Pembrokeshire County Council

Local Development Plan 2 (2017-2033)

Session 1

Tuesday 10 November 2026, 10:00 am

Plan Preparation and Strategy

Hearing Statement

Appendix A is the same document for each Session: It consists of:
Part 1: Policy Edits
Part 2: Minor Edits
Part 3: Proposals Maps Edits
Part 4: Other Edits

October 2026

PEMBROKESHIRE COUNTY COUNCIL

Session/Matter 1 – Plan Preparation and Strategy **Tuesday 10th November 2026 10:00am**	
	Officer Dealing
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?	LW (BS)
Closed **LPA Response:** 1 and 1 a and 1b: LDP2 has been prepared in accordance with the Delivery Agreement, including the Community Involvement Scheme. Reference is drawn to the Council's detailed answer set out in response to question 1a of the Preliminary Questions Statement (SD13.1[1]). Public consultation has been undertaken at each key stage of the Plan preparation process. Further details of all public consultations undertaken in conjunction with preparation of LDP 2 can be found in the Initial Consultation Report (SD09.8) and the Consultation Report (SD09.1) [2] submitted. These consultations were carried out in compliance with the relevant Community Involvement Scheme. It is important to note that the Delivery Agreement for the Plan had to be updated to take account of delays incurred by the Council. Below are listed all the versions of the Delivery Agreement that have been approved by Pembrokeshire County Council and agreed by Welsh Government: • 1st Edition – approved by PCC for submission to WG - 10th May 2018. • 1st Edition – agreed by WG - 7th June 2018. • 2nd Edition – approved by PCC - 8th October 2020. • 2nd Edition – agreed by WG - 30th October 2020. • 3rd Edition – approved by PCC - 11th May 2023. • 3rd Edition – agreed by WG - 20th June 2023. • 4th Edition – approved by PCC - 18th July 2024. • 4th Edition – agreed by WG - 24th July 2024.	

[1] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12084&language= SD13.1
[2] https://www.pembrokeshire.gov.uk/objview.asp?object_id=7473&language= - SD09.8 Initial Consultation Report
https://www.pembrokeshire.gov.uk/objview.asp?object_id=12026&language= - SD09.1 Consultation Report

The Delivery Agreements' Community Involvement Scheme was necessarily updated due to these time delays.

In terms of evidence of compliance, attention is drawn to Table 3 Summary of Engagement starting on page 8 of the Consultation Report[3] (SD09.1) which provides a useful summary of steps taken during engagement, who was involved, the methods of involvement and the completion dates.

The Consultation Report also flags where issues arose which were beyond the control of the Council:

- "where some groups identified for engagement are no longer actively meeting or have morphed into other groups." (para. 41)

- in Table 6: Seldom Heard Groups,, page 20 in relation to Gypsies, Travellers and Travelling Show-people and one proposed site visit: *"Whilst a meeting was arranged to attend the Haverfordwest site, the meeting did not take place at the request of the residents on site, because of an ongoing issue unrelated to the replacement LDP."*

There have been several formal consultations and multiple documents consulted upon. A summary list of evidence is provided below.

Pre Deposit Consultation

1. A Preferred Strategy – setting out a draft vision, objectives and the overall growth strategy as well as key policies for LDP 2.
2. A Review Report – setting out which parts of LDP 1 need to change and why.
- An Initial Sustainability Appraisal Report – setting out how the Preferred Strategy proposals have been assessed in terms of their potential social and environmental impacts.
- A Habitats Regulations Appraisal Screening Report – providing an assessment of whether or not the Preferred Strategy is likely to have impacts on Natura 2000 sites.
3. A Candidate Sites Register – showing all Candidate Sites proposing land for development and protection and the degree to which any of the proposals submitted is likely to accord with the Preferred Strategy.

Deposit Plan Consultation

1. Deposit Local Development Plan (LDP) 2
    - Written Statement containing the long-term vision, objectives, policies and proposals
    - Proposals Map
2. Sustainability Appraisal Report
    - Incorporates the Strategic Environmental Assessment (SEA)
3. Habitats Regulations Assessment (HRA)
4. Equalities Impact Assessment (EqIA)
5. Initial Consultation Report
6. Constraints Map
    - Available as an online, live document/resource

[3] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12026&language= SD09.1

7. Evidence Base ○ The evidence that informed the preparation of the Deposit LDP 8. Candidate Site Register / Site Assessment Report ○ Includes an interactive map ○ Sets out the outcome of the evaluation of each candidate site submitted during the plan review process 9. Review Report **Focussed Changes consultation:** 1. Schedule of Focussed Changes. The consultations were supported by the appropriate documentation. The robustness of the documentation has been tested through the various consultations and the Council's response to those consultations. It will be now tested through Examination. The LDP, and its supporting documents, have also been considered against the Derisking Checklist of Chapter 5 of the Development Plans Manual[4]. The recommended processes and requirements that are advised through this checklist have been satisfied. Commentary on how this has been achieved can be found in Appendix A to the Preliminary Questions documentation[5] (SD13.2) Appendix A - Derisking List.	
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?	MD
Closed **LPA Response:** The response to question 2 in the Preliminary Questions Statement (SD13.1) should be referred to (see pages 6 to 7 of that document). In summary, the Sustainability Appraisal concludes that, taking proposed mitigation into account, LDP2 is not expected to result in significant adverse environmental effects. The appraisal process was iterative and transparent, helping to improve the sustainability performance of the Plan through both option selection and mitigation measures. In response to Q2a above, the Position Statement for the Marine Special Area of Conservation (SD12.1)[6] was a standalone document and the implications for the Sustainability Appraisal were not set out by the Council. The subsequent Initial Questions letter (ED01[7]), Inspectors' Initial Letter to LPA 02.12.25, advised '*we note that the Council took the view that the focussed changes had no*	

[4] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12085&language= SD13.2
[5] (SD13.2) Appendix A - Derisking List
[6] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12082&language= SD12.1

implications for the Sustainability Appraisal (SA) undertaken on the Deposit Plan. If the Council proposes further changes to the LDP to address the matters raised above, it should confirm whether these (or other proposed changes) are likely to have significant implications for the SA.' See bottom of Page 7. The letter also raised a series of issues which required an update to the Habitats Regulations Assessment including the incorporation of the Position Statement (SD12.1[3]). Detailed requirements of the Council were set out in the Annex to the Inspectors' letter. In responding to the Inspectors' Initial Questions letter, the Council proposed a series of edits to the text of Local Development Plan 2 (with Focussed Changes) (SD14 [8]), Deposit Plan - Focussed Changes. This included edits as a result of the updated Habitats Regulations Assessment (ED09a to d [9]), HRA Examination Version. The implications of the proposed text edits are set out in Appendix D (ED09c) for the Sustainability Appraisal and are also set out in Appendix A[6] Part 1 Policy Edits to this Hearing Statement. In summary the edits reflect the recommendations of the Habitats Regulations Assessment which are intended to avoid adverse effects on sites of national nature conservation importance. This is positive. Policy would require measures to minimise pollution to protect health and should have a positive benefit. The Development Plan Manual (SD66)[10] page 78 Table 9 advises that: '*To ensure compliance with the SEA Directive and minimise risk of legal challenge, any changes made post deposit (Focussed Changes, Matters Arising Changes during examination, or those required by the Inspector) must be subject to assessment and made available for consultation.'* Were these proposed changes to Local Development Plan 2 by the Council agreed or any other further changes proposed the Sustainability Appraisal Assessment column which accompanies the change (as set out in Appendix A Part 1 Policy Edits for example) would be subject to consultation as part of the Matter Arising Changes consultation at the end of Examination.	
3. Do the changes to the Plan proposed by the Council post-deposit have any implications for the Equalities Impact Assessment?	TN (MD)
Closed **LPA Response:** The proposed changes to the LDP2 post deposit do not have any implications for the Equalities Impact Assessment (EqIA). The changes are limited and do not affect the generally positive impacts of the Plan. The context for answering this question is the Focused Changes proposed to the Deposit Plan	

[7] https://www.pembrokeshire.gov.uk/local-development-plan-review/examination-2025#:~:text=(ED01)%20Inspectors%20Initial%20Letter%20to%20LPA%2002.12.25 ED01
[8] https://www.pembrokeshire.gov.uk/local-development-plan-review/submission#:~:text=(SD14)%C2%A0Deposit%20Plan%20%2D%20Focussed%20Changes%C2%A0 SD14
https://www.pembrokeshire.gov.uk/local-development-plan-review/submission#:~:text=(SD14)%C2%A0Deposit%20Plan%20%2D%20Focussed%20Changes%C2%A0
https://www.pembrokeshire.gov.uk/objview.asp?object_id=12280&language= ED09a - d
https://www.pembrokeshire.gov.uk/objview.asp?object_id=12306&language=
https://www.pembrokeshire.gov.uk/objview.asp?object_id=12281&language=
https://www.pembrokeshire.gov.uk/objview.asp?object_id=12282&language=
[10] https://www.gov.wales/development-plans-manual-edition-3-march-2020 SD66

and with reference to the following: ▪ (SD05.1[11]) Front page and introduction to the Focussed Changes ▪ (SD05.2[12]) Part 1 - Focussed Changes ▪ (SD05.3[13]) Part 2 - Minor Edits ▪ (SD05.4[14]) Part 3 - Maps Booklet ▪ (SD05.5[15]) Part 4 - Other Edits SD05.2 identifies the impacts of those changes on the EqIA. These changes either have a neutral or positive impact on protected groups such as aligning the plan more closely with a particular need. Any Matters Arising Changes agreed during Examination will require further assessment regarding the implications for the EqIA.	
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?	BS
Closed **LPA Response:** LDP 2 has been prepared in accordance with the Well-being of Future Generations Act (Wales) (2015). Reference is drawn to the Council's answer set out in response to question 1b of the Preliminary Questions Statement (SD13.1[16]), which explains how the seven well-being goals are fully embedded into the Plan's objectives, vision and strategy (Table 1 of the LDP 2 Deposit Plan 2, page 31 (SD01.1[17])). The theme of well-being and the provisions of the Well-being of Future Generations Act 2015 is considered through the Sustainability Appraisal process and reflected in the use of the Local Well-being Goals in framing the strategic objectives and the strategic policies. The Plan has been developed through extensive engagement and partnership working with stakeholders, communities, infrastructure providers and neighbouring authorities, ensuring inclusive involvement. Further details on collaboration and involvement undertaken throughout the plan process are set out in the Deposit LDP 2 Consultation Report (SD09.1[18]). LDP 2 takes an approach based on planning for sustainable growth, affordable housing delivery, and support for resilient communities, to deliver longer term wellbeing outcomes. All formal stages of the LDP 2 plan preparation process have been subject to a Sustainability Appraisal which also fulfils the requirements and duties for the Well-being of Future Generations Act, including the five ways of working. Reference is also drawn to the Council's detailed answer set out in response to question 5B of the Preliminary Questions Statement (SD13[19]). This states how the LDP 2 Vision reflects key elements of the Pembrokeshire Well-Being Plan (originally 2018, but as revised in 2023).	

[11] https://www.pembrokeshire.gov.uk/objview.asp?object_id=11994&language= SD05.1
[12] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12021&language= SD05.2
[13] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12022&language= SD05.3
[14] https://www.pembrokeshire.gov.uk/objview.asp?object_id=11998&language= SD05.4
[15] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12023&language= SD05.5
[16] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12084&language= SD13.1
[17] https://www.pembrokeshire.gov.uk/objview.asp?object_id=11615&language= SD01.1
[18] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12026&language= SD09.1
[19] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12084&language= SD13.1

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) BS	
Closed **LPA Response:** 5a. The Council has previously provided a comprehensive update on the situation regarding the Pembrokeshire LHMA (in Examination Document ED08[20]). Reference is made to the LHMA 2021 (July 2021) (SD26[21]) and to the LHMA 2023 (March 2025, agreed by Welsh Ministers on 16/04/25) (SD27[22]). The latest LHMA (2023) is reflected through the combined provisions of various policies, particularly the following: SP 2 – Housing Requirement SP 3 – Affordable Housing Target GN 13 – Residential Development GN 15 – Housing Mix, Second Homes and Short-term Holiday Lets, Space Standards and requirements for Lifetime Homes Standards GN 16 – Residential Allocations GN 17 – Residential Commitments GN 18, GN 19A and GN 19B – essentially a master-planning policy approach for the three largest residential allocations in the Plan area GN 20 – Local Needs Affordable Housing GN 21 – Exception Sites for Local Needs Affordable Housing It is also worth noting that there are further policies relating to specific types of accommodation provision, for instance specialist and supported accommodation and accommodation for Gypsies, Travellers and Show-people. Hence, the latest LHMA has strongly influenced the content of LDP 2 but noting that Focussed Changes have been proposed, and Matters Arising Changes are being proposed to bring LDP 2 into conformity with the Pembrokeshire LHMA 2023. As ED08[23] is already published on the Examination website, its content is not repeated here. The section addressing matters relating to the Pembrokeshire LHMA commences on page 32 of that document. Appendix A Part 1 Policy Edits lists the Matters Arising Changes [c] the Council consider are needed.	
b. The South West Wales Regional Transport Plan BS	
Closed **LPA Response:** 5b. The South West Wales Regional Transport Plan[24] has recently been prepared and published by the SW Wales CJC and was approved by the (then) Cabinet Secretary for North Wales and Transport on 30th September 2025. It came into effect on that date	

[20] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12279&language= ED08
[21] https://www.pembrokeshire.gov.uk/objview.asp?object_id=10378&language= SD26
[22] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12043&language= SD27
[23] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12279&language= ED08
[24] https://southwestcjc.gov.wales/media/sw3bocr2/59688-regional-transport-plan-publication-english-full-rtp-accessible.pdf

and will be replaced in 2030. Submission of PCC's LDP 2 to Welsh Government was completed on 10th October 2025 and the LDP 2 Examination commenced on 15th October 2025. Hence, this new regional plan is not referenced in the version of LDP 2 put forward for Examination. LDP 2 currently has two policies which relate explicitly to transport, these being SP 20 (Transport Infrastructure and Accessibility) and GN 36 (Transport Routes and Improvements). It is also mentioned directly and indirectly in other policies, such as GN 1 (General Development Policy) and GN 2 (Sustainable Design and Placemaking). These policies are consistent with PPW edition 12[25] and with TAN 18 Transport[26] (and noting that the latter is currently being reviewed). The transport policies of LDP 2 reflect the earlier Joint Local Transport Plan for South West Wales 2015-2020, prepared by the Local Authorities in SW Wales. It also reflects the transport investment programmes of Welsh Government (for instance on Trunk Roads) and the County Council (on Local Roads), as well as those of other transport providers, such as Network Rail. It further reflects sustainable travel initiatives and related legislation (in particular the Active Travel (Wales) Act 2013). As currently drafted, SP 20 is the LDP 2 strategic policy on transport, and GN 36 has a criteria-based element (for assessing transport proposals requiring planning permission) and a safeguarding element (with 4 schemes identified for safeguarding). It is considered that LDP 2 is consistent with Llwybr Newydd, the Wales Transport Strategy, 2021[27]. Looking in detail at the new SW Wales Regional Transport Plan, it is reflective of much of the same policy and evidence as has informed PCC's LDP 2.

However, there are important updates / new information on schemes which require consideration in this response. National Transport Delivery Plan[28] schemes are listed, and while many of these do not relate directly to land use planning, there are several that do. PCC has identified the following:

a) SRN 4 – Llanddewi Velfrey to Redstone Cross improvement – A.40 trunk road – a completed scheme (opened in 2025),
b) SRN 6b (Fishguard to Cardigan – but no scheme details at present) and
c) SRN 6c (Haverfordwest – again, no scheme details at present).
These all relate to the trunk road network. There are also some third-party schemes, including:
d) Network Rail / TfW Lamphey Rail Sidings Scheme (anticipating improved rail sidings at Lamphey to support freight delivery for Celtic Freeport and including a potential maintenance shed – no further details currently),
e) SWTRA Lower Town Fishguard (A.487 trunk road) new road scheme to remove pinch points on the trunk road – no further details currently) and
f) Pembrokeshire Travel Corridor A4075 / A477 / B4319 around Pembroke – moving towards WelTAG stages 1 and 2 – (to support Freeport development – no further details currently).

More generally, there are various references to the Pembrokeshire Ports (Milford Haven and Fishguard) and to the Celtic Freeport. To conclude, PCC has not identified any inconsistencies between its LDP 2 approach to transport matters and the new SW Wales Regional Transport Plan. Although new scheme details are included in the latter, these are currently without detailed spatial definition or funding, and there is uncertainty

[25] Planning Policy Wales(SD80)
[26] Technical Advice Note (TAN) 18: Transport (SD98)
[27] Llwybr Newydd: the Wales transport strategy 2021 | GOV.WALES
[28] National Transport Delivery Plan 2022 to 2027

over whether they will happen within the LDP 2 plan period, although some of them might do so. Hence, a need for further safeguarding through LDP 2 is not identified. No Matters Arising Changes are proposed at this stage, but we would welcome the Inspector's thoughts on whether the SW Wales Regional Transport Plan should be mentioned in LDP 2 and whether it should be listed as an Examination Document.	
c. The Marine Area Statement (if applicable)	
Closed **LPA Response:** 5c. The LDP 2 Deposit Plan with Focussed Changes is broadly consistent with the main objectives of the Marine Area Statement[29] published by Natural Resources Wales. Both documents: ▪ Place climate change at the centre of decision-making; ▪ Focus on the protection and enhancement of green infrastructure and healthy ecosystems; ▪ Allow for progression towards renewable energy; ▪ Support sustainable economic development; and ▪ Provide a policy approach consistent with sustainability and the well-being of future generations. The Objectives and Policies of LDP 2 (with Focussed Changes) are intended to help manage and mitigate potential impacts on the marine environment.	
d. The Welsh National Marine Plan SH	
Closed **LPA Response:** 5d. LDP 2 Deposit Plan with Focussed Changes is broadly consistent with the main objectives of the Marine Area Statement published by NRW. Both documents: ▪ Place climate change at the centre of decision-making; ▪ Focus on the protection and enhancement of green infrastructure and healthy ecosystems; ▪ Allow for progression towards renewable energy; ▪ Support sustainable economic development; and ▪ Provide a policy approach consistent with sustainability and the well-being of future generations. The Objectives and Policies of LDP2 (with Focussed Changes ED15f[30]) are intended to help manage and mitigate potential impacts on the marine environment.	
e. 'Beyond Recycling', the Welsh Government strategy for waste[31] TN	
Closed **LPA Response:** 5e. LDP 2 Deposit Plan with Focussed Changes is broadly consistent with the Key Objectives of the 'Beyond Recycling' document. Both documents promote: • Resource efficiency • A circular economy • Waste reduction	

[29] https://naturalresources.wales/about-us/what-we-do/strategies-plans-and-policies/area-statements/marine-area-statement/?lang=en
[30] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12305&language= ED15f
[31] https://www.gov.wales/sites/default/files/publications/2021-03/beyond-recycling-strategy-document.pdf

• Climate change mitigation.	
6. Is the Plan consistent with Future Wales: The National Development Framework?	BS
Closed **LPA Response:** Yes, it is the Council's view that LDP 2 is in general conformity with the National Development Framework. Since 2020, Welsh Government has published both Future Wales – The National Plan 2040 (Future Wales), and updated editions of Planning Policy Wales (with edition 12 the latest). The Council has prepared a detailed answer to this question in response to questions 4 and 5A of the Preliminary Questions Statement (SD13.1[32]). This includes a detailed assessment of significant changes since publication of the LDP 2, Deposit Plan 2, and how a review of national policy and guidance in light of the submission of the LDP 2 has highlighted where a change to the plan could be made to achieve better conformity.	
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?	BS
Closed **LPA response**: The PCC Delivery Agreement (version 4) (SD06[33]) refers to the possibility of joint plans with neighbouring authorities in paragraph 1.20. In particular, the possibility of a joint plan with the Pembrokeshire Coast National Park Authority is referenced, but rejected for various reasons, including the differing timescales that the respective authorities were working to on their replacement LDPs. As made clear in Appendix A1.1 of that document, there is an expectation that an authority's LDP will be compatible with that of neighbour authorities and PCC considers that this requirement has been met. In terms of consultation on its emerging LDP 2 plan policies and proposals, a number of the submission documents set out the details, including SD09.1 [34]- Consultation Report, and SD09.8 [35]Preferred Strategy Initial Consultation Report. PCC has, wherever feasible, prepared joint evidence base documents with neighbouring authorities, covering a range of topics. Examples include the Green Infrastructure Plan June 2018 (PCC/PCNPA, SD20.1[36]), the Pembrokeshire Green Infrastructure Assessment 2023 (PCC/PCNPA, SD20.2[37]), The Two County Economic Study for Carmarthenshire and Pembrokeshire (PCC, Carmarthenshire CC, PCNPA and BBNPA – SD19.1 to 19.6 [38]inclusive), The Pembrokeshire GTAAs for 2015 (SD22[39]) and 2019 (SD23[40]) - PCC and PCNPA, the Pembrokeshire LHMAs for 2021 (SD26[41]) and 2023 (SD27[42]) (PCC and	

[32] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12084&language= SD13.1
[33] https://www.pembrokeshire.gov.uk/objview.asp?object_id=11509&language= SD06
[34] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12026&language= SD09.1
[35] https://www.pembrokeshire.gov.uk/objview.asp?object_id=7473&language= SD09.8
[36] https://www.pembrokeshire.gov.uk/conservation/green-infrastructure SD20.1
[37] https://www.pembrokeshirecoast.wales/pembrokeshire-green-infrastructure-assessment/ SD20.2
[38] https://www.pembrokeshire.gov.uk/local-development-plan-review/submission#:~:text=(SD19.1)%C2%A0Two,2020%2D21%20update SD19.1-SD19.6
[39] https://www.pembrokeshire.gov.uk/objview.asp?object_id=3786&language= SD22
[40] https://www.pembrokeshire.gov.uk/objview.asp?object_id=11503&language= SD23
[41] https://www.pembrokeshire.gov.uk/objview.asp?object_id=10378&language= SD26
[42] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12043&language= SD27

PCNPA), the SW Wales Regional Retail Study (PCC, PCNPA and Ceredigion CC) (SD31.1 to 31.6 [43]inclusive) and the background paper on Cross Boundary Settlements – consistency of approach with neighbouring authorities, 2021 – a PCC document, but referencing the need for a consistent approach with neighbour LPAs (SD41[44]).

Mention should also be made of the Carmarthenshire and Pembrokeshire Stage 1 SFCA from 2019 (prepared jointly by PCC, Carmarthenshire CC, PCNPA and BBNPA – SD43.1 to SD.43.23 [45]inclusive) and the SW Wales Stage 1 SFCA from 2022 (involving all the SW Wales LPAs and NPAs – SD43.24-SD43.25[46]). Additionally, there is a PCC / PCNPA Statement of Common Ground (SoCG) from 2018 (SD60[47]) and a Minerals SoCG, also from 2018, in the latter case prepared by PCC, PCNPA, Ceredigion CC and Carmarthenshire CC (SD61[48]).

Work was carried out on a Statement of Sub-Regional Collaboration for minerals for the West Wales sub-region, but this was not completed, although some of the emerging content has been transposed into PCC's LDP 2 (particularly in relation to sand and gravel).

There has been much collaboration with neighbour authorities on other matters as well - including minerals and waste planning (where there were regular sub-regional meetings which it is intended to reinstate) and on site-specific matters, such as the emerging policy position on Cawdor Barracks and the former Brawdy Airfield.

For minerals, the South Wales Regional Aggregates Working Party meets regularly to discuss aggregates provision, and there is an all-Wales POSW minerals and waste group which meets twice yearly.

It is also important to mention the very significant interaction that has taken place with all neighbour authorities (and some more distant ones as well) through the jointly managed Cleddau, Teifi and Tywi Nutrient Management Boards. This has been a very significant collaboration in recent years.

The Celtic Freeport proposals are now starting to emerge, involving locations in Pembrokeshire and in Neath-Port Talbot Council areas and requiring joint working between affected LPAs.

Mention should also be made of the collaborative working, through the CJC, to take forward regional working on the SW Wales Strategic Development Plan. This is at an early stage, but a Delivery Agreement has recently been completed, and work has commenced on preparation of the regional evidence base to support this.

Other matters that have involved inter-authority collaboration relate to coastal planning. Coastal engineering and planning groups that oversee the Shoreline Management Plans (there is one group for the West of Wales coastline, another for the Swansea and

[43] https://www.pembrokeshire.gov.uk/local-development-plan-review/submission#:~:text=(SD31.1)%C2%A0SW,Summary%20%2D%20February%202017 SD31.1-31.6
[44] https://www.pembrokeshire.gov.uk/objview.asp?object_id=10123&language= SD41
[45] https://www.pembrokeshire.gov.uk/local-development-plan-review/submission#:~:text=(SD43.1)%C2%A0Carmarthenshire,10%20Allocation%20sites SD43.1-43.23
[46] https://www.pembrokeshire.gov.uk/local-development-plan-review/submission#:~:text=(SD43.24)%C2%A0South,Flood%20Risk%20Review SD43.24-43.25
[47] https://www.pembrokeshire.gov.uk/objview.asp?object_id=5488&language= SD60
[48] https://www.pembrokeshire.gov.uk/objview.asp?object_id=6416&language= SD61

Carmarthen Bay coastline, with elements of each extending into Pembrokeshire). Although focused on management and engineering, there are some land use planning elements to consider as well.	
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?	LC
Closed **LPA Response:** 8. Reference is drawn to the Council's response to question 4 of the Preliminary Questions Statement (SD13.1[49]), which provides an overview of updates and implications for LDP2. To note, the following policy updates require limited changes to LDP2: ▪ Dark Skies good practice guidance: It is proposed to update Criterion 10 and supporting paragraph 5.16 of Policy GN.1 (General Development Policy) to reflect the published guidance to better support the implementation of national planning policy for lighting in Section 6.8 of Planning Policy Wales (Ed. 12) and Policy 9 (Resilient Ecological Networks and Green Infrastructure) of Future Wales: the national plan 2040. An amendment is also proposed to Appendix 3: Supplementary Planning Guidance. ▪ Flooding: Technical Advice Note 15: Development, flooding and coastal erosion. Some updates to the explanatory text to Policy GN 1 General Development are required to reflect the Flood Zone categories set out in the updated TAN15, but these minor changes are descriptive only and will not change the meaning or application of the Policy. ▪ Housing: Local Housing Market Assessment 2023 (March 2025) formally made public July 2025. Minor updates to the Local Development Plan are needed to reflect this new publication. It is recommended that these are published as Matters Arising Changes as set out in Appendix A Part 1 Policy Edits. [c] Minor changes to LDP2 are also proposed in response to a letter from the Chief Planner, Planning Directorate, Welsh Government, Dated April 2, 2026. These relate to Changes to Permitted Development Rights (PDRs), introduced through changes to the Town and Country Planning (General Permitted Development) (Amendment) (Wales) Order 2026. The relevant changes are summarised below: ▪ Temporary Campsites A new permitted development class (Class BA) allows recreational camping for up to 60 days per calendar year, except within National Parks, Areas of Outstanding Natural Beauty and World Heritage Sites where a 28-day limit applies. ▪ Air Source Heat Pumps From 1 June 2026 permitted development rights will remove the 3 metre boundary rule, increase permissible unit size, allow up to two units for detached dwellings, and support air-to-air heat pumps, subject to compliance with Microgeneration Certification Scheme standards. ▪ Revised Section 7 List of Species and Habitats The letter refers to an updated Section 7 list of species and habitats. A minor re-	

[49] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12084&language= SD13.1

wording of LDP2 will ensure the updated list is referenced. The changes proposed are set out in Appendix A as Matters Arising Changes. Part 2 Minor Edits [c]	
Growth and spatial strategy	
9. Is the vision positive and sufficiently aspirational? Is it unique to local circumstances?	LC
Closed **LPA Response:** The Plan's vision seeks to align LDP2 with the Pembrokeshire Wellbeing Plan, the Well-being of Future Generations (Wales) Act 2015, the Welsh Government's National Sustainable Placemaking Outcomes, and the thematic priorities set out within Future Wales and Planning Policy Wales (PPW). As a result, the proposed LDP2 vision is centred on the use of Placemaking to deliver economic and spatial outcomes in a coordinated and complementary way. The vision presents a positive, ambitious and place-based future for Pembrokeshire, with several strong themes: ▪ Strong and resilient communities – communities are empowered, resourceful and able to respond successfully to rural and climate-related challenges. ▪ A strong sense of place – Pembrokeshire's distinctive natural landscape, cultural identity, built heritage and Welsh language are valued and protected. ▪ Sustainable economic growth – the vision supports a diverse and resilient economy, with opportunities across tourism, rural diversification, start-ups, green and blue energy, and emerging sectors. ▪ More opportunities for people – people of all ages are able to live, work and thrive locally, supported by a strong supply of homes and employment opportunities. ▪ Thriving towns and centres – the Haven Towns are positioned as important regional growth centres, while town centres become vibrant, multifunctional places. ▪ Strategic connectivity and investment – the Milford Haven Waterway and links to Ireland are recognised as important opportunities for future economic development, supported by appropriate infrastructure. ▪ Environmental enhancement – green infrastructure and biodiversity are actively enhanced across the County. ▪ Health and wellbeing – the vision promotes accessible, healthy environments that benefit both people and wildlife. ▪ Climate resilience and sustainability – climate change is treated as a challenge that can be successfully addressed, with economic and environmental priorities working together. ▪ A balanced approach to growth – development is envisaged alongside protection and enhancement of Pembrokeshire's environmental, cultural and community assets. Overall, the vision is particularly positive in that it combines economic prosperity, community resilience, housing, environmental improvement, cultural identity and wellbeing rather than treating these as separate priorities.	
10. How do the vision and objectives relate to the National Sustainable Placemaking Outcomes and local authority well-being objectives?	LC (MD)

Closed

LPA Response:

10. The LDP2 vision and objectives have a strong relationship with both the National Sustainable Placemaking Outcomes (NSPOs) in Planning Policy Wales [50] and the Council's local well-being objectives

    In terms of the NSPOs, PPW states that development plans should take forward the national sustainable placemaking outcomes and develop their own overarching outcomes at the appropriate local scale. The table below is based around the NSPOs set out in Figure 5 of PPW (Column one) and sets out which Plan Objectives relate back to the NSPOs (Column two):

Creating and Sustaining Communities	
Placemaking Outcome	Plan Objectives
Enables the Welsh language to thrive	F) Protect and promote the Welsh language
Appropriate development densities	B) Deliver high quality development where place-making is supported by sustainable design which responds appropriately to cultural and built heritage, landscape and townscape.
Homes and jobs to meet society's needs	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.
A mix of uses	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. G) Support a range of uses in Town Centres to assist regeneration. I) Improve access to goods and services by facilitating improvements in infrastructure and community facilities and directing development to sustainable locations.
Offers cultural experiences	B) Deliver high quality development where place-making is supported by sustainable design which responds appropriately to cultural and built heritage, landscape and townscape. F) Protect and promote the Welsh language. J) Protect and enhance the County's environment, biodiversity and habitats.
Community-based facilities and services	D) Sustain resourceful communities by providing a range and mix of homes supported by key community facilities and services. 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 and community facilities and directing development to sustainable locations.
Making the Best Use of Resources	
Outcome	Plan Response
Makes best use of natural resources	B) Deliver high quality development where place-making is supported by sustainable design which responds appropriately to cultural and built heritage, landscape and townscape. E) Build on the County's strategic location for green/blue energy, maritime and port related development. H) Promote accessible and healthy environments for both people and wildlife through the protection and delivery of green infrastructure. J) Protect and enhance the County's environment, biodiversity and habitats. K) Prevent waste arising and ensure resources are used responsibly.
Prevents waste	K) Prevent waste arising and ensure resources are used responsibly.
Prioritises the use of previously developed land and existing buildings	B) Deliver high quality development where place-making is supported by sustainable design which responds appropriately to cultural and built heritage, landscape and townscape. G) Support a range of uses in Town Centres to assist regeneration.
Unlocks potential and regenerates	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. E) Build on the County's strategic location for green/blue energy, maritime and port related development. G) Support a range of uses in Town Centres to assist regeneration. I) Improve access to goods and services by facilitating improvements in infrastructure and community facilities and directing development to sustainable locations.
High quality and built to last	B) Deliver high quality development where place-making is supported by sustainable design which responds appropriately to cultural and built heritage, landscape and townscape.

[50] Planning Policy Wales Edition 12, Para 2.15 Planning Policy Wales - Edition 12

Maximising Environmental Protection and Limiting Environmental Impact	
Outcome	Plan Response
Resilient biodiversity and ecosystems	A) Mitigate and respond to the challenge of Climate Change. H) Promote accessible and healthy environments for both people and wildlife through the protection and delivery of green infrastructure. J) Protect and enhance the County's environment, biodiversity and habitats.
Distinctive and special landscapes	B) Deliver high quality development where place-making is supported by sustainable design which responds appropriately to cultural and built heritage, landscape and townscape. 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. J) Protect and enhance the County's environment, biodiversity and habitats.
Integrated green infrastructure	H) Promote accessible and healthy environments for both people and wildlife through the protection and delivery of green infrastructure.
Appropriate soundscapes	B) Deliver high quality development where place-making is supported by sustainable design which responds appropriately to cultural and built heritage, landscape and townscape. J) Protect and enhance the County's environment, biodiversity and habitats.
Reduces environmental risks	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. J) Protect and enhance the County's environment, biodiversity and habitats.
Manages water resources naturally	B) Deliver high quality development where place-making is supported by sustainable design which responds appropriately to cultural and built heritage, landscape and townscape. J) Protect and enhance the County's environment, biodiversity and habitats.
Clean air	B) Deliver high quality development where place-making is supported by sustainable design which responds appropriately to cultural and built heritage, landscape and townscape. J) Protect and enhance the County's environment, biodiversity and habitats.
Reduces overall pollution	B) Deliver high quality development where place-making is supported by sustainable design which responds appropriately to cultural and built heritage, landscape and townscape. J) Protect and enhance the County's environment, biodiversity and habitats. K) Prevent waste arising and ensure resources are used responsibly.
Resilient to climate change	A) Mitigate and respond to the challenge of Climate Change.
Distinctive and special historic environments	B) Deliver high quality development where place-making is supported by sustainable design which responds appropriately to cultural and built heritage, landscape and townscape.
Facilitating Accessible and Healthy Environments	
Outcome	Plan Response
Accessible and high-quality green space	H) Promote accessible and healthy environments for both people and wildlife through the protection and delivery of green infrastructure. J) Protect and enhance the County's environment, biodiversity and habitats.
Accessible by means of active travel and public transport	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 infrastructure17 and community facilities and directing development to sustainable locations.
Not car-dependent	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 infrastructure17 and community facilities and directing development to sustainable locations.
Minimises the need to travel	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. I) Improve access to goods and services by facilitating improvements in infrastructure and community facilities and directing development to sustainable locations.
Provides equality of access	D) Sustain resourceful communities by providing a range and mix of homes supported by key community facilities and services. I) Improve access to goods and services by facilitating improvements in infrastructure and community facilities and directing development to sustainable locations.
Feels safe and inclusive	B) Deliver high quality development where place-making is supported by sustainable design which responds appropriately to cultural and built heritage, landscape and townscape. D) Sustain resourceful communities by providing a range and mix of homes supported by key community facilities and services. I) Improve access to goods and services by facilitating improvements in infrastructure and community facilities and directing development to sustainable locations.
Supports a diverse population	B) Deliver high quality development where place-making is supported by sustainable design which responds appropriately to cultural and built heritage, landscape and townscape. D) Sustain resourceful communities by providing a range and mix of homes supported by key community facilities and services. F) Protect and promote the Welsh language. I) Improve access to goods and services by facilitating improvements in infrastructure and community facilities and directing development to sustainable locations.

Good connections	E) Build on the County's strategic location for green/blue energy, maritime and port related development. I) Improve access to goods and services by facilitating improvements in infrastructure and community facilities and directing development to sustainable locations.
Convenient access to goods and services	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. I) Improve access to goods and services by facilitating improvements in infrastructure and community facilities and directing development to sustainable locations.
Promotes physical and mental health and well-being	B) Deliver high quality development where place-making is supported by sustainable design which responds appropriately to cultural and built heritage, landscape and townscape. D) Sustain resourceful communities by providing a range and mix of homes supported by key community facilities and services. 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 infrastructure17 and community facilities and directing development to sustainable locations. J) Protect and enhance the County's environment, biodiversity and habitats.
Growing Our Economy in a Sustainable Manner	
Outcome	Plan Response
Fosters economic activity	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. E) Build on the County's strategic location for green/blue energy, maritime and port related development. G) Support a range of uses in Town Centres to assist regeneration. I) Improve access to goods and services by facilitating improvements in infrastructure and community facilities and directing development to sustainable locations.
Enables easy communication	I) Improve access to goods and services by facilitating improvements in infrastructure and community facilities and directing development to sustainable locations.
Generates its own renewable energy	E) Build on the County's strategic location for green/blue energy, maritime and port related development.
Vibrant and dynamic	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 and community facilities and directing development to sustainable locations.
Adaptive to change	A) Mitigate and respond to the challenge of Climate Change.
Embraces smart and innovative technology	E) Build on the County's strategic location for green/blue energy, maritime and port related development. I) Improve access to goods and services by facilitating improvements in infrastructure and community facilities and directing development to sustainable locations. K) Prevent waste arising and ensure resources are used responsibly.

With regard to the Pembrokeshire Wellbeing Plan reference is made to the Council's response to question 5.B of the Preliminary Questions Statement (SD13.1) [51] Inspector's Preliminary Questions which summarises how LDP2's key issues and drivers, vision and objectives are influenced by the Pembrokeshire Wellbeing Plan prepared in 2018. It is acknowledged that the referencing from the Wellbeing Plan has been updated in its latest version 2023. (paragraph 1.20 of the Local Development Plan 2). The LDP 2 Vision reflects key elements of the Pembrokeshire Well-Being Plan (2018, and as revised in 2023). Furthermore, as part of the Initial Questions, the Council was asked for a brief paper explaining how the LDP is consistent with current version of the Well-being Plan. The answer to this is set out in ED08,[52] which gives a comprehensive explanation of how the local authority well-

[51] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12084&language= SD13.1
[52] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12279&language= ED08

being objectives (updated in 2023) are embedded in the LDP2 vision and objectives. Reference is made to how LDP 2 paragraph 2.2 acknowledges the updated Well-being Plan and how it retains compatibility with the Vision and Objectives: "*The Draft Vision has been developed following discussions with County Councillors and Key Stakeholders and through the ongoing SA/SEA process. 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*."

a. Should the Plan objectives refer to Pembrokeshire Coast National Park Authority?

Closed

LPA Response:

10.a LDP2 will provide a revised and updated policy framework to guide development outside of the National Park and inform planning decisions taken by the County Council. As has already been noted in our answer to question 7 above, Pembrokeshire Coast National Park Authority are working on their replacement LDP at a differing timescale. Opportunities for collaborative working have been sought and these are summarised in the answer to question 7.

LDP2 takes account of the importance of the National Park because Section 62 (2) of the Environment Act 1995[53], states: *In exercising or performing any functions in relation to, or so as to affect, land in a National Park, any relevant authority shall have regard to the purposes specified in subsection (1) of section five of this Act and, if it appears that there is a conflict between those purposes, shall attach greater weight to the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area comprised in the National Park.*

The table below sets out the instances where the National Park has been taken account of in LDP2 objectives and policies:

Policies

GN 1 General Development Policy	Development will be permitted where the following criteria are met:..... 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;
Para 5.4	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.
GN 7 Cawdor Barracks including the former Brawdy Airfield	Once military use of the site ceases, 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): ..... 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..... 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

[53] Environment Act 1995 https://www.legislation.gov.uk/ukpga/1995/25/section/62

	requirements associated with the HRDF.
Para 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.
SP 11 Countryside	Joint SPG with Pembrokeshire Coast National Park Authority on Seascape Character

Objectives

J) Protect and enhance the County's environment, biodiversity and habitats.

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. Objective J serves to both protect and enhance the landscape of the (Pembrokeshire) County. Whilst LDP2 provides a framework for development in Pembrokeshire (excluding the National Park) for the plan period, Objective J purposefully uses the word 'County' to encompass the whole of Pembrokeshire County, including the National Park area. Although separate plan areas, the need to protect the National Park in Pembrokeshire is inherent in LDP2 Objectives and policies and this is considered to provide adequate protection.

11. Given the remaining time, is the Plan period 2017-2033 appropriate? LW (MD)

Closed

LPA Response:

The Development Plans Manual (Edition 3) SD 66 [54] indicates that Local Development Plans should normally operate over a 15-year plan period.

Key references include:

- The Manual gives the example of a plan period of "2020–2035", a 15-year period, when describing the required content of an LDP. See Page 16 Table 1.
- The housing allocation and trajectory guidance is structured around Year 1–5, Year 6–10 and Year 11–15, with references to delivery over the whole plan period and to the end of the plan period at year 15. See Page 117 Table 17
- The Sustainability Appraisal guidance also refers to the plan timescale being, for example, "15 years". See page 70 Table 6 Scoping Stage

In addition, the Manual requires the plan to state: the plan period and the expiry date of the period for which it is to have effect (Table 1, page 16).

Regulation 11[55] states that the plan must include the date of the expiry of the period for which the plan has been prepared. Section 62(9) of the PCPA 2004 (as inserted by section 12 PWA 2015) provides that an LDP ceases to be a LDP on the expiry of the period specified.

Although the Manual does not present a separate policy statement saying, "an LDP must cover exactly 15 years", the guidance is clearly framed around a 15-year plan period, and Welsh LPAs preparing replacement LDPs generally use a 15-year horizon. Pembrokeshire's plan period is 2017 (April) to (December) 2033.

[54] https://www.gov.wales/development-plans-manual-edition-3-march-2020 SD66
[55] The Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 (as amended 2015)

This is also consistent with current Welsh practice where replacement LDPs are expected to provide a long-term framework for growth and infrastructure delivery over approximately 15 years.

The Development Plans Manual (Edition 3) however also recognises that the base date and evidence base may need to be updated as the plan progresses through preparation and examination, and it contains several specific references to this.

The clearest reference to updating the base date during plan preparation is at paragraph 5.62, dealing with housing supply components: *"All components must have the same base date, which may require updating as the plan moves through the preparation process."*

This is an explicit acknowledgement that the base date is not necessarily fixed from the outset and may need to be rolled forward as the plan advances.

Regarding updating housing and delivery information before adoption the Manual also states that the housing trajectory and Anticipated Annual Build Rate (AABR) should be amended during plan preparation to reflect actual completions and revised assumptions: *"This process of amending the AABR can be undertaken throughout the plan preparation process."* See page 126. And *"It will be critical to undertake a final, amended AABR prior to adoption of the LDP."* See page 126. This means the evidence is expected to be refreshed as more up-to-date information becomes available.

There is recognition that the plan is prepared against a changing baseline. The Manual notes that actual completions may differ from those originally assumed and that delivery assumptions may change over the remaining plan period: *"Actual completions from the start of the plan period may not have matched those initially considered appropriate"* and assumptions about future delivery may change through the preparation process.

This provides the rationale for updating the base date and housing trajectory.

At Examination stage the Manual does not contain a general requirement that the entire plan period or base date must be reset at examination. However, it does envisage evidence being updated through to adoption. It notes that: *"It is only following the examination of the plan when there is certainty on the delivery trajectory..."* and requires a final amended AABR before adoption. See Page 122.

In Welsh LDP Examinations it is quite common for:

- housing completion figures,
- land bank commitments,
- trajectory data,
- population estimates, and
- other monitoring information

to be updated to a more recent base date during examination hearings or through hearing statements, provided the underlying strategy remains sound.

However, the Manual does not say that a replacement LDP should automatically extend its end date to maintain a full 15-year period if Examination is delayed. Rather, it allows

the evidence base and housing trajectory to be updated as the plan progresses. The Council has sought to provide evidence which is compliant with the LDP Manual 3 requirement: *"All components must have the same base date, which may require updating as the plan moves through the preparation process."* The issue for Pembrokeshire County Council's Local Development is the significant number of delays that have occurred with the Plan's progression to adoption. However, the Council has sought to provide updates on the Plan's components where this was considered necessary without changing the Plan's time frame and base date.	
12. Does the Plan's spatial strategy represent an appropriate approach for delivering, managing and distributing growth over the Plan period? BS 12a. Does the spatial strategy clearly communicate where future development will be located? BS	See across
Closed **LPA Response:** 12 and 12 a: Yes, the Plan sets out both what scale of future growth is required during the Plan period and how it will be distributed across the Plan area. Central to this is the Plan's settlement hierarchy, as set out in policy SP 6 of LDP 2 (Settlement Hierarchy – A Sustainable Settlement Strategy). This is in part derived from Future Wales – The National Plan 2040 (ED67[56]) and in part from PCC's own work to develop the Settlement Hierarchy for the other settlements, based on provision of services and facilities and embedded in ensuring an evidenced, sustainable approach to apportionment of future growth.	
12b. Does the evidence support a 60/40 urban/rural strategy over a 70/30 split? Has the Council maximised site opportunities in urban areas? BS	
Closed **LPA Response:** 12 b. Yes, the evidence does support a 60% urban / 40% rural spatial distribution of housing. This is broadly in line with the current population split in Pembrokeshire. It is the preferred option for LDP 2 as it offers growth opportunities to both urban and rural communities while still favouring the most sustainable locations for future growth, which are found in the towns. Based on past evidence, a 60% urban / 40% rural spatial distribution of housing is more likely to be deliverable than one based on a 70% urban / 30% rural split. Paragraph 3.14 of LDP 2 elaborates on this. The evidence that underpins this is presented in the Housing Land Supply and Trajectory July 2024 Background Paper (SD46[57]). Table 9 from this paper sets out the Estimated Spatial Distribution of Large and Small Windfall Sites, while Table 11 presents a Summary of (the) Spatial Distribution of Housing, looking at completions, dwellings under construction, dwellings with planning permission (not yet built), allocations, provision on large windfall sites and provision on small windfall sites. This paper was prepared to reflect the position in 2024 i.e. for LDP 2, Deposit Plan 2. The housing trajectory has been updated since then, including some changes to	

[56] https://www.gov.wales/sites/default/files/publications/2021-02/future-wales-the-national-plan-2040.pdf ED67

[57] https://www.pembrokeshire.gov.uk/objview.asp?object_id=11583&language= SD46

residential allocations proposed by the Council through Focussed Changes. Nonetheless, the Council is of the view that none of the subsequent updates have fundamentally altered the position regarding the 60% urban / 40% rural spatial distribution of housing. The second element of this sub-question asks whether the Council has maximised site opportunities in urban areas. The Council considers that it has made provision for future housing in the urban areas in accordance with the identified housing requirement for the Plan area through to 2033 and to reflect the Plan's spatial strategy, taking account of the 60% urban / 40% rural spatial distribution of housing that has been proposed. There is substantial provision for new housing in the urban settlements, but to be clear, not all Candidate Sites in these settlements were accepted and not all Alternative Sites put forward in these settlements during the LDP 2, Deposit Plan 2 consultation were accepted either. The Council is not proposing further changes to LDP 2 in the urban settlements.	
12c. 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? SH	
Closed **LPA Response:** 12 c. Please see document SD13.1[58] - responses to questions 7 (Spatial strategy), 8 (Settlement Hierarchy) and 9 (Distribution of Development – Placemaking) and Queston 12 (Provision of Housing). The Council has also responded to a specific question on previously developed land in Initial Questions Letter PCC response (ED08)[59]. See under Tasks 3.5.6.7.8 starting on page 28.	
12d. Will the spatial strategy support Regional Growth Areas and the wider region? BS	
Closed **LPA Response:** 12d. Yes, the spatial strategy will support Regional Growth Areas and the wider region. The Regional Growth Areas are defined by Future Wales – The National Plan 2040 (SD67[60]). The Regional Growth Area in South West Wales comprises Carmarthen and the Pembrokeshire Haven Towns (defined as Haverfordwest, Milford Haven, Pembroke and Pembroke Dock). These are locations that are identified by Future Wales as being suitable for sustainable strategic growth and regeneration. Policy 29 of Future Wales is specific to this Regional Growth Area The Future Wales (FW) policy anticipates that these settlements will be a focus for managed growth, reflecting their important sub-regional functions and strong links to the National Growth Area of Swansea Bay and Llanelli. The Council considers that the provisions of LDP 2 are consistent with Future Wales policy 29, having regard to the various residential and employment allocations of the emerging plan, the existing housing commitments and the safeguarding of strategic	

[58] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12084&language= SD 13.1
[59] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12279&language= ED08
[60] https://www.gov.wales/sites/default/files/publications/2021-02/future-wales-the-national-plan-2040.pdf SD67

employment sites. Reference is also made in FW policy 29 to tourism, public transport and key services, and in this regard the provisions of the Council's LDP 2 will help to ensure that the Haven Towns continue to support appropriate provision of new development to support that aspiration. It is worth noting that the new public transport interchange, including a new bus station, has just opened in Haverfordwest. Looking at the wider region, 'Swansea Bay and Llanelli' is identified as a National Growth Area (NGA) by Future Wales. No part of Pembrokeshire is within the NGA, but the port and energy developments taking place in the County will contribute to the achievement of economic growth aspirations beyond the County, including those in the Swansea Bay and Llanelli NGA. Transport and energy transmission infrastructure will facilitate those functional linkages. PCC contributed to the Swansea Bay and Llanelli National Growth Area (NGA) Definition Project Research Report prepared by Turley consultancy (November 2022). It is worth mentioning that the Celtic Freeport initiative involves locations in Pembrokeshire and in Neath-Port Talbot Council areas. PCC's LDP 2 policies and proposals will provide a planning foundation for Celtic Freeport proposals in Pembrokeshire. Mention should also be made of the economic infrastructure in place that links Pembrokeshire to other parts of the UK and to the Irish Republic.	
12 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? TN	
LPA Response: Closed 12 e. Yes. Best and Most Versatile (BMV) agricultural land has been considered throughout the Plan process. Please see SD50.1 and SD50.2[61] Agricultural land classification 2024 Background Paper and SD05.5 Part 4[62] – other edits OE10 which provides further detail on BMV consideration in the plan preparation and the evidence used. LDP 2 Deposit Plan with Focussed Changes accords with national policy see GN 1 General Development Policy criterion 4 with SD05.2 Part 1 - Focussed Changes[63] FC5.GN01.06	
13. What is the purpose of the strategic policies? Are they useful and useable in development management terms? 13a. Is Policy SP 1 justified? Does it duplicate provisions in other policies?	BS
Closed **LPA Response:** 13. and 13a The strategic policies of LDP 2 provide the high-level policy context for the Plan, for instance by defining the development needs of the Plan area to 2033 (the Plan's requirements) and how that growth will be distributed across the Plan area (the apportionment aspect). In so doing, they draw upon the key issues, vision and objectives and Plan strategy set out earlier in LDP 2. The strategic policies provide an overview of matters that are, in many cases, developed further through the general policies of the Plan (the GN policies). As such, they provide a policy foundation for much of what follows.	

[61] Part 1 https://www.pembrokeshire.gov.uk/objview.asp?object_id=11618&language=SD50.2
https://www.pembrokeshire.gov.uk/objview.asp?object_id=11617&language= SD50.1
[62] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12023&language= SD05.5
[63] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12021&language= SD05.2

The strategic policies are also helpful in setting out some key policy messages in terms of matters such as sustainability, placemaking and the well-being of future generations, again developed in more detail through general (GN) policies later in the document. The setting out of a strategic policy context is important as it helps to explain how other policies and proposals across a range of scales, contribute to the vision and objectives of the Plan. Without this, there would be less clarity. Policy SP 1 (Creating Sustainable Places) explains that all proposals must ensure that development supports the delivery of economic, social, environmental and cultural well-being and sustainable development. These are principles that underpin Plan content. The detail of the policy asks for development proposals to demonstrate various requirements, with links provided to other Plan policies that explain those requirements in more detail. Setting out the requirements in this way, through policy SP 1, demonstrates the breadth of considerations required to fulfil a range of fundamental planning expectations embedded in LDP 2.	
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?	SH (BS)
Closed **LPA Response:** 14. Please see document SD13.1[64] Preliminary Questions - Question 8. 14a. In addition to the response set out under Q8 in the Preliminary Questions document above – the methodology used to identify the settlement hierarchy seeks to ensure a consistent approach to defining settlements of a similar character, based on the scoring system set out in the Urban Settlements Report (Sept 2019 with minor updates July 2024) (SD40[65]) and Rural Facilities Report (Dec 2020 with corrections July 2024 (SD39[66]). Over time, it is inevitable that services and facilities on which the methodologies are predicated will change, and in some instances the change may be sufficient to alter the category in which a settlement has been placed. Where changes have been brought to the attention of the Council through the Deposit Plan consultation process, changes have been proposed – see Focussed Changes FC4.SP06, FC.SP07 (SD05.2[67]). The proposed changes relate to two settlements – Llanteg and Llanteglos and result in a minor amendment to the Plan. 14b. Plese see the response to Questions 6 and 7 in the Inspector's Preliminary Questions Paper (Doc ref SD13.1[53]) and Section 4 of the Preferred Strategy (Doc ref SD09.9[68]). 14c. A table has been included as part of the supporting text to Policy SP6 (Spatial Strategy)	

[64] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12084&language= SD13.1
[65] https://www.pembrokeshire.gov.uk/objview.asp?object_id=7175&language= SD40
[66] https://www.pembrokeshire.gov.uk/objview.asp?object_id=9968&language= SD39
[67] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12021&language= SD05.2
[68] https://www.pembrokeshire.gov.uk/objview.asp?object_id=5589&language= SD09.9

of the Plan (see after paragraph 4.31) setting out the most common types of development that may be considered in each of the settlement types. Policies SP8 (Regional Growth Areas and Urban Settlements; SP9 (Service Centres and Service Villages); SP10 (Local Villages); and SP11 (Countryside) provide details of the types of development considered appropriate for each level of the settlement hierarchy. The Plan does not specifically identify the overall amount of development appropriate for each tier. There are non-residential allocations outside Settlement Boundaries. The response to question 15a below explains the reason for this, with specific reference to employment allocations.

The table below provides the totals of non-housing land allocated (allocations for Strategic Employment Provision (Policy SP 14); Renewable Energy (Policy GN 5); Employment (Policy GN 9); Mixed Use (Policy GN 10); Specialist and Supported Accommodation (Policy GN 23); Gypsy and Traveller Sites (Policy GN 24); Community Facilities (Policy GN 30) for each tier of the Settlement Hierarchy.

Where land is allocated outside of a settlement boundary for policy reasons but clearly forms part of a settlement it has been counted as a total for the settlement. Other sites which are further away from settlement boundaries are recorded as being located in the countryside.

Settlement Tier	Non-Housing Allocation Area (Ha)	Percentage of Non-Housing Allocation Area (%)
SP 8 Regional Growth Areas	136.6	58
SP 8 Other Uban Settlements	5.46	2
SP 9 Service Centres	9.94	4
SP 9 Service Villages	2.67	1
Local Villages	0	0
Countryside	79.88	34
Total	**433.63**	**100**

The table shows the proportion of allocated land located at the settlements and in the countryside.

Question 26 of the Preliminary Inspector's Questions (SD13.1[69]) provides further detail on the process of allocating land for strategic employment and employment uses which is 80.2% of the land allocated in the countryside. These employment sites are either brownfield land with previous industrial/employment uses (Blackbridge, Trecwn) or are extensions to established sites with employment use (Celtic Link Business Park, Princes Gate, South of KP Thomas and Sons).

Two of the four Gypsy and Traveller Accommodation allocations (at Withybush and Kingsmoor) are extensions to established gypsy and traveller sites (1.8% of the land allocated in the countryside). Further detail about these allocations can be found in Question 24 of the Preliminary Inspector's Questions (SD13.1[70]).

The remaining allocations in the countryside are for specialist and supported

[69] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12084&language= SD13.1
[70] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12084&language= SD13.1

accommodation (4.3% of land allocated in the countryside). These are two sites (South West of Park House and East of Park House) and are in close proximity to one another and to an established care facility which occupies a former hotel with the allocations in the grounds of the care facility.

14d. The table referred to in response to question 14c, above, also shows the categories of settlements where windfall development will be considered.

In the emerging Pembrokeshire Local Development Plan 2 (2017-2033), windfall housing is intended to be managed through the settlement hierarchy, with progressively tighter control as you move down the hierarchy. Settlement boundaries are a key mechanism because they identify where windfall development is acceptable in principle.

The higher tiers are expected to accommodate the majority of windfall development; Service Villages a more modest level; and Local Villages only limited small-scale windfall opportunities, with countryside development tightly controlled

For non-housing development, the Pembrokeshire LDP does not generally rely on a formal "windfall allowance" in the way it does for housing. Instead, unallocated proposals are managed through the settlement hierarchy, settlement boundaries and criteria-based policies.

Employment Development: The Plan allocates strategic and local employment sites, but it also recognises that additional employment proposals may arise on sites that are not specifically allocated. Within higher-order settlements, employment development can come forward on unallocated sites where it accords with the spatial strategy and relevant employment policies. Existing employment areas within settlements are often included within settlement boundaries, reflecting an expectation that redevelopment and intensification opportunities may arise over the plan period. The Plan also allows for development in the countryside where such proposals require a countryside location.

Retail Development: Retail development is primarily directed to defined town and local centres, but opportunities can arise on unallocated sites within settlements. The Plan identifies Primary and Secondary Retail Frontages and Town Centres on the proposals map, allowing retail proposals to be assessed through policy criteria.

Community Facilities: Community facilities are largely dealt with through criteria-based policies. The Plan specifically allocates some community facilities but also allows new facilities, extensions and improvements to existing facilities where they support community needs. Existing community facilities are generally incorporated within settlement boundaries.

Supported Accommodation and Specialist Uses: The Plan includes specific allocations for some supported accommodation schemes, but also provides for such development being considered through a policy-led assessment rather than only through allocations.

Tourism and Visitor Accommodation: Tourism development, visitor accommodation and leisure uses are expected to arise through unallocated sites. Such proposals are assessed against locational and environmental criteria, with the settlement hierarchy influencing whether a proposal is in a sustainable location.

Renewable Energy and Infrastructure: Many infrastructure projects, renewable energy schemes, transport improvements and utility developments are inherently difficult to allocate in full at plan-making stage. These are therefore principally managed through criteria-based policies and safeguarding mechanisms rather than a formal windfall approach. The Proposals Map identifies safeguarded infrastructure corridors and other strategic designations. Role of the Settlement Hierarchy: The Settlement Boundary Methodology explains that settlement boundaries are intended to identify where development is acceptable in principle and that different approaches apply at different tiers of the hierarchy. This applies not just to housing but also to employment land, community facilities, mixed-use schemes and other development. Larger settlements are expected to accommodate a broader range of unallocated development opportunities than lower-tier villages. In summary, the Plan's approach is best described as policy-managed windfall development for non-housing uses, rather than a quantified windfall supply similar to housing.	
15. Have the settlement boundaries been drawn appropriately to account for the planned growth? SH a. Why have certain employment areas (such as at Withybush) not been included within a settlement boundary? BS b. How have the Council dealt with suitable sites that fall below the allocation threshold? SH	See Across
Closed **LPA Response:** 15. Settlement Boundaries define areas within which development opportunities may be appropriate. In Urban Settlements, Service Centres and Service Villages they include areas allocated for development. Settlement Boundaries are also included for Local Villages, allowing for small-scale infill and rounding-off development. Collectively, these Settlement Boundaries allow for the level of growth identified in the Plan. 15a. Certain employment sites are excluded from Settlement Boundaries. The reasons for doing this are set out in the Settlement Boundary Methodology 2019 Background Paper (SD55[71]). Paragraph 4.5 says that built areas of the settlements can be excluded if they are considered vulnerable to pressure for development or redevelopment for other uses which would not benefit local communities ... an example of this would be employment uses where the loss of employment land ... would impact on sustainability and employment opportunity. Paragraph 4.9 of SD55[60] says that for different levels of the Settlement Hierarchy, the following approach is taken (the information below is paraphrased): A. Settlement Boundaries for all levels of the Settlement Hierarchy down to Service Village – existing or newly allocated employment land which is surrounded by the built environment of the settlement is included within a Settlement Boundary. Sites which are on the edge of the settlement are excluded from the Settlement Boundary. B. Settlement Boundaries for Local Villages – large existing employment sites .... are excluded from Local Village Settlement Boundaries as in many cases their redevelopment for residential purposes would adversely affect the character of the settlement and be disproportionate in scale to the settlement.	

[71] https://www.pembrokeshire.gov.uk/objview.asp?object_id=7614&language= SD55

15 b. The threshold for housing allocations is 5 dwellings. Where candidate sites were considered to be suitable for development, but where the appropriate number of units was less than 5, the site is included within the settlement boundary as white land. Sites were included in the Candidate Sites Register (SD08.1 to 6[72]) and categorised as 'Green 3' sites. Proposals coming forward for development on such land are considered, as usual, through the planning application process. Sites may be developed for non-residential purposes.	
16. Do Policies SP 8, SP 9 and SP 10 provide an appropriate framework for managing development?	SH (BS for SP8)
Closed **LPA Response:** 16. This response takes into account the changes proposed to policies SP8 and SP9 in response to questions 17 and 18d below. Yes. Policies SP 8, SP 9 and SP 10 set out the types of development required for each tier of settlements at a strategic level to support their place within the hierarchy, to fulfil the objectives of the Plan and in the case of SP 8 to ensure a complementary planning policy approach to that set out in policy 29 of Future Wales – The National Plan 2040 (SD67[73]).	
17. Does Policy SP 8 provide a spatial dimension for development within the urban settlements?	SH
Closed **LPA Response:** 17. This strategic policy sets the framework for the largest settlements in the Plan area. A description of the spatial dimension is set out in the supporting text to the policy (paragraphs 4.33 to 4.43) which highlights the valuable strategic role of these Settlements. On reflection, it is considered that the final sentence of the Policy is unhelpful as it relates to exceptional instances where development may be permitted in the countryside which should be covered by Policy SP 11 Countryside. It is therefore suggested that this sentence be deleted from the policy. Please see Appendix A Part 1 Policy Edits Matters Arising Changes [9] for the proposed edit.	
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?	SH(MD)
Closed **LPA Response:**	

[72] https://www.pembrokeshire.gov.uk/local-development-plan-review/submission#:~:text=(SD08.1)%C2%A0Candidate,settlements%20R%2DW SD08.1-08.6
[73] https://www.gov.wales/sites/default/files/publications/2021-02/future-wales-the-national-plan-2040.pdf SD67

18a. The term 'scale and nature identified as being appropriate for the settlement' relates to each of the Settlement Tiers and therefore is described more fully in the supporting text of Policy SP6 (Settlement Hierarchy). Sentence 3 of paragraph 4.30 sets out that development is to be proportional to the size of a settlement, its function and character and based on current service provision. 18b. Please see the response to question 18d below. 18c. The policy's reasoned justification at paragraph 4.45 describes the approach referring to allocations proposed. The more detailed policies of the Local Development Plan flesh out these matters for housing primarily GN 15 Housing Mix etc, GN 16 Residential Allocations, GN 17 Residential Commitments GN 20 Local Needs Affordable Housing and GN 21 Exception Sites for Local Needs Affordable Housing. There is further detail provided under the headings 'Service Centres' and 'Service Villages' in the reasoned justification. 18d. On reflection, it is considered that the final sentence of the Policy is unhelpful as it relates to exceptional instances where development may be permitted in the countryside which should be covered by Policy SP 11 Countryside. It is therefore suggested that this sentence be deleted from the policy. Please see Appendix A Part 1 Policy Edits Matters Arising Changes [c] for the proposed edit.	
Closed 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?	SH(BS)
LPA Response: 19a. The purpose of cluster villages is set out in the Cluster Settlements Paper (Dec 2020) (SD42[74]). 19b. Sentence 4 of paragraph 4.53 (supporting text of Policy SP 10) explains that Cluster Villages are identified as Local Villages. Cluster Villages are specifically listed within Policies SP6 (Settlement Hierarchy) and SP10 (Local Villages) (see also Focussed Change FC4.SP06). Paragraph 4.53 details the scale of residential development considered appropriate in Local Villages. Paragraph 4.54 of the Plan clarifies the scale of residential development that would be considered appropriate within Cluster Villages.	
Closed 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?	SH
LPA Response: 20. As written, Policy SP11 sets out only some of the types of development that may be permitted in countryside locations by national planning policy. The situation would be better clarified by referring more broadly to the uses that are either allocated outside of Settlement Boundaries or where there are policies within the Plan permitting their development adjacent or well-related to settlement boundaries and more generally within the Countryside. It is therefore suggested that the main policy text is set out to encompass these uses. See Appendix A. Part 1 Policy Edits Matters Arising Changes [c] Paragraph 4.64 requires an update to include nitrogen as an issue for some areas. See	

[74] https://www.pembrokeshire.gov.uk/objview.asp?object_id=9956&language= SD42

Appendix A Part 1 Policy Edits.[c]	
Closed 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?	SH
LPA Response: Closed 21a. b. c Please see the response to question 10 of the Preliminary Questions Document (SD13.1[75])	
Closed 22. How have rolled forward allocations been considered, given advice in the Development Plans Manual (Table 18)?	LW (BS)
LPA Response: In Table 18: The Components of Housing Supply of the Development Plans Manual (Edition 3) SD66 [76], the Manual distinguishes between different sources of housing supply, including allocations carried forward (rolled over) from a previous LDP. The key point is that rolled-over allocations are not automatically counted as deliverable supply simply because they were allocated in a previous plan. They must be reassessed as part of the replacement LDP process. The Manual emphasises that allocations should be supported by evidence of deliverability and included within the appropriate housing supply components. Error! Reference source not found.'– presents the evidence for substantial change in circumstances. For each allocation of the Plan, it sets out whether it: ▪ Has been rolled forward from the previous plan ▪ Was submitted as a LDP 2 candidate site ▪ Has a recent planning application history ▪ Has been subject to a recent change of ownership ▪ Has seen a major development constraint recently removed or mitigated ▪ Relates to a site being prepared for development ▪ Has been subject to emerging Freeport proposals ▪ Has been subject to any other matters pertaining to the Inspectors' question The Appendix gives an indication of the circumstances that have persuaded the Council to continue to allocate (sometimes in modified form) various previously allocated sites.	
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,	TN (SH)

[75] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12084&language= SD13.1
[76] https://www.gov.wales/development-plans-manual-edition-3-march-2020 SD66

including its contents? f. With reference to the Council's site delivery tables ([77]ED 12a to ED12j), 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?	
Closed **LPA Response:** 23a The policy is consistent with national planning policy apart from the use of a 5+ dwelling threshold rather than a 10 dwelling threshold. National Policy does allow for LPAs to identify their own thresholds as long as these can be justified. The locally defined threshold of 5 or more dwellings is considered necessary to be consistent with the Plan's housing allocation threshold. The Plan's housing allocations have been assessed. Appendix 1 of Welsh Language Update 2024 Background Paper (SD58[78]) and the Sustainability Appraisal (SD02.1[79]) assess allocated sites within Welsh Language sensitive areas for their impacts. As laid out in SP19, mitigation, including phasing and bilingual signage will aid the sensitive management of development. The site delivery tables ([80]ED12a to ED12j) also indicate appropriate mitigation for allocated sites in the Welsh language sensitive areas. The wording of the policy could be clarified to reflect how it will be applied. To improve the clarity of SP19 Welsh Language it is proposed to add the words 'windfall sites' to the second sentence of the policy. The Welsh language impact assessment thresholds should be numbered '1' and '2' with the reference to 'windfall' deleted from 1. Please see Appendix A Part 1 Policy Edits of the Hearing statement for the Matters Arising Change [c] proposed. In terms of the evidence base, the policy is based on the Proposal Map - see the Foccused change FC4.SP19.01 (SD05.2[81]) and (SD05.4[82]) Part 3 - Maps Booklet). "Welsh Language sensitive areas" are based on the 2021 Census data. 23b The Plan's implications for the Welsh language have been assessed in the Welsh Language Update 2024 Background Paper (SD58[83]) and in the Sustainability Appraisal (SD02.1[84]) 23b. As advised in 23a above the Council has assessed the Plan's allocations and identified mitigation in Welsh language Sensitive Areas. In terms of windfall proposals LDP 2 does not anticipate a significant quantity of large-scale windfall housing sites in the Plan area overall. For Large Windfall housing sites (5+ dwellings) the trajectory anticipates: ▪ in 8 Main Towns - 193 dwellings as large (5+) windfall (3 of the Main Towns are in the Welsh Language Sensitive area); ▪ in 9 Service Centres - 20 dwellings as large windfall (4 Service Centres are in the Welsh Language Sensitive area); ▪ in 44 Service Villages - 61 dwellings as large windfall (17 Service Villages are in	

[77] https://www.pembrokeshire.gov.uk/local-development-plan-review/examination-2025#:~:text=(ED12a)%20Renewable,Empt%20Sites%20SP14 ED12a-ED12j
[78] https://www.pembrokeshire.gov.uk/objview.asp?object_id=11616&language= SD58
[79] https://www.pembrokeshire.gov.uk/objview.asp?object_id=11608&language= SD02.1
[80] https://www.pembrokeshire.gov.uk/local-development-plan-review/examination-2025#:~:text=(ED12a)%20Renewable,Empt%20Sites%20SP14 ED12a-ED12j
[81] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12021&language= SD05.2
[82] https://www.pembrokeshire.gov.uk/objview.asp?object_id=11998&language= SD05.4
[83] https://www.pembrokeshire.gov.uk/objview.asp?object_id=11616&language= SD58
[84] https://www.pembrokeshire.gov.uk/objview.asp?object_id=11608&language= SD02.1

the Welsh Language Sensitive area). These trajectory figures highlight that there are a limited number of large (5+ dwellings) windfall sites in the plan so, as a consequence, a limited number which will require a Welsh Language Impact Assessment. Windfall employment and commercial development at scale tend to be less frequent in these locations but the policy prescriptions will apply when they arise. 23c Appendix 1 of Welsh Language Update 2024 Background Paper (SD58[69]) and the Sustainability Appraisal (SD02.1[70]) assess allocated sites within Welsh Language sensitive areas for their impacts. As laid out in SP19, mitigation, including phasing and bilingual signage, will aid the sensitive management of development. The site delivery tables (ED12a-ED12j[85]) also indicate appropriate mitigation for allocated sites in the Welsh language sensitive areas. 23d SP19 sets out how development will be managed in sensitive areas, including what mitigation measures may be required in the reasoned justification. The site delivery tables (ED12[86]) also indicate appropriate mitigation for allocated sites in the Welsh language sensitive areas. 23e The Policy with the clarifications above will advise when a Welsh Language Impact Assessment will be required. The reasoned justification sets out what the likely contents of a Welsh Language Impact Assessment could contain- paragraph 4.132. 23f Allocations in Welsh language sensitive areas have been assessed for their impacts in Appendix 1 of the Welsh Language Update 2024 Background Paper (SD58[87]) and in the Sustainability Appraisal (SD02.1[88]). This can be read alongside the Site delivery files (ED12a-ED12j[73]) which indicate where Welsh Language mitigation will be required. Reference to where a further impact assessment may potentially be required needs to be deleted when the Site Files are taken forward as draft Supplementary Planning Guidance as this issue has already been addressed. Please note that the phasing tranches for the release of sites may also need to also be updated in some instances because of the need to update the LDP Trajectory in response to an Inspector question outside the Matters Issues and Questions agenda. The phasing approach (i.e. the number of housing units programmed per year as set in the Welsh Language Background Paper which is used as a ceiling remains unchanged in the updated Trajectory.) 23g With the changes set out above, the policy will be more clearly expressed.	

[85] https://www.pembrokeshire.gov.uk/local-development-plan-review/examination-2025#:~:text=(ED12a)%20Renewable,Empt%20Sites%20SP14 ED12a-ED12j

[86] Settlements B- K https://www.pembrokeshire.gov.uk/objview.asp?object_id=12292&language= ED12e
Settlements L-M https://www.pembrokeshire.gov.uk/objview.asp?object_id=12293&language= ED12f
Settlement N-W https://www.pembrokeshire.gov.uk/objview.asp?object_id=12294&language= ED12g
Employment Allocations https://www.pembrokeshire.gov.uk/objview.asp?object_id=12289&language= ED12b
Gypsy Traveler Allocations https://www.pembrokeshire.gov.uk/objview.asp?object_id=12290&language= ED12c
Strategic Employment Sites https://www.pembrokeshire.gov.uk/objview.asp?object_id=12297&language=
Mixed Use https://www.pembrokeshire.gov.uk/objview.asp?object_id=12295&language= ED12j

[87] https://www.pembrokeshire.gov.uk/objview.asp?object_id=11616&language= SD58

[88] https://www.pembrokeshire.gov.uk/objview.asp?object_id=11608&language= SD02.1