Pembrokeshire Local Development Plan 2
Representations to the Inspector at Examination Stage

Representor 2233 – S & F Walder and neighbours

These notes outline the key points that the residents of *Southlands, St Daniels Hill, Pembroke* wish the Inspector to consider at the Examination Stage. They specifically refer to the allocation of two sites immediately south of the Southlands estate, HSG/095/LDP2/2 (Site 2/2) to the South West and HSG/095/LDP2/5 (Site 2/5) to the South East.
It is our view that the inclusion of these two sites is unsound on a significant number of grounds ranging across County wide housing requirement through to the specific characteristics of the sites and their relationship to the existing developments in Pembroke.

Examination Session 2

Housing Requirement in LPA area
At best the LPA's housing requirement target is optimistic and more likely overstated and undeliverable.

The LDP is based on an annual requirement of 365 dwellings, and the LPA has provided a wide range of statistics and reasons to justify this figure. It is to be noted that under-delivery over the first six years of the plan (2017 to April 2023) has already adjusted the housing requirement to 382 dwellings per annum over the remaining 10 years of the plan (April 2023 to end of 2033)

The updated Pembrokeshire Demographic Evidence report produced for the LPA by Edge Analytics in March 2026 again clearly demonstrates the wide range of possible housing requirements of the period to 2033.

The LPA's response to our objections appears to agree with several of our contentions but places particular hope on the impact of the Celtic Freeport on employment opportunities with a target of 1000 related new jobs over and above the Plan's initial expectation of 1,970 new jobs and consequential housing need. Phase 1 of the Freeport plan concentrates on infrastructure development with supply chain development and hence employment starting post 2029. The reality of major inward migration in the final 4 years of the plan is difficult to foresee.

We maintain the view that allocation of Sites 2/2 and 2/5 is not justified by any realistic housing requirement and the Plan is unsound in that regard.

Residential Allocation to Pembroke v. Pembroke Dock
Together with senior County Councillors and Pembroke Town Council we contend that there is a disproportionate allocation of housing development to Pembroke compared with Pembroke Dock.

The extent of services availability and potential employment opportunities indicates that a sound LDP would proactively seek housing allocations in Pembroke Dock without expanding the settlement boundary of Pembroke into good quality agricultural land.

The LPA's additional employment expectation from Celtic Freeport would all be centred around Pembroke Dock, further reinforcing our view that this is where more housing is required if at all.

In our representation we pointed out as an example (New Site 19), an area within the Pembroke Dock settlement boundaries that could create a more equitable distribution between the two communities. We accept entirely that it had not been proposed as a Candidate Site but we were using its possible use as an example of the passive approach to the development of the LDP by the LPA. The disproportionate allocation to Pembroke is likely to compromise the deliverability of development allocations to the town and the Plan is not sound in that regard.