consistent with national planning policy?

Housing (need and supply)

1. Is the housing requirement in Policy SP 2 appropriate and justified?
 - a. Why were the 3 housing scenarios chosen as a basis for the preferred growth scenario? Were other combinations considered?
 - b. Should the requirement be adjusted to account for the 2022-based local authority household projections for Wales?

- c. Should the requirement be increased to facilitate delivery of affordable housing to meet the needs in the Local Housing Market Assessment (SD27)?
 - d. What are the implications of the potential additional 1,000 jobs from the Celtic Freepoint bid on the housing requirement?
- 2. Is the housing land supply figure in Policy SP 2 appropriate and justified?
 - a. What is the latest make-up of the housing land supply?
 - b. How have rolled forward allocations been considered, given advice in the Development Plans Manual (Table 18)?
 - c. Is the housing trajectory realistic, based on delivery rates that are credible and robust?
 - d. Are the estimated yields from committed and windfall sites, in particular small windfall sites in local villages and the countryside, realistic and based on robust evidence? Has a non-delivery allowance been defined and applied appropriately?
 - e. How has the flexibility allowance been decided? Is it justified based on local circumstances?
- 3. Will the Plan deliver the housing requirement?
 - a. Is the rate of delivery contained in the housing trajectory realistic, based on robust and credible evidence and consistent with the requirements of the Manual?
 - b. Are the site allocations available and deliverable within the anticipated timescales? Are the allocations supported by a robust and comprehensive site assessment methodology, free from significant development constraints and demonstrated to be economically viable?
 - c. Do the site allocation total figures take account of Plan requirements such as recreation and amenity space, sustainable drainage systems, green infrastructure and tree replacement ratios, vehicle parking and sustainable design and placemaking?
 - d. Are the housing strategy and supply sufficiently flexible to respond to changing circumstances?
 - e. Should details of the housing allocations be included in the Plan?
- 4. Are the provisions of Policy GN 13 clearly expressed and consistent with the requirements of national planning policy?
 - a. Is a sentence missing before criteria 1-3 explaining where housing in the countryside will be supported?
 - b. Are the density levels appropriate and justified?

Affordable housing

- 5. Is the Local Housing Market Assessment (SD27) based on robust and credible evidence?
 - a. What scale of housing need has been identified?

- b. What tenure mix and dwelling types are required?
 - c. Is the Plan's affordable housing target appropriate given the evidence of local housing need?
 - d. What other mechanisms are available to contribute towards needs? How much could they realistically contribute?
- 6. Is the Financial Viability Report (SD28, ED10a and ED10c) based on robust and credible evidence?
 - a. Are the component assumptions on costs, values, planning obligations and other associated requirements realistic and justified?
- 7. Is the affordable housing target in Policy SP 3 realistic, up to date and based on robust evidence?
- 8. Are the affordable housing targets for provision in Policy GN 20, including contributions thresholds, realistic and justified?
 - a. Is the policy clear on where different thresholds and targets apply?
 - b. What evidence supports the exclusion of conversion schemes from contributions (para 5.117)? Should this be expressed in the policy?
 - c. How will partial units and off-site commuted sums be calculated and secured? Is the policy clear on these provisions?
 - d. Does the policy rely on Supplementary Planning Guidance to implement its provisions? Is this appropriate?
- 9. Does the spatial distribution of affordable housing reflect local needs?
- 10. Does the Plan make provision for affordable housing led housing sites (para 4.2.33 Planning Policy Wales)?
- 11. Are the provisions of Policy GN 21 clearly expressed and consistent with national planning policy?
 - a. Is the first two sentences of para 5.121 consistent with the policy aims?
 - b. Is the third criterion necessary, given the Plan spatial strategy and settlement hierarchy?

Matter 3: Water quality and protection of water resources

Issue: Does the Plan provide a framework for the protection of water resources and management of development affecting nutrient sensitive Special Areas of Conservation?

1. Does the Plan spatial strategy and Habitats Regulations Assessment accord with the Welsh Government Interim Planning Policy Statement on Development in Special Areas of Conservation (SAC) Rivers (August 2025)?
2. Does the Plan evidence demonstrate that an integrated approach is feasible during the Plan period?
3. Does the emerging Catchment Nutrient Reduction Plan (CNRP) provide sufficient detail and assurance that development can be delivered in accordance with the anticipated timescales?
4. Until such time that a CNRP is finalised, what approach and measures will be relied upon to ensure development can come forward in affected areas?
5. Does the Plan evidence identify necessary developer contributions that may be needed to improve and restore SACs? Have the impacts of likely costs on development viability been assessed?
6. Do the proposed changes to Policy GN 47, including the creation of a new strategic policy (SP12A), provide sufficient detail to conclude that a policy framework exists to prevent adverse effects on the integrity of affected SACs?
7. Are further amendments to the Plan necessary as a result of the latest evidence?
8. Is reliance on the production of Supplementary Planning Guidance to provide further detail on measures, mitigation, developer contributions and delivery, reasonable as a measure to conclude there would be no adverse effect on site integrity?
9. Does the Plan's monitoring framework provide the necessary assurances to ensure the above measures are brought forward?

Matter 4: Other housing policies and Gypsy and Traveller accommodation

Issue: Whether the Plan sets out an appropriate framework for the provision of Gypsy and Traveller accommodation and specific housing types including related controls, consistent with national planning policy?

Specialist and supported accommodation

1. Is Policy GN 15 sufficiently clear? Are the policy and supporting text consistent with, and based on, up-to-date evidence?
 - a. How would the 'local community' needs be determined within the first paragraph? Is this a reasonable basis upon which to assess needs?
2. Is criterion B effective?
 - a. How would an applicant demonstrate an 'appropriate mix' of housing types, tenures and bedroom numbers?
 - b. Given the evidence and provisions of other policies (GN20, GN21, and GN22) what are the expectations of this criterion and how would they be implemented?
3. Is criterion C effective?
 - a. How would an applicant be able to demonstrate an 'appropriate balance' of housing? How would this be applied by proposed use and/or location?
 - b. Would it provide a clear basis for evaluating applications to change between C3 and other residential uses as referred to in para 5.95?
4. Is criterion D effective?
 - a. Is it based on robust and up to date evidence?
 - b. Of the housing supply, how many dwellings could potentially be built to Lifetime Homes Standard?
 - c. What development cost assumptions have been made in the Financial Viability Report (SD28 and ED10a) to reflect the requirement for 20% of private units to meet Lifetime Homes standards or equivalent?
5. Is criterion E effective?
 - a. What is the justification for requiring all units to meet 'identified space standards'?
 - b. Is the policy clear on which standards apply to specific housing types?
 - c. Is it necessary to duplicate Building Regulations provisions within this policy?
6. Is the policy wording sufficiently flexible to respond to changing circumstances?
7. Does Policy GN22 provide a clear and consistent framework for assessing specialist and supported accommodation proposals?
 - a. How have the housing and accommodation needs assessments (SD24, SD25) and Local Housing Market Assessment 2023 (SD27) informed the policy approach?
 - b. Is the first criterion of Policy GN 22 (FC5.GN22.03) sufficiently responsive to wider-than-local needs? Why is it necessary to receive the Strategic Commissioning Team's support?
 - c. What is an 'appropriate' existing building?
 - d. What is the justification for allowing exceptions for children's homes (FC5.GN22.02)? Does the new paragraph after 5.128 align with the policy wording?

- e. Is the new sentence restricting market housing proposals outside settlement boundaries justified (FC5.GN22.03)?
- 8. Policy GN 23 allocated sites:
 - SSA/089/01 South west of Park House, Tenby
 - SSA/089/LDP2/01 East of Park House, Tenby
 - SSA/135/LDP2/01 North of Bulford Road Bypass, Tiers Cross
 - SSA/088/LDP2/01 Redstone, Narberth
 - a. Have the allocations followed a robust site assessment process, including a call for sites?
 - b. Could any constraints or adverse impacts be satisfactorily mitigated on each site?
 - c. To what extent would the allocations contribute towards addressing identified needs?
 - d. What are the mechanisms and timescales for delivering each allocation?
 - e. Should details of the allocations (ED12i) be included in the Plan?

Gypsy and Traveller accommodation

- 9. Does the approved GTAA 2019 provide a robust basis to inform the LDP strategy?
 - a. Should the Council allocate a transit site?
 - b. What is the status of the most recent GTAA?
- 10. Does the planned net gain in pitches from the three sites allocated under Policy GN 24 reflect the most up-to-date evidence of forecast need? Does the supporting text to Policy SP 4 reflect this latest evidence?
- 11. The Gypsy and Traveller Background Paper including Sites Assessment (SD51) sets out the process for identifying and assessing sites in and around Pembroke Dock and Pembroke.
 - a. Why was the assessment limited to Pembroke Dock and Pembroke?
 - b. Were other locations and sites considered?
- 12. Allocated sites:
 - GT/003/LDP2/01 Land west of Kingsmoor Common Gypsy and Traveller site, Begelly
 - GT/040/LDP2/01 Land east of Withybush Gypsy and Traveller site
 - GT/095/LDP2/02 Adjacent to Monkton Playing Field
 - a. Have the allocations followed a robust site assessment process, including a call for sites?

- b. Do the choice of sites, including their locations and relationship with neighbouring uses, align with evidence from the GTAA 2019, the Background Paper (paras 6.5 and 7.1) and Circular 005/2018?
 - c. Do the local authority allocations in terms of site location, size, and potential capacity, comply with Guidance for designing Gypsy and Traveller sites (July 2026)?
 - d. Could any constraints or adverse impacts be satisfactorily mitigated on each site?
 - e. Is it appropriate that land west of Kingsmoor is on common land? What are its implications for site delivery?
 - f. What are the mechanisms and timescales for delivering each allocation?
 - g. Should details of the allocations (ED12c) be included in the Plan?
13. Does Policy GN 25 provide a clear and consistent framework for assessing proposals?
- a. Is it consistent with national policy?
 - b. Are criteria 1 and 2 of Policy GN 25 realistic in conjunction with one another?
 - c. Is criterion 1 consistent with the approach for identifying sites in Circular 005/2018?

Matter 5: Economy

Issue: Whether the employment and economic strategies are supported by robust evidence and whether the Plan provides an appropriate and realistic policy framework in response to the issues and evidence?

Employment

1. How has the adjusted growth figure of 1,970 jobs over the plan period been identified in Policy SP 5? Is it based on up-to-date evidence and assumptions?
2. What assumptions have informed the economic forecast? Does this consider residents travelling to work from outside the County?
3. What methodology has been used to translate the jobs target into employment floorspace and land requirements? Does this align with national policy and guidance?
4. Does the underpinning economic development evidence follow national policy and guidance on Employment Land Reviews?
5. Policy SP 13
 - a. What is the evidence basis for the component parts of Policy SP 13?
 - b. What is the justification for excluding wind-related energy proposals and is this in general conformity with Future Wales Policy 32?
 - c. What is the purpose of paragraph 3 of the policy? Is it clear, focused and effective?

- d. Is it sufficiently clear to which area the policy would apply on the Proposals Map?
Is the extent of this area consistent with evidence?
6. Employment site allocations – Policies SP 14, GN 9 and GN 10
- a. Have the allocations followed a robust site assessment process, including a call for sites?
 - b. What is the basis for categorising sites into Policies SP 14 and GN 9?
 - c. Do both policies clearly differentiate between allocated and committed sites?
 - d. Do the allocation hectarages in policies SP 14, GN 9 and GN 10 take account of site constraints identified in the evidence?
 - e. Do the figures represent the totality of the available land or the expected uptake during the plan period?
 - f. Is there an estimate of jobs expected to be accommodated on each site and their contribution to the overall target?
 - g. Does the supply provide an appropriate range of site types, sizes, and locations to meet needs?
 - h. Does the distribution of employment sites have regard to the provisions of Future Wales?
 - i. Does it support the intended 60/40 urban/rural spatial strategy/distribution?
 - j. Are the policies clear on the expectations for acceptable uses on each site?
 - k. Policy SP 14 - What does 'other uses closely related to the main employment use' mean in scale and type/use?
 - l. Policy GN 9 – Is the final paragraph clear on circumstances where other uses may be supported? Is there a conflict between the current wording and the allocation of sites for B-use classes to meet identified needs?
 - m. How and when are the allocations in Policies SP 14, GN 9 and GN 10 anticipated to come forward? What is the justification for these assumptions?
 - n. Should details of the employment allocations (ED12b, ED12h and ED12j) be included in the Plan?
7. Policy GN8
- a. Is the policy consistent with Policy SP 11, national policy and guidance?
 - b. Criterion 1 – is 'above' and 'below' superfluous? Should Policy GN 7 be GN 9?
 - c. How would criteria 3 and 4 work in practice?
 - d. Criterion 4 – what does 'local area' mean?
 - e. Criterion 6 – should it refer to 'traditional' instead of 'agricultural' buildings?
 - f. Should the final sentence refer to criterion 2B and/or is it needed?
 - g. How would para 5.65 work?
8. Safeguarding employment sites (Policies SP 15 and GN 11)

- a. Are both policies sufficiently flexible and consistent with national policy and guidance?
- b. How and why have the sites listed in Policy SP15 been selected? Does the evidence support the likelihood of continued employment use?
- c. How would criteria a and b in Policy SP15 work in practice? What are 'exceptional circumstances'?
- d. Are the criteria in Policy GN 11 clear, effective and proportionate?
- e. Should the second bullet point in para 5.80 (under Policy GN 11) specify an indicative minimum period for the evidence in question?

Retail, leisure, community and tourism

Retail

- 9. Is Policy SP 16 based on robust evidence and consistent with national planning policy and guidance in respect of retail needs?
- 10. How have the findings of the South West Wales Regional Retail Study informed the Council's retail strategy?
 - a. Should the Plan include allocations for convenience and/or comparison goods floorspace?
 - b. Is the retail hierarchy based on credible evidence?
- 11. Are the town centre, primary and secondary retail frontage boundaries justified based on robust evidence? Do they respond appropriately to the Plan's issues and objectives?
- 12. Policy GN 31
 - a. Does the policy approach in primary frontages encourage and support each centre's vibrancy and viability? Is it consistent with national policy and guidance?
 - b. Is criterion A compatible with para 5.161? Should the reasoned justification on changes of use outside of primary frontages within town centres be included in the policy?
 - c. Is the policy clear and consistent on where residential uses will be supported within town centres and local retail centres? What criteria will be used to consider proposals on the ground floor of secondary frontages?
 - d. How is an 'unacceptable concentration of fast food takeaways' quantified? What is the evidence for this policy approach?
 - e. Criterion B - Does the policy provide adequate protection for retail and commercial uses in Local Retail Centres?
 - f. Should the reference to marketing in para 5.163 be included in the policy for clarity? Is it clear what existing and proposed uses this provision relates to?
- 13. Policy GN 32
 - a. Is the policy approach, including the detail in para 5.171, consistent with national policy's town centre first approach?
 - b. Is it coherent and consistent with Policy GN 57?

- c. How does para 5.172 relate to the contents of Policy GN 32? Should it be amended/moved?

14. Is the Council's retail strategy positive and sufficiently aspirational?

Community facilities and open space

15. Policy GN 29

- a. Criterion A – how is 'well related to the community' defined? Would this apply to countryside locations, and would this be consistent with Policy SP 11?
- b. Is criterion B clear and precise on its aims and how it would be implemented?
- c. Criterion C – would it be necessary to satisfy all criteria if changing use from one community facility to another? Is that effective and proportionate?
- d. Criterion C1 – is it clear how proposals can demonstrate they are no longer viable? How and why is this different from the provisions under criteria 2 and 3?
- e. Criterion C2 – Why should premises be vacant before they are marketed? Is this reasonable?
- f. Criterion C3 – how would proposals demonstrate they are surplus to requirements? Is this the same, or different, to having adequate alternative provision?

16. Policy GN 30

- a. How has the Plan identified the need for new community facilities? How has this evidence informed site allocation choices?
- b. Should details of the community facility allocations be included in the Plan?
- c. How and when are the allocations anticipated to come forward? What is the justification for these assumptions?

17. Policy GN 51

- a. Is the policy clear on its extent and scope? Does this extend beyond sites included on the Proposals Map?
- b. Criterion A – should deficiencies of outdoor recreation space also be a factor to consider?
- c. What is the Plan's approach for new open space, including standards of provision? Would new development be expected to contribute towards open space facilities?
- d. Para 5.291 – would playgrounds be covered under Policy GN 29 or GN 51?

18. Policy GN 52

- a. Is the scope of this policy justified? What evidence is it based on? Does this include any standards of provision?
- b. Is the policy clear on its requirements? What does 'adversely affect' mean in the policy?
- c. Is the extent of open space designated at Slothy Mill (Ref OSP/095/23 and Focussed Change FC5.GN52.Pembroke.01) justified?

- d. Is the amenity open space adjacent to housing allocation HSG/029/00014 (Opposite Woodholm Close, Crundale) justified?
19. Does Policy GN 53 provide an effective framework for the provision of community growing spaces?
- a. Criterion 1 – how would a proposal be ‘well-related’?
 - b. Criterion 2 – how would ‘local demand’ be measured?

Visitor economy

20. Does Policy GN 54 provide a clear and appropriate mechanism for the management of new visitor attractions and leisure facilities in the county?
- a. Should the reasoned justification clarify small, medium and large-scale proposals? Are there any differences between medium and large-scale proposals within the policy?
 - b. Does para 5.302 introduce new criteria (building on distinctiveness) that should be in the policy?
21. Do Policies GN 55, GN 56, GN 57 and GN 58 provide an appropriate framework for the management of visitor accommodation in the county?
22. Policy GN 56
- a. Is the Caravan Landscape Capacity Study (SD16.1 and SD16.2) robust and based on credible evidence? Does it provide a clear and effective approach to determine seasonal and static proposals in Policy GN 56?
 - b. Is the explanation of landscape capacity in paragraph 5.311 consistent with evidence in the Caravan Landscape Capacity Study?
 - c. Is the 400m threshold in paragraph 5.3.19 justified and effective? Does it apply to site extensions only?
 - d. Is Policy GN 56 and the reasoned justification clear on how cumulative impacts will be assessed?
 - e. Should criterion B refer to accessible locations as per criterion A?
 - f. How are ‘over-concentration’ and ‘area’ defined in criterion 2?
 - g. Para 5.312 – does this explanation risk delegating criteria for decisions on planning applications to SPG? Should the policy be amended to address the criteria in 5.312?
23. Policy GN 57
- a. What does ‘best practicable environmental standards’ mean in criterion 2? Are the requirements justified?
 - b. Does para 5.323 introduce new criteria that should be in the policy?
 - c. How would the policy operate alongside Policies GN 29 and GN 32?
24. Policy GN 58

- a. What is an appropriate balance of uses in the second paragraph? Would this apply to locations within settlements and open countryside?
- b. Why are local villages excluded from the policy? Is it consistent with the settlement hierarchy and sustainability principles?

Matter 6: Transport, energy, minerals and waste

Issue: Does the Plan provide a framework for the management of transport, energy and minerals and waste that is soundly based, justified and consistent with the requirements of national policy?

Transport

1. Do Policies SP20 and GN 36 provide a clear and consistent framework for the integration and coordination of sustainable transport measures and land use planning?
2. Does the Plan take advantage of opportunities to implement planned active travel routes?
3. How will the provision of vehicle and cycle parking be managed through the Plan?

Energy

4. Does the Plan's evidence base provide a robust basis to inform the development of renewable and low carbon energy policies, having regard to national planning policy?
5. Policy GN 4
 - a. Is Policy GN 4's aims to minimise resource demand, improve efficiency and optimise energy use consistent with PPW paras 5.8.4-5.8.5?
 - b. Are the policy's aims sufficiently clear and effective?
 - c. Is the reasoned justification at paras 5.38 to 5.42 relevant to the policy?
6. Policy GN 5
 - a. Have the allocations in Policy GN 5 appropriately considered site constraints, including best and most versatile agricultural land and peat?
 - b. Do the site hectarages reflect this?
 - c. Is there any conflict between both solar allocations and adjacent residential allocations?
 - d. How has the annual target of 9 MW been informed by assumptions relating to potential installed capacity on identified sites and Brawdy Airfield? Should the target be more ambitious?
7. Policy GN 6
 - a. Have the allocations followed a robust site assessment process?

- b. Is the reference to “local policies” in Policy GN 6 sufficiently clear?
- c. Should the policy provide support to appropriate renewable energy proposals, in line with Future Wales?

Minerals and waste

8. Do Policies SP18, GN 37, GN 38, GN 39 and GN 40 provide an appropriate framework for the management of mineral resources in Pembrokeshire, and are they consistent with national planning policy?
 - a. What is the latest position with the Statement of Sub-Regional Collaboration on minerals for the west Wales region (SD52.2)? What are the implications for the Plan?
 - b. Is the sand and gravel allocation (MN/000/LDP2/001 Trefign Quarry extension) justified, proportionate and deliverable?
 - c. Are the areas of search for sand and gravel under Policy GN 37 justified?
 - d. Are the safeguarded areas of minerals in Policy GN 38 justified? Do these areas include minerals related infrastructure (PPW 5.14.7)?
 - e. Is the meaning of ‘sensitive development’ clear in Policy GN 38?
 - f. Does Policy GN 40 provide clarity on its scope? Should it include a list of relevant minerals sites shown on the Proposals Map?
9. Do Policies SP 21, GN 59 and GN 60 provide an appropriate framework for sustainable waste management in Pembrokeshire, and are they consistent with national planning policy?
 - a. How have the sites listed in Policy GN 59 been identified? Should they be added to the Proposals Map?

Matter 7: Development management policies

Issue: Are the Plan’s policies for the management of the built, historic and natural environment, rural development and infrastructure provision soundly based, justified and consistent with national planning policy?

Development management policies

1. Policy GN 1:
 - a. Is criterion 1 clear and precise?
 - b. Should criterion 1 also refer to effects on “appearance” as well as character? Should it refer to “use”? Is the double reference to “location” necessary?

- c. Is the reference to “local amenity” in criteria 2A and 2B clear and proportionate? Should it refer only to “residential amenity”?
 - d. Is criterion 6 clear and precise about avoiding harm to the safety of highway users?
 - e. Is the reference to “(a harmful impact that cannot be satisfactorily mitigated)” necessary?
 - f. How would criterion 10 be applied? Does it duplicate criteria 2A and 2B?
 - g. Is criterion 12 duplicating Green Wedge controls? Should there be reference to harm?
- 2. How will the Plan apply the principles of sustainable placemaking contained in Policy GN 2?
 - a. Does criterion 2 duplicate provisions in Policy GN1 criterion 1?
 - b. Are the circular economy principles in criterion 2 justified?
 - c. Is criterion 9 clear on the standards being applied for ultra-low emission vehicle charging points?
- 3. How do the Plan’s general and design policies consider access, inclusivity and the needs of different user groups in development proposals?
- 4. Is the wording of Policy GN 28 consistent with relevant heritage statutory duties and national policy?
 - a. Is the policy locally distinct or does it duplicate national planning policy?
 - b. Paragraph 5.155 references a potential register of Historic Assets of Special Local Importance. Would Policy GN 28 provide an appropriate level of protection to such assets?
- 5. Policy GN 48:
 - a. Are the green wedge designations necessary and consistent with national planning policy?
 - b. Does the green wedge evidence (SD48 and ED14) assessment provide a robust and credible basis for identifying and defining the extent of each designation?
 - c. What is their justification over and above the policy framework restricting development in the countryside?
- 6. Does Policy GN 49 provide an appropriate mechanism for managing the impact of development on the characteristics and qualities of Pembrokeshire’s landscapes?
 - a. Is it based on robust and credible evidence?

Rural

- 7. Does Policy GN 14 provide an appropriate framework for assessing proposals for replacement dwellings in the countryside?
 - a. Is criterion 2 clear in its aims, including a building of local vernacular character?

8. Does Policy GN 33 provide an appropriate framework for assessing farm diversification proposals?
 - a. Is it consistent with other Plan policies on retail and visitor accommodation?
9. Are the requirements of Policy GN 34 concerning the use of traditional buildings in the countryside appropriate and consistent with national planning policy and guidance?
 - a. Given the policy title and scope, should criterion 2a also apply to employment proposals?
 - b. How are 'extensive alteration, expansion or rebuilding' defined?

Infrastructure

10. Is the Council's evidence sufficiently clear and robust in identifying the infrastructure required to deliver the Plan?
 - a. Does the Implementation Plan (ED10d) sufficiently address the provision in the Development Plans Manual to prepare an Infrastructure Plan?
 - b. Have its requirements been included in accompanying viability evidence to support delivery of the Plan?
 - c. Is there sufficient certainty that infrastructure can be delivered in line with anticipated timescales for site delivery, including the housing trajectory?
11. Does Policy GN 3 provide a clear and appropriate mechanism for securing new infrastructure from development?
 - a. Is the policy clear on how and when planning obligations will be secured?
 - b. Does the requirement for gigabit capable broadband duplicate controls in building regulations?
 - c. Is it appropriate to identify this as a second priority?
 - d. Should the reference to mains connections in paragraph 5.32 feature in the policy?
 - e. Should Welsh language infrastructure be added to the policy, given para 4.132?
12. Policy GN 27
 - a. How would the first paragraph be implemented?
 - b. Does the second paragraph duplicate controls in building regulations?
 - c. In the third paragraph, what happens if an applicant is unsuccessful in obtaining responses from providers?

Natural environment

13. Does Policy SP 12 provide a clear and consistent framework for maintaining and enhancing the natural environment?
 - a. Is it consistent with national policy, including Planning Policy Wales (PPW) paragraphs 6.4.15 and 6.4.25?
 - b. Is it clear, precise and capable of being implemented consistently?
 - c. Is it consistent with Policy GN 41?
14. Is Policy GN 41 locally distinct or does it replicate the provisions of national planning policy?
 - a. Is it sufficiently clear how Policy GN 41 would be applied to development outside the boundaries of protected sites?
 - b. Is the policy clear in its terminology, including sites of European importance?
15. Is Policy GN 42 consistent with the step-wise approach in national planning policy?
 - a. Is the reference in the final paragraph in Policy GN 42 sufficiently flexible?
16. Is Policy GN 43 consistent with PPW para 6.4.42?
17. Are the provisions of Policies GN 44 and GN 45 clearly expressed and consistent with national policy?
18. Is the deletion of Policy GN 46 justified, having regard to Technical Advice Note 15?

Matter 8: Site allocations: Cawdor Barracks and urban centres

Issue: Are the allocated sites soundly based and capable of delivering new residential development over the Plan period?

GN 7 Cawdor Barracks including the former Brawdy Airfield

1. What are the constraints affecting the site, and are these constraints significant obstacles to development within the Plan period?
2. In light of the constraints, and having regard to policy provisions for infrastructure including affordable housing and planning obligations, is the allocation economically viable?
3. Does the evidence give sufficient certainty about the scale and type of development anticipated to come forward?
4. Does the evidence give sufficient certainty about site delivery during the Plan period?

5. What are the mechanisms and timescales for delivering the site?
6. Is the site allocation essential to ensure the soundness of the Plan?
7. Would it be more appropriate to consider the site through a masterplan approach as Supplementary Planning Guidance?

GN 18 Slade Lane, Haverfordwest (S/HSG/040/LDP2/6)

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

GN 19B South of Conway Drive, Steynton (S/HSG/086/LDP2/3)

1. Is the site policy supported by detailed evidence to support its delivery, including Statement(s) of Common Ground? (DPM Table 18)
2. What are the constraints affecting the site, and are these constraints significant obstacles to development within the Plan period?
3. In light of the constraints, and having regard to policy provisions for infrastructure including affordable housing and planning obligations, is the allocation economically viable?
4. Having regard to site-specific evidence and relevant policies for on-site infrastructure and design-related matters, are the number of dwellings proposed realistic and deliverable over the Plan period?
5. What are the mechanisms and timescales for delivering the site?
6. Is the site allocation essential to ensure the soundness of the Plan?
7. Does the policy include all essential requirements to deliver the site?
8. Does the policy contain sufficient placemaking and master planning detail?

HSG/086/LDP2/1 (Land at Myrtle Meadows, Steynton)

HSG/095/LDP2/1 (Between St Daniels Hill & Norgans Hill, Pembroke)

HSG/095/LDP2/2 & HSG/095/LDP2/5 (South West/East of Southlands, St. Daniels Hill, Pembroke)

HSG/088/LDP2/1 (West of Bloomfield Gardens and North of Adams Drive & Highfield Park, Narberth)

HSG/093/00066 (East of Poppy Drive, Neyland)

1. What are the constraints affecting the site, and are these constraints significant obstacles to development within the Plan period?

2. In light of the constraints, and having regard to policy provisions for infrastructure including affordable housing and planning obligations, is the allocation economically viable?
3. Having regard to site-specific evidence and relevant policies for on-site infrastructure and design-related matters, are the number of dwellings proposed realistic and deliverable over the Plan period?
4. What are the mechanisms and timescales for delivering the site?
5. Is the site allocation essential to ensure the soundness of the Plan?

Matter 9: Site allocations: Service centres and service villages

Issue: Are the allocated sites soundly based and capable of delivering new residential development over the Plan period?

HSG/020/LDP2/1 (Land at Tan Ffynnon Fields, Cilgerran)

HSG/048/00038 (North of Hayston View, Johnston)

HSG/050/LDP2/1 (South of Rock Park, Kilgetty)

HSG/052/00011 (South of Cleggars Park, Lamphey)

HSG/052/LDP2/1 (Adjacent to Lamphey School, Lamphey)

HSG/003/LDP2/01 (North of Begelly Farm)

HSG/152/LDP2/1 (South of Bro'r Dderwen, Clunderwen)

HSG/043/LDP2/1 (Adjacent Brackenhurst, Hill Mountain)

HSG/047/LDP2/1 (South of The Crown, Jeffreyton)

HSG/066/LDP2/1 (East of Hazelbank, Llanstadwell)

HSG/132/LDP2/1 (West of Kings Park Farm, Templeton)

1. What are the constraints affecting the site, and are these constraints significant obstacles to development within the Plan period?
2. In light of the constraints, and having regard to policy provisions for infrastructure including affordable housing and planning obligations, is the allocation economically viable?
3. Having regard to site-specific evidence and relevant policies for on-site infrastructure and design-related matters, are the number of dwellings proposed realistic and deliverable over the Plan period?
4. What are the mechanisms and timescales for delivering the site?

5. Is the site allocation essential to ensure the soundness of the Plan?