LICHFIELDS

Written Statement

Date 23 October 2026
To Inspector Ian Stevens, PEDW
From Helen Ashby-Ridgway, Lichfields (ID 4409)
on behalf of Pembrokeshire Living Limited (ID 4410)

Subject Pembrokeshire County Council LDP2: Matter 4

Inspector's Questions:

1. *Is Policy GN 15 sufficiently clear? Are the policy and supporting text consistent with, and based on, up-to-date evidence?*

    a. *How would the 'local community' needs be determined within the first paragraph? Is this a reasonable basis upon which to assess needs?*

2. Is criterion B effective?

a. How would an applicant demonstrate an 'appropriate mix' of housing types, tenures and bedroom numbers?

3. Is criterion C effective?

a. How would an applicant be able to demonstrate an 'appropriate balance' of housing? How would this be applied by proposed use and/or location?

Response

1.1 Pembrokeshire Living has combined its response to the Inspector's first three questions in Matter 4 as its overarching concern regarding how the Council will define local/community needs relates to all three questions.

1.2 The draft policy identifies that new residential development should contribute to the creation of balanced communities and meet the market and affordable housing needs of the local community. In its representations, Pembrokeshire Living raised concerns with how the "*needs of the local community"* would be defined when an application is determined.

1.3 The Council did not report on Pembrokeshire Living's representations in relation to draft policy GN15 in the Consultation report schedule dated 17 July 2025, as updated 24 September 2025. The Council recorded the Company's response to the Focused Change consultation dated 9 October 2025. The original objection was referenced in Focused Change response, but no details of the Council's view were recorded.

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1.4 The Council did, however, include Pembrokeshire Living's response within the Issues Report Appendix 4 dated 17 July 2025, updated 23 September 2025 and made overarching responses to a number of the comments raised in respect of this emerging policy.

1.5 In respect of Matter 1, Pembrokeshire Living notes that the Council will be relying on a mixture of Local Housing Market Assessment (LHMA) derived requirements and '*more local information'* at the point of application (Page 58). The response, which continued onto page 59, references the 2021 LHMA assessment with the 2023 assessment awaited. At the point at which the document is dated, that 2023 assessment was published.

1.6 Notwithstanding the administrative points raised above, Pembrokeshire Living maintains its concerns regarding the appropriateness of defining local need through the 20 HMAs identified by the Council. These concerns have been covered in detail in the Company's response to Matter 1 and the same points are relevant for the emerging Policy GN.15. For brevity, the concerns raised in relation to this are not repeated for Matter 4 but have been duplicated at the end of this response for ease of reference.

1.7 Reference in Criterion B to meeting the needs of the Plan, rather than the local community is endorsed by Pembrokeshire Living. This approach to looking at mix of housing types on a Plan wide basis is a sensible approach. That said, the emerging policy – when read a whole - now introduces a degree of conflict as the policy refers to meeting local community needs while the criterion seeks to address on a Plan wide basis. This conflict needs to be resolved and the policy simplified for clarity.

Inspector's Questions:

5. Is criterion E effective?

a. What is the justification for requiring all units to meet 'identified space standards'?

b. Is the policy clear on which standards apply to specific housing types?

c. Is it necessary to duplicate Building Regulations provisions within this policy?

6. Is the policy wording sufficiently flexible to respond to changing circumstances?

Response

1.8 Pembrokeshire Living has still not been able to identify the space standards to which the Council would apply criterion E in this draft policy. If control over space standards is to be sought, these should be tested as part of the Examination. If the Council's intention is only to ensure that affordable housing DQR standards are met, this should be clarified in the policy wording.

1.9 If the Council's intention is to require space standards to be met for non-DQR developments, sufficient flexibility needs to be built into the emerging policy to not only

deal with changing circumstances but also to reflect the varying demands of different types of residential unit.

Copy of response in relation to 'local need' in Matter 1

1.1 Pembrokeshire Living Limited responds to these two questions together as the matters are closely interlinked. During the Deposit 2 and Focused Changes consultations, Pembrokeshire Living raised concerns regarding the approach to how the County Council sought to deliver policy objectives through emerging policies with regard to the matter of meeting 'housing need'.

1.2 Overall, in relation to emerging policy SP9, Pembrokeshire Living Limited is supportive of the emerging policy that provides strategic promotion of development at smaller centres and villages across the County. This must be welcomed as part of the wider settlement strategy.

1.3 Point 2 of the draft policy states that through development, sustainable communities, a thriving rural economy, place-making and well-being will be encouraged ensuring '*high quality accommodation of tenure(s) appropriate for the housing needs of the community'*. Point 3 of the draft policy similarly refers to *'local community'*. Pembrokeshire Living had raised concerns that reference to meeting housing needs of the community was undefined and is therefore not sound because it was not appropriate in the light of the evidence. The Company suggested that reference be instead made to the Housing Market Area.

1.4 In its response to the representation, the Council noted:

"The latest published Local Housing Market Assessment would be the primary driver in considering housing requirements but may need to be informed by more local information available at the point of application, for example where a high requirement for one-bedroom flats may not recognise longer-term needs for the growth of households. Local community-based housing surveys can also assist. The current Local Housing Market Assessment 2021 contained in the evidence base provides a breakdown of size of new accommodation required by Community Council area in terms of bedroom size and tenure in Appendix 1. The Council is seeking to finalise the 2023 Local Housing Market Assessment with Welsh Government and hence that updated document is not available to refer to here (February 2025). It should be noted though that there is a restriction on the number of Housing Market Areas that can be identified under the Welsh Government's newest methodology which reduces the Council's ability to identify need more locally as it has been able to do with earlier versions of the Local Housing Market Assessment. In day-to day development management decision making, the Council relies on its Supplementary Planning Guidance 2015 to define local areas for the delivery of affordable housing. Definition of Local Area Consideration of information on need to support a new development 3.8 When assessing whether or not there is evidence of local need to support a development proposal for a new affordable home or homes, the Council will consider the "local area" to be a community council and its adjoining community councils for rural areas. Adjoining community councils exclude those community councils separated physically by the river Cleddau. The Towns (Haverfordwest, Milford Haven, Neyland, Fishguard and Goodwick, Narberth, Pembroke and Pembroke Dock) will be considered separately as self-sufficient areas. It is important that affordable homes are developed in those areas where there is an existing identified need in the local community. Where an individual is proposing a LCHO property for their own occupation, demonstrating a connection with Pembrokeshire will be considered sufficient demonstration of local need. In conclusion, a flexibility of approach is needed so the site in question is considered usually within the context of information available for the community council area in which it is sited and neighbouring community council areas, but bearing in mind needs at a Pembrokeshire level for example for LCHOs or perhaps a strategic need for specialist housing is considered. The approach in Policy SP9 is considered appropriate as it allows for flexibility of interpretation when read alongside other policies of the Plan and supporting guidance which provide more advice on how need is considered." (Representations Reports Part 2 Updated 24 September 2025)

1.5 The Council has updated its Local Housing Market Assessment (LHMA) since the Deposit 2 consultation took place. The 2023 Assessment was published in March 2025. It is not clear why there has been such a delay in making available the LHMA from 2023. Reference within the National Policy background section still refers to PPW Edition 11 (February 2021) and not the current Edition 12 which was published in July 2024. A comparative review of the possible changes in this regard has not been made by Pembrokeshire Living.

1.6 It is understood that the LHMA will be based upon the Welsh Government's 2022 guidance. The most recent LHMA guidance from the Welsh Government was published in August 2026, with the earlier guidance withdrawn from the website. It has not been possible to review the 2023 Assessment against the 2022 guidance.

1.7 Pembrokeshire Living welcomes the Council's position that the emerging policy would allow for flexibility of interpretation while the use of up to date and other sources of information could be submitted as part of, and used to inform the determination of, individual planning applications. Pembrokeshire Living also welcomes the Council's particular reference to '*bearing in mind*' Pembrokeshire's strategic need for some types of accommodation. These should both be recorded within the Plan for clarity of application during the determination of an application.

1.8 Notwithstanding this support, there are a number of continuing concerns with the approach taken as reported in the Council's response:

1 The Council now suggests that the 'local area' is considered to be the community council area and its adjoining community councils for rural areas. It is not clear which settlements in policy SP9 are considered to be rural areas. The use of a Community Council area too small an area upon which to base need. Further, the question of which areas would include adjacent community council areas introduces uncertainty for those using the plan and preparing applications.

2 Notwithstanding reference to the local area, as set out above, the Council also states that the LHMA is considered to be the most primary driver in considering housing requirement. Whilst we understand that the HMAs within the LHMA are community council based, it is not clear which would be applied, this or the local area principle considered in (1) above.

3 The Council states that in deriving HMAs for the authority, the Welsh Government tool limits them to only 20 HMAs. This appears to be suggesting that the Council considers that the HMAs should be more numerous than the 20 used. The LHMA states,

"the Council has identified 20 HMAs based on the 2022 ward boundaries…based on trying to identify the main towns as separate HMAs and then grouping together other rural areas".

There is a significant flaw in this approach. In both the 2022 and 2026 guidance, the Welsh Government defines the HMA as:

"…areas have been defined geographically based on the functional areas where people currently live and would be willing to move home, recognising that housing markets are not constrained by administrative boundaries. A number of key factors have been taken into account when defining these areas, including the broad price of housing (to consider 'transferability' within the market) and major transport links by road or rail (to take account of commuting patterns). Individual preferences of households may well centre on smaller geographical radii. However, planning for additional housing provision needs to be conducted at a scale suitable to consider the costs and benefits of increasing supply (i.e. land availability, broad viability, dwelling vacancy rates and potential impact on housing need deficits)."

4 The LHMA does not provide any further information on how the HMAs were defined. Neither does the LHMA consider if this was the right approach in the context of the Welsh Government guidance. It is difficult to see how the areas were established given

the largely rural area of the County and its relatively strong road network, particularly in the south of the County. Pembrokeshire Living might expect there to be between 3 and 5 HMAs operating across Pembrokeshire County Council and the National Park.

5 For example, the settlements of Begelly and Kilgetty have been included within the Saundersfoot HMA. Higher tier settlements, which will have a greater range of jobs, services and facilities can be readily accessed:

a By car: Tenby (11-15 minutes), Pembroke (20 minutes), Pembroke Dock (21 minutes), Haverfordwest (22-27 minutes) and Milford Haven (33 minutes).

b By train: Tenby (10 minutes), Pembroke (30 minutes), Pembroke Dock (45 minutes). It is also possible to travel to Carmarthen in 30 minutes from Kilgetty directly, and Haverfordwest in around 50 minutes albeit it requires a change of trains in Carmarthen.

We would expect all of these settlements to form part of the functional area of Kilgetty and Begelly in some ways. Further, the Council's Settlement Hierarchy at emerging policy SP6 identifies Haverfordwest, Milford Haven, Pembroke Dock and Pembroke as the Regional Growth Areas identified in Future Wales. It is an important factor in considering how a HMA operates.

6 The LHMA considers the wider factors required by the Welsh Government for the LHMA but in a way that is ultimately dictated by the establishment of the HMA boundaries by the Council in the first instance, rather than by the factors that might be influencing the spatial extent of the HMA.

7 Data relating to commuting trends is provided every ten years in the census. Census 2021 data relating to the origin and destination of workers (recorded on 21 March 2021) was released in October 2023 and have been used in the LHMA 2023. These findings should, however, be treated with caution as the Census data relates to a particular point in time during the pandemic and national lockdown. As a result, a large proportion of the workforce were still furloughed, and others were required to work from home due to lockdown restrictions. The LHMA then looks at commuting figures compared to the 2011 Census data. The trends will have changed over the past 15 years. These have not been considered within the LHMA.

8 For areas such as the Saundersfoot HMA, it is not clear how the Council would disaggregate between the need under this policy within the National Park Authority and the Local Planning Authority.

9 The LHMA recognises that caravans (residential park homes) form part of the baseline residential stock in the County; in some of the Council defined HMAs this is up to 3.7% (drawing on 2021 census data). However, there is no reference later in the LHMA to the additional need that may arise over the 15 year plan period for residential park homes. Pembrokeshire Living would welcome confirmation that such accommodation types would be considered on a more strategic level rather than at the community council or defined HMA level.

1.9 At this time, whilst Pembrokeshire Living Limited continues to consider that the need described in emerging Policy SP9 should be based at a HMA level, the HMAs as defined by the Council are not appropriate for this purpose for the reasons set out above. We consider that the Council's approach needs to be reviewed in order to ensure that the Plan strategy and detailed policies can be made sound.