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23rd October 2026

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PEMBROKSHIRE COUNTY COUNCIL LOCAL DEVELOPMENT PLAN 2 EXAMINATION

RESPONSE TO MATTERS AND ISSUES – MATTER 2 (HEARING SESSION 2)
HOUSING NEED, SUPPLY AND AFFORDABLE HOUSING ISSUE

Please find enclosed, on behalf of, and under instruction from the landowner and promoting party, L. Greggain and Co Ltd, a submission to the Examination of the Pembrokeshire County Council Local Development Plan 2 (LDP2) in relation to sites Land at Myrtle Meadows, Steynton (ref. HSG/086/LDP2/1) and Land North of Hayston View, Johnston (ref. HSG/048/00038) – which are allocated as residential sites within LDP2 policy GN 16 (Residential Allocations).

This submission comments on the matters and issues raised by, and set out in, the Inspectors' Schedule of Matters, Issues and Questions to cover Matter 2 (Hearing Session 2): Housing need, supply and affordable housing: *"Issue: Whether the Plan's housing strategy is justified having regard to the identified levels of need, is supported by robust and credible evidence and is consistent with national planning policy?"*

We look forward to attending the Hearing Session in respect of the matter above in due course. In the meantime, we hope and trust that all is in order with the submission. Please do not hesitate to contact us in the event that further information is considered beneficial.

Yours sincerely,

Geraint John
Director
Geraint John Planning Ltd.

PREFACE

This submission comments on the matters and issues raised by, and set out in, the Inspectors' Schedule of Matters, Issues and Questions to cover Matter 2: Housing need, supply and affordable housing: *"Issue: Whether the Plan's housing strategy is justified having regard to the identified levels of need, is supported by robust and credible evidence and is consistent with national planning policy?"*

Each of the relevant issues raised in relation to the above matters are considered in relation to each site in turn and in detail below.

This Submission

It should be noted that these submissions do not respond to every question raised within the Inspector's Schedule of Matters, Issues and Questions, as not all of these questions necessitate a response by us, and/or earlier submissions made on behalf of the promoting party (Representor ID. 4475) are considered sufficient to address the matters raised. Accordingly, these representations only provide responses to questions where it is considered necessary and relevant to do so.

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

QUESTIONS

Housing (need and supply)

2. *Is the housing land supply figure in Policy SP 2 appropriate and justified?*

...

c. *Is the housing trajectory realistic, based on delivery rates that are credible and robust?*

It is noted that the Housing Trajectory in Appendix 2, which comprises a Table of the Timing and Phasing of Allocations (2018 – 2033), has been updated following the representations made to the Deposit Plan – to bring the yield of the site forward within the Plan period. Whilst the changes suggested at the Deposit Plan by ourselves have not been accommodated precisely (which set out that the Site is able to start yielding in the year '2026-27'), it is acknowledged and appreciated that the site is stated as being able to commence development in the year '2028-29'. As a result of the passage of time between the comments made at the Deposit Plan stage (December 2024) and the Examination stage, this has essentially brought forward the site / yield – which we consider achievable and robust.

It is noted that the trajectory accepts that the site can, and will, deliver the full housing allocation within the Plan period – which we endorse.

Settlement Tier	LDP 2 Reference	Site Name	Settlement	Total Units to be delivered in Plan period	Time period for pre-application discussions / PAC consultation	Time period for submission of planning application and determination	Time period for the discharge of relevant conditions to enable site construction	Number of units complete	Number of units UC	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33	2033	Units beyond the plan period
Urban	HSG/086/LDP2/1	Land at Myrtle Meadows, Steynton	Milford Haven	65	2027	2028	2028	N/A	N/A	0	0	5	20	20	20	0	0	

Housing Trajectory

To evidence and support the above position – early and full yield in the Plan period, the site is readily available and suitable to accommodate the development in the short-term, given there are no extensive start-up works or costs that would delay the commencement of development on site. It is = considered that it is a realistic possibility that the site begins to yield ahead of the year '2028-29'. The evidence submitted in support of the site to-date demonstrates this to be both possible and achievable. It should also be stressed that the initial yield of the Site is likely (and realistically)

to be much greater than the 5no. in the first year. This is a minor change that ought to be considered and made accordingly.

3. Will the Plan deliver the housing requirement?

a. Is the rate of delivery contained in the housing trajectory realistic, based on robust and credible evidence and consistent with the requirements of the Manual?

In response to Question 2a, the rate of delivery contained in the housing trajectory is discussed in detail. In short, it is considered that the housing trajectory is robust, and represents an achievable trajectory in line with the site's potential to yield in short (immediate) term, and full within the Plan period.

b. Are the site allocations available and deliverable within the anticipated timescales? Are the allocations supported by a robust and comprehensive site assessment methodology, free from significant development constraints and demonstrated to be economically viable?

As set out above, and within the representations submitted to date, the site is both available and deliverable within a timescale indicated within the housing trajectory. The extensive evidence presented and submitted to-date as part of the promotion of the site and allocation evidences and confirms as much. Greater detail on this is set out in the submission to Matter 8 (Site Allocations) when specifically considering the site / allocations.

It is for this reason, and the reasons set in previous representations, that the trajectory for the site is considered to be realise realistic and robust.

Affordable housing

6. Is the Financial Viability Report (SD28, ED10a and ED10c) based on robust and credible evidence?

In respect to Financial Viability, and whether this is based on robust and credible evidence, we are aware that an Update / Addendum has been prepared (BHL February 2026). This is helpful in principle – as it recognises and reflects the ever changing and volatile market.

a. Are the component assumptions on costs, values, planning obligations and other associated requirements realistic and justified?

Insofar as costs, values and related matters directly affected by these (planning obligations etc) it is noted that the BHL Update / Addendum recognises and records that vales are considered to have experienced an uplift of 2.75% gross, whereas it is considered appropriate to apply an uplift of 5% to plot costs rates. In practice it is considered that these changes are more pronounced – with values having stagnated (as opposed to increased), and costs having increased much greater than the 5% uplift factored in. Our client – an active housebuilder with a long-standing presence in the County, and sites under construction, has of course first-hand evidence of this.

Notwithstanding any differences in the figures, the update / addendum recognises that this has led to an increased financial burden on some sites (the exercise having been undertaken on the Key Sites, albeit is transferable and equally applicable to all sites). The summary and conclusions section of the Update / Addendum recognises that this could have an impact on the proportion of affordable homes and / or contributions to community infrastructure that have previously been quantified.

It should accordingly be noted and factored in that this is the position and climate, and that all sites will need to be approached flexibly insofar as actual provision is concerned – not least as the update recognises that not all costs are known – including possible costs associated with resolving Nutrient Neutrality.

It should be stressed that these changes will not necessarily make the Site economically unviable, merely that the level of provision of planning obligations and affordable housing will need to be closely addressed at the site delivery stage.

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

QUESTIONS

Housing (need and supply)

2. *Is the housing land supply figure in Policy SP 2 appropriate and justified?*

...

c. *Is the housing trajectory realistic, based on delivery rates that are credible and robust?*

The Housing Trajectory (updated in September 2026) identifies the site as having the potential to provide for 113no. units (previously 93no. within the Deposit Plan), with only 50no. being identified within the trajectory to be delivered in the Plan period. An extract of the relevant tables is provided below:

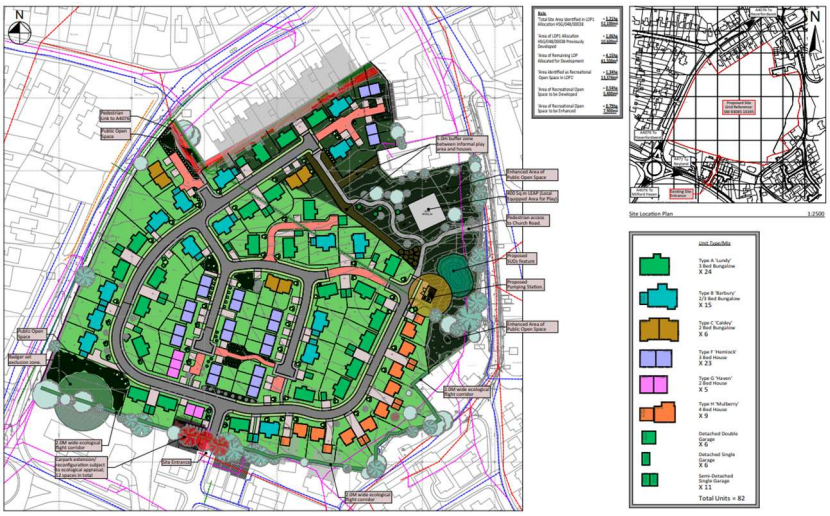
Settlement Tier	LDP 2 Reference	Site Name	Settlement	Total Units to be delivered in Plan period	Time period for pre-application discussions / PAC consultation	Time period for submission of planning application and determination	Time period for the discharge of relevant conditions to enable site construction	Number of units complete	Number of units UC	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33	2033	Units beyond the plan period
Service Centre	HSG/048/00038	North of Hayston View	Johnston	50	2027	2028	2029	N/A	N/A	0	0	0	10	20	20	0	0	63

Housing Trajectory

As set out within the representations made to the Deposit Plan, the trajectory sets out that the site is expected to deliver a minimum of 50no. units within the Plan period, with (a now updated figure) of 63no. to be delivered beyond the period. It is considered that the trajectory for the site remains incorrect, and not in line with the evidence presented and submitted to-date for the site. Specifically, it is the case that the proposed development of the site will be expected to yield in full within the Plan period. The reasoned justification for this is set out within the representations made to the Deposit Plan, however, given the passage of time between December 2024 and the date of these submissions, these points made have been both summarised and updated below for reference.

The above table identifies that the development will start to yield units in the year 2029-30, with final completion in the year 2031-32. The anticipated 'start date' is questioned – not least given that this has been 'pushed back' substantially from the start date indicated within the trajectory published with the Deposit Plan (which was set at '2026-27'). This is not considered to be a reasonable change, nor is one that aligns with the information submitted and reviewed throughout the promotion of the site. The site, which is readily available, is considered capable of yielding within the year '2027-28' – which is not only achievable, but more reasonable when considering the previous start date attributed to the site.

Moreover, the candidate site was originally submitted as part of the Call for Candidate Sites process in 2018 for 82no. units, and was supported by the proposed layout overleaf:



Site Plan

The indicative site plan suggests that the site could accommodate a total of 82no. units. The site plan has been supported by the submission of a Development Viability Model through the RLDP process which has confirmed that 82no. units are viable within the site, and therefore, deliverable.

Clearly there has been considerable evidence provided through the RLDP process that the site is wholly deliverable during the early stages of the revised LDP. The indicative site plan has been informed by the constraints and opportunities to development at the site, with significant work having been undertaken on the candidate site in order to inform the number of units proposed. Moreover, the site has considered the various non-residential elements that need to form part of the scheme, including 3no. areas of Public Open Space, Local Equipped Area of Play (LEAP), foul pumping station, SuDS green infrastructure and biodiversity benefits. With these elements considered and incorporated into the site layout, it has resulted in a robust and informed proposal accordingly, and is wholly acceptable in respect of national and local planning policy provisions. For this reason, as well as the impressive track record of the site promoter and developer, it is considered that the site is wholly and realistically deliverable, and should be allocated for 82no. units accordingly.

On this basis, the site's allocation – which has been increased further from the number attributed within the Deposit Plan, should be reduced to 82no. units. The site capacity work undertaken has determined that this is the level of provision that can be reasonably and appropriately be achieved within the site – which has robustly considered its opportunities and constraints, and which factors in, and is based on / informed by, considerable market knowledge and experience. It is considered that any higher provision would likely undermine the placemaking credentials of the site, the marketability of the development, and in turn, result in an undeliverable scheme, and an unrobust Housing Trajectory accordingly.

Accordingly, it is proposed that the following trajectory of the site is appropriate for a development of this scale in this location, and therefore, should be adopted for the site's allocation in LDP2:

2027-28	2028-29	2029-30	2030-31
10	25	25	22

Proposed Trajectory

It is considered that the above trajectory is achievable, and will bring about a net gain of 32no. units to be delivered in the Plan period, over and above the 50no. currently identified. As outlined previously, the site is entirely suitable and available for development, and accordingly, represents an acceptable site to yield much needed affordable housing and market housing within the short and medium-term in the Plan period.

Should it be the case that a more conservative approach is taken to the start on site – which would strongly suggest is not necessary or appropriate, the site is still considered to be appropriately placed to yield entirely within the Plan

period. It is therefore considered that the trajectory should be amended accordingly to the reflect the above, as it has been evidenced to-date that the site can come forward for development wholly within the Plan period.

3. Will the Plan deliver the housing requirement?

a. Is the rate of delivery contained in the housing trajectory realistic, based on robust and credible evidence and consistent with the requirements of the Manual?

The rate of delivery contained in the housing trajectory is discussed in detail above. In short, it is considered that the housing trajectory should be changed and updated to account for the details submitted and considered as part of earlier stages of LDP2. The changes suggested represent an achievable trajectory in line with the site's potential to yield in short term and should be made accordingly.

b. Are the site allocations available and deliverable within the anticipated timescales? Are the allocations supported by a robust and comprehensive site assessment methodology, free from significant development constraints and demonstrated to be economically viable?

As set out above, and within the representations submitted to date, the site is both available and deliverable within a timescale earlier than that indicated within the housing trajectory. The extensive evidence presented and submitted to-date as part of the promotion of the site and allocation evidences and confirms as much. Greater detail on this is set out in the submission to Matter 9 (Site Allocations) when specifically considering the site / allocations.

It is for this reason, and the reasons set in previous representations, that the trajectory for the site is considered to remain incorrect and not in line with the evidence presented and submitted to-date for the site, and ought to be amended accordingly.

Affordable housing

6. Is the Financial Viability Report (SD28, ED10a and ED10c) based on robust and credible evidence?

a. Are the component assumptions on costs, values, planning obligations and other associated requirements realistic and justified?

The site promoter's response to Questions 6 and 6a are set out above. This response should be read and considered as part of the representations to / for both sites accordingly.

Conclusion

In summary, it is considered that the Housing Trajectory set out for sites Land at Myrtle Meadows, Steynton (ref. HSG/086/LDP2/1) and Land North of Hayston View, Johnston (ref. HSG/048/00038) are substantially correct, albeit may need – for the above reasons.

The site promoter, L Greggain and Co Ltd, has a significant track record in delivering housing in the County, and is actively seeking to prepare and submit formal planning applications to Pembrokeshire County Council to secure permission for the sites to enable their development at the earliest opportunity. The responses set out above (including the amendments suggested) will support the approach employed by the landowner and site promoter.

We consider that the information contained within this Statement and the representations made previously provide sufficient evidence to support the approach set out above, and to make the necessary revisions set out.