Pembrokeshire County Council

Local Development Plan (2017-2033)

Session 5

Wednesday 18th November 2026, 10:00am

Economy

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 5 – Economy **Wednesday 18th November, 10:00am**	
Issue: Whether the employment and economic strategies are supported by robust evidence and whether the Plan provides an appropriate and realistic policy framework in response to the issues and evidence?	
Economy	BS(LW)
1. How has the adjusted growth figure of 1,970 jobs over the plan period been identified in Policy SP 5? Is it based on up-to-date evidence and assumptions?	
Closed **LPA Response:** 1. The origin of the 1,970 jobs figure over the Plan period is set out in the Local Employment Trends Background Paper, December 2018 (SD47[1]). This sets out the conclusions from work carried out by Experian Goad consultancy to inform LDP2. It is an employment forecast covering the period 2017 to 2033, based on ONS data. It is an econometric model, based on historic data, but with some adjustments made to reflect recent and local knowledge. It is also based on what is described as a 'soft Brexit', at that time a prediction of what might happen. Also, to be clear, the jobs figure provided in 2018 was 2,200 over the period 2017 to 2033. For LDP2, Deposit Plan 2, the figure of 2,200 jobs was reduced to 1,970 to reflect the updated Welsh Government population and household projections for 2018 (published in August 2020) which had reduced the housing provision figures for LDP 2 from 425 dwellings per annum to 365 dwellings per annum. The link between housing and employment forecasts is explained in the Housing Requirement Background Paper, 2023 ([2]SD45) and in the Housing Land Supply and Trajectory July 2024 Background Paper ([3]SD46)– please see the last paragraph on page 36 and the first three paragraphs of page 37. The rationale for reducing the jobs figure to 1,970 is also set out in LDP2 paragraph 4.24. Clearly, the period from 2018 to 2026 has seen some significant events which will have had economic impacts, including Brexit, the Covid-19 pandemic and the establishment of the Celtic Freeport in Pembrokeshire and Neath-Port Talbot Council areas. Nonetheless, it is the Council's view that the forecasting provided at an earlier stage in the Plan process remains both robust and relevant, notwithstanding that the position regarding the Celtic Freeport is now clearer and is moving forward at pace.	
2. What assumptions have informed the economic forecast? Does this consider residents travelling to work from outside the County?	

[1] https://www.pembrokeshire.gov.uk/objview.asp?object_id=5626&language= SD47
[2] https://www.pembrokeshire.gov.uk/objview.asp?object_id=11582&language= SD45
[3] https://www.pembrokeshire.gov.uk/objview.asp?object_id=11583&language= SD46

Closed

LPA Response:

2. The jobs forecast provided by Experian Goad in 2018 (and subsequently amended) is referenced in the answer to question 1 (see the Local Employment Trends Background Paper, December 2018 - SD47[4]). The other major economic forecasting document that has informed the Council's LDP 2 is the Two County Economic Study (TCES). This covers both Pembrokeshire and Carmarthenshire. The documents are the TCES Final Report (SD19.1[5]), Appendix A – Literature Review (SD19.2[6]), Appendix B – Baseline Review (SD19.3[7]), Appendix C – Strategic Sites Review (SD19.4[8]), Interventions and Strategic Sites Summary Report (SD19.5[9]) and TCES for Carmarthenshire and Pembrokeshire 2020-21 Update (SD19.6[10]). The various TCES reports provide a substantial body of evidence which underpins the approach taken on employment land policies and provision by PCC's LDP2 and a common body of evidence on economic matters across Pembrokeshire and Carmarthenshire. The assumptions that informed the economic forecast can be found in the various TCES documents. The TCES documents look at anticipated job creation aspects as well but also focus on defining demand for employment land. The Summary of Demand is presented on pages 42 and the top of page 43.

   The Council has largely followed the approach suggested by the TCES in defining its Strategic Employment Sites, with 'the larger than local' Strategic Employment Sites list across Pembrokeshire and Carmarthenshire set out in the Study – see the final paragraph and the bulleted list that follows it on page 44 of the TCES Final Report (SD19.1[5]).

   In terms of LDP 2, some of these sites are included as allocations in policy SP 14 (Strategic Employment Provision) and others as safeguarded existing employment sites in policy SP 15 (Safeguarding of existing Strategic Employment Sites). The approach taken on this matter follows advice provided by Welsh Government officers earlier in the Plan process.

   Policy GN 9 (Employment Allocations) provides some further sites which are included to meet future demand for local employment sites – these are not strategic sites and are generally of a much smaller scale than the sites listed in SP 14 and SP 15.

   The purpose of the TCES 2020-21 Update (SD19.6[10]) was set out in Sections 6.1 and the main messages in 6.2.

   Updates to the suggested interventions were also included in the 2020-21 Update report – see Section 6.2.1

   The TCES also considered the five Travel to Work Areas covering

[4] https://www.pembrokeshire.gov.uk/objview.asp?object_id=5626&language= SD47
[5] https://www.pembrokeshire.gov.uk/objview.asp?object_id=7370&language= SD19.1
[6] https://www.pembrokeshire.gov.uk/objview.asp?object_id=7371&language= SD19.2
[7] https://www.pembrokeshire.gov.uk/objview.asp?object_id=7372&language= SD19.3
[8] https://www.pembrokeshire.gov.uk/objview.asp?object_id=7373&language= SD19.4
[9] https://www.pembrokeshire.gov.uk/objview.asp?object_id=7374&language= SD19.5
[10] https://www.carmarthenshire.gov.wales/media/1228826/two-county-economic-study-for-carmarthenshire-and-pembrokeshire-2020-21-update.pdf SD19.6

Pembrokeshire and Carmarthenshire, these being a) Cardigan, b) Haverfordwest and Milford Haven, c) Pembroke and Tenby, d) Swansea and e) Llanelli.	
3. What methodology has been used to translate the jobs target into employment floorspace and land requirements? Does this align with national policy and guidance?	
Closed **LPA Response:** 3. The creation of the jobs target was the product of one commission (see the Local Employment Trends Background Paper, December 2018 - SD47[11]) and the demand forecasting and its translation into land requirements for LDP2 was another (see the various documents comprising the Two County Economic Study (SD19.1 to SD19.6 inclusive[12]). The Practice Guidance on Building an Economic Development Evidence Base to Support a LDP (SD69) (Welsh Government, 2015)[13], chapter 6, offers two potential methodologies to follow, the first based on past completions, the second on labour demand forecasting. It is the second that converts a jobs-figure into a floorspace requirement. The Council's approach is more akin to method 1, albeit that as well as looking at past completions, it also incorporates a strong element of demand forecasting, which has some synergies with method 2. The Council believes that its approach to provision of employment land is consistent with the requirements of PPW, edition 12 (SD80[14]) and Welsh Government's TAN 23 on Economic Development (SD102[15]). It has broadly followed the Practice Guidance, but some aspects of its approach are a hybrid of the different methodologies.	
4. Does the underpinning economic development evidence follow national policy and guidance on Employment Land Reviews?	
Closed **LPA Response:** 4. As noted in the response to question 3 above, the Council considers that the underpinning of the economic development evidence is consistent with Welsh planning guidance, as set out in PPW edition 12 (SD80[14]) and TAN 23 on Economic Development (SD102[15]). It has broadly followed the related Practice Guidance (Welsh Government, 2015), but some parts of the approach are a hybrid of the different methodology choices presented in that document.	
5. Policy SP 13	

[11] https://www.pembrokeshire.gov.uk/objview.asp?object_id=5626&language= SD47
[12] https://www.pembrokeshire.gov.uk/local-development-plan-review/submission#:~:text=(SD19.1)%C2%A0Two,2020%2D21%20update SD19.1-SD19.6
[13] economic-development-evidence-base.pdf SD69
[14] https://www.gov.wales/planning-policy-wales SD80
[15] https://www.gov.wales/technical-advice-note-tan-23-economic-development SD102

a. What is the evidence basis for the component parts of Policy SP 13?	
Closed **LPA Response:** 5a. The justification for having a policy of this nature is provided by Future Wales – The National Plan, 2040 (SD67[16]). Policy 29 on Regional Growth Areas and Policy 32 on the Haven Waterway and Energy are directly relevant. Welsh Government identifies the Haven Waterway as a location for potential new renewable and low carbon energy-related developments, innovation and investment, including offshore floating wind turbine developments in the Celtic Sea and decarbonisation of some of the heavy industrial uses along the Haven Waterway, particularly through the introduction of hydrogen technology. For policy SP 13, the Council has also included Pembrokeshire's other major port location, at Fishguard Harbour, which is a ferry terminal providing freight and passenger connections to the Republic of Ireland (the Haven Waterway also has a similar role in this respect). Reference also needs to be made to the Haven Waterway Enterprise Zone, which was designated in 2012 and brings fiscal benefits to industrial users within defined spatial boundaries. The spatial area defined for SP 13 includes many of these sites but is mindful that some of the Enterprise Zone locations have environmental, landscape and flood risk constraints which may restrict or preclude development. More recently, the success of the Celtic Freeport bid (which has Pembrokeshire and Neath-Port Talbot elements to it) provides a further incentive for new port and energy related developments, over a long period running to 2050. There are spatial aspects of the designation, and while the Haven Waterway is a focus in Pembrokeshire, the geographic spread is much wider. Early-stage work has focused on identification of tax sites (and associated projects), which is ongoing, and will also soon be looking for potential customs sites. The jobs target for LDP 2 (see the Local Employment Trends December 2018 Background Paper, SD47[17]) pre-dated the Celtic Freeport and hence an adjustment has been suggested to take account of its potential impact on jobs created during the LDP2 Plan period. The Two County Economic Study also pre-dated the Celtic Freeport, although the potential for such a designation to be made was known. The major industrial sites along the Haven Waterway, at Haverfordwest and in the Fishguard and Goodwick area (including Trecwn) are referenced in the various TCES documents (SD19.1 to SD19.6 inclusive[18]) and the employment allocations for new sites and safeguarding of existing sites is a reflection of the conclusions presented in TCES. For information, the Council also undertakes periodic Employment Land Surveys, which provide an overview of provision of employment land across the whole County (including National Park locations), the latest being for 2022, which is published online[19].	

[16] https://www.gov.wales/sites/default/files/publications/2021-02/future-wales-the-national-plan-2040.pdf SD67

[17] https://www.pembrokeshire.gov.uk/objview.asp?object_id=5626&language= SD47

[18] https://www.pembrokeshire.gov.uk/local-development-plan-review/submission#:~:text=SD19.1)%C2%A0Two,2020%2D21%20update SD19.1-SD19.6

[19] Implementation and Monitoring - Pembrokeshire County Council (Scroll down to find the Employment Survey 2022 documents)

5b. What is the justification for excluding wind-related energy proposals and is this in general conformity with Future Wales Policy 32?	
Closed **LPA Response:** 5b. Several high-profile wind-related energy proposals have taken place in recent years in the spatial area covered by policy SP 13. For instance, the 3 x wind turbine development on land south of the Dragon LNG Terminal at Waterston (a DNS application – CAS-01859-K1M7Y6), recently constructed and now operational. However, just outside the SP 13 area, there was also a high-profile application for 5 x wind turbines on land south of the Valero refinery and east of Rhoscrowther, which was refused on 21/01/15, with two subsequent appeals dismissed (04/02/16 and 26/01/18) and a Court of Appeal decision, also to refuse, on 12/09/18 (references 13/0876/PA and APP/N6845/A/15/3025045). The Council is of the view that the principle of wind-related energy proposals will not invariably be supported in the area covered by policy SP 13 and hence, for this particular type of development proposal, there is a specific exclusion from the remit of the policy. Proximity to the Pembrokeshire Coast National Park and potential National Park impacts is a particular concern. To be clear, while other proposals that are supported in principle by SP 13 may also, on occasions, be turned down on matters of detail, the exclusion of wind-turbine proposals from the policy relates to the principle of the development. In terms of consistency with Future Wales – The National Plan 2024 (SD67[20]) Policy 32 recognises the Haven Waterway as a location for potential new renewable energy and low carbon energy-related development, innovation and investment. The Council notes that Future Wales defines several pre-assessed areas for wind energy, one of which (area 8) extends into the easternmost part of Pembrokeshire (although it is mostly in Carmarthenshire). There is a presumption in favour of large-scale wind energy development in the pre-assessed areas (policy 17 of Future Wales), subject to the criteria of policy 18 of Future Wales. No part of pre-assessed area 8 comes anywhere close to the area covered by the Council's LDP2 policy SP 13 area. Future Wales policy 18 provides a basis for consideration of wind energy developments outside the pre-assessed areas.	
5c. What is the purpose of paragraph 3 of the policy? Is it clear, focused and effective?	
Closed **LPA Response:** 5c. Paragraph 3 provides helpful contextual information on the emergence of the Celtic Freeport. Some of the tax sites and customs sites will be in Pembrokeshire and, as best we know at present, some of the Pembrokeshire sites (probably most, maybe all) will be within the area covered by LDP2 policy SP 13. In terms of content, what paragraph 3 says is correct, but on reflection the Council can see that there might be a case for moving the text from the	

[20] https://www.gov.wales/sites/default/files/publications/2021-02/future-wales-the-national-plan-2040.pdf SD67

policy into the reasoned justification and would appreciate any advice the Inspector can provide on that matter.	
5d. Is it sufficiently clear to which area the policy would apply on the Proposals Map? Is the extent of this area consistent with evidence?	
Closed **LPA Response:** 5d. The Council has defined the spatial area within which the policy would apply on the Proposals Map. The area was extended through a Focussed Change, in the vicinity of Pembroke Power Station to reflect emerging Celtic Freeport proposals see (FC4.SP13.02 in SD05.2 [21]Part 1 Focussed Changes and SD05.4[22] Part 3 Deposit Plan Focussed Changes Maps Booklet) and other recent planning permissions, such as 20/0041/PA (for a converter station). Essentially, the policy will apply in defined areas on the north and south shores of the Haven Waterway and on land adjoining Fishguard Harbour. As things currently stand, the Council is of the view that the area concerned is consistent with available evidence, although of course the Celtic Freeport proposals are not finalised and are evolving rapidly. A perfect spatial match between the Celtic Freeport sites and SP 13 may not ultimately be achieved. The Council also notes that it has included a policy caveat which requires demonstration that SP 13 proposals respect and protect the landscape, natural and built environment.	
6. Employment site allocations – Policies SP 14, GN 9 and GN 10 6a. Have the allocations followed a robust site assessment process, including a call for sites?	
Closed **LPA Response:** 6a. The allocations reflect the assessments and outcomes presented in the Two County Economic Study (SD19.1 to SD19.6 inclusive[23]) and took due account of the various sites Candidate Sites, some of which have been put forward as GN 9 allocations (local employment sites). On GN 10, site MXU/040/01 is a mixed-use commitment, while MXU/095/LDP2/01 is currently being implemented.	
6b. What is the basis for categorising sites into Policies SP 14 and GN 9?	
Closed **LPA Response:** 6b The policy SP 14 allocations are strategic sites that were identified as such through the Two County Economic Study (TCES) and as discussed in the answer to question 2 (see SD19.1 to SD19.6 inclusive[23]). As explained in SP 14, on some of the allocated sites, partial development may have already taken place, but a substantial amount of land within their boundaries still awaits development. It is also the case that on the safeguarded sites in SP 15, an element of land within the boundaries of these existing sites may not have been developed at	

[21] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12021&language= SD05.2
[22] https://www.pembrokeshire.gov.uk/objview.asp?object_id=11998&language= SD05.4
[23] https://www.pembrokeshire.gov.uk/local-development-plan-review/submission#:~:text=(SD19.1)%C2%A0Two,2020%2D21%20update SD19.1-SD19.6

all or will have been released for non-employment uses (see paragraph 4.92). Such is the nature of employment sites – they tend to be a lot more dynamic over time than housing sites and applying a simple committed / under-construction / completed model is often inappropriate, because of the continual 'churn' as parts of sites come into use / fall out of use / change use / change in size. The GN 9 sites are non-strategic B-class employment sites and very often more suitable to meet local demand for employment land. These are often smaller scale than their strategic counterparts and the safeguarding requirements (as set out in GN 11) are less strict. Generally, these will not have been identified as strategic by the TCES and some of them have come about through Candidate Site submissions.	
6c. Do both policies clearly differentiate between allocated and committed sites?	
Closed **LPA Response:** 6c. Please see the answer to question 6b above. Trying to apply a committed / under-construction / completed model to employment sites doesn't reflect the reality of what happens on such sites over time. Whilst that type of approach works well for residential developments, it is less satisfactory for employment developments. You might expect a newly completed house to remain in continuous use as a residence thereafter for 100 years and often a lot longer. That will not be the case for employment sites, as is demonstrated by the results from the Council's employment land surveys (please see the link to the Employment Land Survey 2022 in the response to question 5a above).	
6d. Do the allocation hectarages in policies SP 14, GN 9 and GN 10 take account of site constraints identified in the evidence?	
Closed 6d. The site areas are gross figures, so within any site, there will be areas that will be used for various types of site infrastructure, for landscaping, and that are otherwise difficult to develop. How much land within any given site is taken up in such a way will vary on a case-by-case basis, and may well also vary over time. The Council's employment land surveys recognise this aspect, and it is included as a separate category for each site considered by those surveys (again, please see the link to the Employment Land Survey 2022 in response to question 5a above).	
6e. Do the figures represent the totality of the available land or the expected uptake during the plan period?	
Closed **LPA Response:** 6e. Although much of the expected employment development in the Plan area will come forward on allocated employment sites, or on sites safeguarded for employment uses, employment proposals may also be proposed on windfall	

sites within the Plan period. Where this happens policy GN 8 Employment Proposals provides a basis for their assessment. Where an existing employment site is proposed for extension, policy GN 12 Extension to Employment Sites is also available.	
6f. Is there an estimate of jobs expected to be accommodated on each site and their contribution to the overall target?	
Closed **LPA Response:** 6f. No, that calculation has not been made. It would, in any case, be difficult to do this where the employment site proposals are still at an early stage (or not currently clear) and where the jobs provided would be likely to significantly vary between the construction phase of the project and the subsequent operational phase.	
6g. Does the supply provide an appropriate range of site types, sizes, and locations to meet needs?	
Closed **LPA Response:** 6g. The Council's view is that it does provide a range of site types, sizes and locations to meet needs. While the strategic sites are, not surprisingly, mostly focussed along the Haven Waterway, at Haverfordwest (particularly at Withybush) and adjoining or close to Fishguard Harbour, the inclusion of the policy GN 9 sites widens the geographical range of sites. Policy GN 8 is available to meet any proposals for employment uses that arise on windfall sites, while GN 12 is available where an extension to an existing employment site is proposed.	
6h. Does the distribution of employment sites have regard to the provisions of Future Wales?	
Closed **LPA Response:** 6h. The Council considers that the provision of employment sites, through allocations in LDP 2, together with its employment site safeguarding policies and criteria-based policies relating to employment proposals, have had due regard for the provisions of Future Wales. In combination, these will support policy 28 – National Growth Area – Swansea Bay and Llanelli, recognising that what happens in Pembrokeshire will benefit other areas of Wales and the UK, are consistent with Policy 29 – Regional Growth Areas – Carmarthen and the Haven Towns (promoting sub-regional growth) and are in alignment with Policy 32 – Haven Waterway and Energy, supporting new renewable and low carbon energy-related development, innovation and investment.	
6i. Does it support the intended 60/40 urban/rural spatial strategy/distribution?	
Closed	

LPA Response: 6i. Of the land allocated for employment use, 58% is allocated within or adjacent to Urban Centres and Other Urban Settlements. Five percent is allocated in or adjacent to rural settlements, and the remaining 37% is away from identified settlements and thus classified as being in the countryside. The strategic allocations are mostly found along the Haven Waterway, at Withybush, Haverfordwest and at Fishguard and Goodwick. This is also true for the strategic employment sites safeguarded under Policy SP 15. When the allocations of Policy GN 9 (employment allocations which are aligned with meeting local demands) and the criteria-based policies that allow consideration of windfall employment proposals are also taken into account, then the Council is of the view that what is being provided is supportive of the intended 60% urban, 40% rural development distribution. Under a 70% urban, 30% rural scenario, the local sites might not be needed, and a more restrictive approach might be taken to windfall employment sites.	
j. Are the policies clear on the expectations for acceptable uses on each site?	
Closed **LPA Response:** 6j. For policies SP 14 and GN 9, the acceptable B-class uses have been indicated. In SP 14, there is additional text referencing uses that are closely related to the main employment use and provisos in relation to B2 uses. For the strategic employment sites referenced in SP 15, use classes are also indicated.	
6k. Policy SP 14 - What does 'other uses closely related to the main employment use' mean in scale and type/use? Closed	
LPA Response: 6k. Not all major industrial uses on strategic sites fall within the parameters of the B-class uses. There are some sui generis uses which are of a broadly similar nature, for instance power stations, sub-stations, battery storage proposals and such like. Sometimes these uses can be of a significant scale, but on other occasions they may be ancillary to the main use, so it is difficult to generalise. Looking across to safeguarded strategic employment sites in Policy SP 15, the Pembroke Power Station site is identified as being a sui-generis use but is clearly closely related to other major industrial uses along the Haven Waterway and indeed has infrastructure connections to more than one. Most renewable energy proposals are also sui generis, and applications are being made for such uses on major industrial sites, sometimes with functional linkages. Some waste management facilities are also appropriate for location on employment sites – these are also sui generis.	
6l. Policy GN 9 – Is the final paragraph clear on circumstances where other uses may be supported? Is there a conflict between the current wording and the allocation of sites for B-use classes to meet identified needs?	
Closed	

LPA Response: 6l. Proposals for the uses listed in the policy GN 9 table for each site will be supported by the Council. There are likely to be occasions in the future when uses other than those set out in the table are proposed on the sites allocated by policy GN 9. These may be for B-class uses not specified in the table for a particular site, or for non B-class uses, including sui generis uses. As it is not possible to predict what may or may not come forward in that regard, on reflection the Council has concluded that it would be best to delete the final sentence of the policy in its entirety. A Matters Arising Change to that effect is therefore proposed. This can be found in Appendix A Part 1 Policy Edits[c] to the hearing statement. The implication of making this change is that if a use is proposed on one of these sites that does not conform with the policy GN 9 table, and the Council wished to accept it, then policy departure procedures would need to be followed.	
6m. How and when are the allocations in Policies SP 14, GN 9 and GN 10 anticipated to come forward? What is the justification for these assumptions?	
Closed **LPA Response:** 6m. For the strategic employment allocations in SP 14, these would be anticipated to come forward within the Plan period, in many cases in conjunction with the roll-out of Celtic Freeport projects and benefitting from the fiscal advantages that the Freeport will confer. For the Policy GN 9 allocations, in some cases these have been included following successful Candidate Site or Alternative Site submissions and developer interest has been expressed, hence there is a reasonable prospect of their development during the Plan period. Other GN 9 sites are partially built-out local employment sites from earlier plans where developer interest is continuing to be demonstrated / build-out is continuing. For the Policy GN 10 sites, one is an existing commitment, with permissions being renewed but no build-out yet, while the other is currently under construction (and in fact nearing completion).	
6n. Should details of the employment allocations (ED12b[24], ED12h[25] and ED12j[26]) be included in the Plan?	
Closed **LPA Response:** 6n. The Council is intending to put the information in these documents (the site files for the various types of employment sites) into a Development Sites and	

[24] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12289&language= ED12b
[25] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12295&language= ED12h
[26] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12297&language= ED12j

Infrastructure Supplementary Planning Guidance document, following LDP 2 adoption. There would then be public consultation on the content prior to their adoption by the Council as SPG.

It is the view of the Council that this level of detail would be better in SPG than in LDP 2 itself. Nonetheless, draft copies of the information have been made available to assist at LDP2 Examination, demonstrating that the Council has investigated site constraints and infrastructure requirements for allocated employment sites (and indeed all allocations) in depth.

7. Policy GN8
7a. Is the policy consistent with Policy SP 11, national policy and guidance?

Closed

LPA Response:

7a.Policy SP 11 is the strategic policy which discusses Countryside locations. Development in such locations is supported by SP 11 where it is an essential requirement for people who live and work there and where it respects the landscape setting and the natural and built environment. Where development is supported in such locations, it will be expected to minimise visual impact and to be one of five categories, these being:

a. Enterprises for which a countryside location is essential, including One Planet Development;
b. Rural Enterprise Workers' housing, to support their employment;
c. Agricultural diversification schemes;
d. Re-use and conversion of appropriate existing buildings; and
e. Growth of an existing business provided there are no unacceptable impacts.

(The above list paraphrases the categories presented in LDP 2)

Policy GN 8 would permit employment proposals in countryside locations in certain circumstances:

1. On sites that are allocated for employment purposes by policies SP 14 and GN 9 that are not in a settlement (and noting that the reference to GN 9 is a proposed MAC (See Appendix A, Part 1 Policy Edits Policy[c]) as the Plan currently says GN 7 in error);
2. On sites adjacent to a Settlement Boundary, if no sites are allocated for employment purposes and / or within the same Settlement Boundary exist to serve the development.
3. In countryside locations, but only if no other suitable sites exist in the local area and where the enterprise requires such a location.
4. Where conversion of a traditional building outside a Settlement Boundary is proposed.

(Again, the above list paraphrases the categories presented in LDP2 and only mentions those directly relevant to this question)

As drafted, Policy SP 11 (Countryside) does not refer to all of the types of

development that may be permitted in the countryside. An amendment is proposed to Policy SP 11 to address this issues. This can be found in Appendix A Part 1 Policy Edits to the hearing statement Matters Arising Changes [c].	
7b. Criterion 1 – is 'above' and 'below' superfluous? Should Policy GN 7 be GN 9?	
Closed **LPA Response:** 7b. Agree – the use of 'above' and 'below' is not needed. Also agree, the reference to Policy GN 7 should, in fact, be to Policy GN 9. This is a typographic error. Therefore, a Matters Arising Changes will be prepared for this criterion. This can be found in Appendix A Part 1 Policy Edits to the hearing statement. Matters Arising Changes [c].	
7c. How would criteria 3 and 4 work in practice?	
Closed **LPA Response:** 7c. For criterion 3, the assessment would simply require a factual check. For criterion 4, it would partly be a matter of carrying out a factual check, but there would also be a requirement for an applicant for planning permission to explain why the enterprise needed to be in that particular location. In each case, the information presented in the Council's Employment Land Surveys will be used alongside LDP 2 and records of planning permissions to establish whether the requirements of the criteria could be met.	
7d. Criterion 4 – what does 'local area' mean?	
Closed **LPA Response:** 7d. On reflection this criterion could usefully be clarified to allow rural enterprises in a countryside location to be permitted where this is demonstrated to be essential. The evidence would need to be provided by the applicant and be judged on a case-by-case basis. Therefore, a Matters Arising Changes[c] will be prepared for this criterion. This can be found in Appendix A Part 1 Policy Edits to the hearing statement.	
7e. Criterion 6 – should it refer to 'traditional' instead of 'agricultural' buildings?	
Closed **LPA Response:** 7e. The cross-reference from GN 8 is to policy GN 34, which currently refers to traditional buildings, rather than agricultural buildings. However, in response to a separate question, the reference in GN 34 to traditional buildings is, in part, proposed for replacement with the term 'rural buildings' - and this change will affect the employment element of GN 34. A Matters Arising Change [c] is therefore needed to provide clarity. The proposed Matters Arising Change will replace 'agricultural buildings' with	

'rural buildings'(rather than 'traditional buildings'). This can be found in Appendix A Part 1 Policy Edits to the hearing statement.	
7f. Should the final sentence refer to criterion 2B and/or is it needed?	
Closed **LPA Response:** 7f. The Council considers that this reference is needed. Criterion 2 of GN 1 was split into two parts - 2A and 2B, through a Focussed Change (FC5.GN01.03), but policy GN 8 has not caught up with this. There is therefore a consequential change required. The Council is of the view that the cross reference should be to both criterion 2A and 2B of GN 1 and proposes a Matters Arising Change [c] to address that matter. This can be found in Appendix A Part 1 Policy Edits to the hearing statement.	
7g. How would para 5.65 work?	
Closed **LPA Response:** 7g. The Council considers that policy GN 8, criterion 4, is sufficient without the additional text provided in paragraph 5.65, which on reflection seems to be unnecessary. A Matters Arising Change [c] proposing deletion of paragraph 5.65 is therefore proposed. This can be found in Appendix A Part 1 Policy Edits to the hearing statement.	
8. Safeguarding employment sites (Policies SP 15 and GN 11) 8a. Are both policies sufficiently flexible and consistent with national policy and guidance?	
Closed **LPA Response:** 8a. The Council is of the view that the policies are consistent with national policy and guidance, including section 4.6 of Welsh Government's TAN 23 on Economic Development (SD102[27]). The safeguarding provided for strategic employment sites by Policy SP 15 is intended to be absolute, reflecting the strategic importance of these sites to the local, regional and national economy. Policy GN 11 provides an element of protection for the non-strategic sites, requiring a clear justification to be provided before an alternative use is accepted. However, the policy test is less severe than for the strategic sites, requiring one of three criteria to be satisfied.	
8b. How and why have the sites listed in Policy SP15 been selected? Does the evidence support the likelihood of continued employment use?	
Closed **LPA Response:** 8b. The sites listed for safeguarding in Policy SP 15 are identified in the Two County Economic Study (TCES) (SD19.1 to SD19.6 inclusive[28]) as being of strategic economic importance locally, regionally and nationally. In this case, the sites are already partially or substantially developed, although there will on	

[27] https://www.gov.wales/technical-advice-note-tan-23-economic-development SD102
[28] https://www.pembrokeshire.gov.uk/local-development-plan-review/submission#:~:text=(SD19.1)%C2%A0Two,2020%2D21%20update SD19.1-SD19.6

many of them be parcels of land within the site boundaries that could still be developed or that might be re-purposed (albeit still for industrial purposes). To re-iterate an earlier response, the Council has largely followed the approach suggested by the TCES in defining its Strategic Employment Sites, with the larger than local Strategic Employment Sites list across Pembrokeshire and Carmarthenshire set out in the Study – see the final paragraph and the bulleted list that follows it on page 44 of the TCES Final Report (SD19.1[29]). In this case, the Policy SP 15 safeguarded sites are those in Pembrokeshire that were not allocated under Policy SP 14 – because they already demonstrate a significant element of development. The Council is of the view that all the Policy SP 15 sites will continue in employment or similar uses (e.g. power generation, energy storage, renewable energy-related uses and in some cases waste management facilities) into the foreseeable future. In many cases, they will be critical to the roll-out of the Celtic Freeport proposals.	
8c. How would criteria a and b in Policy SP14 work in practice? What are 'exceptional circumstances'?	
Closed **LPA Response:** 8c. Criterion a) refers to a non-employment use being closely related to the main employment use. Criterion b) refers to exceptional circumstances. For criterion a, the Council notes that there are some sui generis uses which are of a broadly similar nature to B-class uses, for instance power stations, sub-stations, battery storage proposals and such like. Sometimes these uses can be of a significant scale, but on other occasions they may be ancillary to the main use, so it is difficult to generalise. Looking across to safeguarded strategic employment sites in Policy SP 15, the Pembroke Power Station site is identified as being a sui-generis use but is clearly closely related to other major industrial uses along the Haven Waterway and indeed has infrastructure connections to more than one. Most renewable energy proposals are also sui generis, and applications are being made for such uses on major industrial sites, sometimes with functional linkages. Some employment sites are also suitable for waste management facilities, another sui generis use. In that context, retention of this criterion is justified. The exceptional circumstances in criterion b are not defined, and on reflection the inclusion of this criterion might result in a wider range of economic uses being accepted on a safeguarded employment site. There is a danger that this might compromise the retention of the listed sites for strategic employment purposes and therefore a Matters Arising Change [c] is proposed to remove criterion b. This can be found in Appendix A Part 1 Policy Edits to the hearing statement.	

[29] https://www.pembrokeshire.gov.uk/objview.asp?object_id=7370&language= SD19.1

8d. Are the criteria in Policy GN 11 clear, effective and proportionate?	
Closed **LPA Response:** 8d. The Council considers that the criteria of the policy are clear, effective and proportionate. The policy affords a degree of protection for non-strategic existing employment sites but does not preclude their re-use for another purpose if one of the listed policy criteria is satisfied. A very similar approach is used by the current LDP and has been found to work in practice, providing some protection for the employment use but providing flexibility by allowing a different use if it has been adequately justified.	
8e. Should the second bullet point in para 5.80 (under Policy GN 11) specify an indicative minimum period for the evidence in question?	
Closed **LPA Response:** 8e. A good practice note has been prepared on this for Policy GN.8 of the Council's current LDP[30]. A similar approach could be taken for LDP2, but the Council would welcome the Inspector's views on this and would be prepared to make a Matters Arising Change to provide an indicative minimum period if the Inspector considers this a better approach.	
Retail, leisure, community and tourism	SH/CR
Retail 9. Is Policy SP 16 based on robust evidence and consistent with national planning policy and guidance in respect of retail needs?	
Closed **LPA Response:** 9. The background paper on Retail and Commercial Centres (ref SD53[31]) details that The South West Wales Regional Retail Study (February 2017) (SD31.1[32]) was prepared to inform the Local Development Plan review and in doing so provide a robust evidence base for LDP2. The Study forecasts retail need up to 2036 (3 years beyond the LDP2 period) across the region and it's findings remain valid. National planning policy and guidance has been updated since both documents were prepared, but the Government's objectives for retail and commercial centres have not changed (SD53[31], para 2.2; PPW Edition 12, para 4.3.3). There have been significant changes within the retail sector in the intervening period, with previously identified trends towards increased online shopping accelerated by the Covid-19 epidemic (SD31.1[32], Section 3). World events and Brexit have also resulted in economic challenges for both household expenditure and retail businesses. However, at the time the study was prepared the forecasts were already suggesting negative growth/static growth for convenience spend and lower growth rates for	

[30] Good Practice Advice Notes - Pembrokeshire County Council (Scroll down to find the document referring to Local Development Plan policy GN.8 Protection of Employment Sites and Buildings).
[31] https://www.pembrokeshire.gov.uk/objview.asp?object_id=3638&language= SD53
[32] https://www.pembrokeshire.gov.uk/objview.asp?object_id=3255&language= SD31.1

comparison (SD31.1[33], para 3.4) and rising levels of online shopping (SD31.1[33], Tables 3.2 & 3.3).

The overall effect of these changes is that the growth in available expenditure to support retail floorspace has been even slower than previously anticipated, meaning it will take longer to reach the levels of need forecast in the Regional Retail Study (SD31.1[33]). Although these are national trends, the effects are likely to be similar across the whole of Pembrokeshire.

It would be expected that it would now take longer to reach some of the levels of floorspace requirement forecast than suggested in the study, but, as these forecasts were already considered too low to require any retail site allocations, the Regional Retail Study and the Background Paper (SD53[34]) remain a robust basis on which to assess retail needs,

Retail Hierarchy

The Plan continues to protect the established retail hierarchy, as shown in Appendices 1A and 1B of the Retail and Commercial Centres 2019 Background Paper (SD53[34]) and supported by the evidence contained in the South-West Wales Retail Study (ref SD 31.1[33]) with a sub-regional town centre at Haverfordwest, Town Centres in the other main towns of Fishguard, Milford Haven, Narberth, Pembroke and Pembroke Dock and local retail centres across some of the smaller towns and Service Centres at Crymych, Goodwick, Johnston, Kilgetty, Letterston and Neyland. All of these have established retail areas and are in the most accessible locations in the Plan area. These areas are identified as being the most appropriate and sustainable locations for a range of development that will support their long-term health and vitality.

It is considered that the Study, along with data collected through the annual retail surveys provides a robust evidence base.

Retail Need

The South-West Wales Retail Study (ref SD 31.1[33]) includes a quantitative retail need assessment and considers how forecast retail floorspace should be accommodated. The majority of the forecast growth across all centres in Pembrokeshire (up to 2036) including those in the National Park, is for comparison floorspace which should be directed to Haverfordwest town centre as a priority. A need for comparison floorspace by 2036 arising in Fishguard should similarly be directed to the town centre. Comparison floorspace for Pembroke and Pembroke Dock by 2036 should be considered in the context of wider plans for the towns and availability of sites. No additional need was identified for Milford Haven and Narberth.

Whilst the Study was completed some time ago, and it is acknowledged that the assumptions that informed the convenience and capacity

[33] https://www.pembrokeshire.gov.uk/objview.asp?object_id=3255&language= SD31.1
[34] https://www.pembrokeshire.gov.uk/objview.asp?object_id=3638&language= SD53

forecasts have changed, these changes would not be of a scale to affect the overall advice. The Study's forecasts indicate relatively limited retail need in the area, reflecting the population levels in the area. It concludes that up to 1,244 sqm net of additional comparison space would be required by 2031 increasing to 4,973 sqm net in 2036, although both long-term forecasts always needed to be treated with a degree of caution (SD31.1[35], para 9.5). These forecasts (set out in Appendix 10A) (SD31.3[36])) make allowance for known commitments (Appendix 7) (SD31.3[36]) and not all schemes have been implemented, reflecting the decreased demand for new retail comparison floorspace. The policy decision therefore to not allocate new sites for comparison development but instead encourage any new comparison floorspace development within Haverfordwest and other defined centres remains appropriate. Planning Policy Wales (paragraph 4.3.14)SD80 [37] advises that there is no requirement to demonstrate the need for developments within defined retail and commercial centre boundaries and that this approach reinforces the role of centres as the best location for most retail, leisure and commercial activities. It further advises at paragraph 4.3.9 that where no sites are allocated, planning authorities should include criteria-based policies against which proposals can be assessed. See Policies GN 31 (Town Centre and Local Retail Centre Development) and GN 32 (Out-of-Centre Retail and Commercial Development). For convenience retail, the Study concluded that there was no capacity for new floorspace, even if the committed Sainsbury's scheme in Haverfordwest did not proceed (SD31.1[35], paras 10.8 – 10.9). More significantly though there was no capacity for further development even before the other commitments were allowed for (SD31.1[35], Appendix 8A). The decision to not allocate new sites for convenience development remains appropriate. It is based on robust information and it is considered that this approach is consistent with the requirements of national policy and guidance.	
10. How have the findings of the South-West Wales Regional Retail Study informed the Council's retail strategy? a. Should the Plan include allocations for convenience and/or comparison goods floorspace? b. Is the retail hierarchy based on credible evidence?	
Closed **LPA Response:**	

[35] https://www.pembrokeshire.gov.uk/objview.asp?object_id=3255&language= SD31.1
[36] https://www.pembrokeshire.gov.uk/objview.asp?object_id=3257&language= SD31.3
[37] https://www.gov.wales/planning-policy-wales SD80

10. Please see the response to question 28 of the Preliminary Questions (Doc ref [38]SD13.1) and the response to question 9 above. 10a. Please see the response to question 28 of the Preliminary Questions (SD13.1[37]) and the response to question 9, above. 10b. Yes. The retail hierarchy is supported by the findings of the South-West Wales Retail Study (Ref SD31.1[39]). Please see the response to question 28 of the Initial Questions (Doc ref SD13.1[37]). The Study established 5 tiers of centres with Haverfordwest as a sub-regional centre, Pembroke and Pembroke Dock as primary town centres and Fishguard, Milford Haven and Narberth in the 3rd tier as secondary town centres. In the Retail and Commercial Centres Background Paper (ref SD53[39]) it is recognised that this hierarchy fails to take account of the potential future roles of centres (paragraph 3.4). Instead, the retail hierarchy for LDP2, as set out in Policy SP 16 groups the second and third tiers into town centres, whilst Haverfordwest remains as a sub-regional centre. Paragraphs 4.106 to 4.110 provide a description of each of the centres, defining the unique characteristics of each to support their definition as a town centre. Appendices 1A and 1B of the Background Paper (SD53[38]) demonstrate this established hierarchy.	
11. Are the town centre, primary and secondary retail frontage boundaries justified based on robust evidence? Do they respond appropriately to the Plan's issues and objectives?	
Closed **LPA Response:** 11. It is considered that the defined Town Centre Boundaries and Primary and Secondary Frontages are based on robust evidence. Please see response to question 9 regarding the South-West Wales Retail Study ([40]SD31.1). The extent of the boundaries needs to be considered alongside the proposed policies and the policy ambitions to encourage as much appropriate development to locate within Town Centres as possible. As such, the aim has been to seek to maintain sufficient premises within the defined boundaries to accommodate potential future demand, whilst acknowledging the decline in the demand for physical retail premises. This has been achieved by reviewing the boundaries and frontages in each Centre and promoting Policy GN 31 which seeks to allow a wider variety of uses, not just retail in the Primary and Secondary Frontages. The annual retail surveys undertaken by the Council demonstrate that most of the town centres have suffered some decline, consistent with experiences across most of Wales and the wider UK. (See 2023 Retail Report SD38[41]). These trends, set out in the Regional Retail Study (SD31.1) have been exacerbated by both the Covid-19 pandemic and impacts on the UK	

[38] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12084&language= SD13.1
[39] https://www.pembrokeshire.gov.uk/objview.asp?object_id=3638&language= SD53
[40] https://www.pembrokeshire.gov.uk/objview.asp?object_id=3255&language= SD31.1
[41] https://www.pembrokeshire.gov.uk/objview.asp?object_id=11657&language=SD38

economy as a result of Brexit and world events. The Retail and Commercial Centres Background Paper (SD53[42]) recognises the need for Town Centres to adapt and for the extent of boundaries, primary and secondary frontages to be considered. This has resulted in consolidation of Town Centre boundaries in Haverfordwest, Pembroke Dock, Narberth and Fishguard. Some areas in mainly residential uses have been removed from around the edges of these Town Centres. The Town Centre in Milford Haven remains the same, although it has been increased in the Marina by including the buildings around the southern side of the Marina. This is in line with the evidence showing the Marina to have low vacancy rates and it remains popular as a retail and commercial destination linked to leisure and tourism. The Town Centre in Pembroke has remained unaltered. All of the Primary Frontages have been reduced in LDP2, apart from in Milford Marina where it has been increased for the same reasons outlined above. In Haverfordwest and Narberth, the lost Primary Frontage has been included in the Secondary Frontage. In Haverfordwest the Council has been pursuing regeneration of the Town Centre with the publication of a regeneration strategy in 2016 and various investments which remain ongoing. The changes to the frontages are intended to assist by focussing a diminished retail function within smaller areas and allowing a wider range of uses within the remaining areas.	
12. Policy GN 31 a. Does the policy approach in primary frontages encourage and support each centre's vibrancy and viability? Is it consistent with national policy and guidance? b. Is criterion A compatible with para 5.161? Should the reasoned justification on changes of use outside of primary frontages within town centres be included in the policy? c. Is the policy clear and consistent on where residential uses will be supported within town centres and local retail centres? What criteria will be used to consider proposals on the ground floor of secondary frontages? d. How is an 'unacceptable concentration of fast-food takeaways' quantified? What is the evidence for this policy approach? e. Criterion B - Does the policy provide adequate protection for retail and commercial uses in Local Retail Centres? f. Should the reference to marketing in para 5.163 be included in the policy for clarity? Is it clear what existing and proposed uses this provision relates to?	
Closed **LPA Response:** 12a. National guidance set out in section 4.3 of Planning Policy Wales (Edition 12) recognises that primary areas are typically characterised by a high proportion of A1 uses and this has been used to define the Primary Frontages within the identified Town Centres in LDP2. These Primary Frontages represent the principal retail and most accessible locations within the Plan area. Whilst the national policy approach is to guide more mixed uses (including A2 and A3	

[42] https://www.pembrokeshire.gov.uk/objview.asp?object_id=3638&language= SD53

uses) to secondary frontages, Policy GN 31 of the Plan allows for a wider range of uses within the Primary Frontages reflecting the local situation where the potential to attract new commercial development is limited. As set out in paragraph 5.163 of the Plan, this provides a more flexible and pragmatic approach which seeks to encourage a wider range of uses that will generate footfall, minimise vacancies and improve viability. This, along with the rationalisation of the Primary Frontages in the older town centres provides the best opportunities to retain and enhance vitality and vibrancy. 12b. It is agreed that there are differences between the policy and the supporting text. Changes are proposed which will clarify the intention of the policy. Please see Appendix B to the Hearing Statement . 12c. It is agreed that there are differences between the policy and the supporting text. Changes are proposed which will help to clarify where residential uses will be supported. Please see Appendix B to the Hearing Statement. 12d. It is agreed that a definition of 'unacceptable concentration' of fast-food takeaways is required. This is proposed in Focussed Change FC5.GN31.3. (See [43]SD09.3 Appendix 2 – Representation Reports updated 24 September 2025; [44]SD05.2 Focussed Changes; and [45]ED15f LDP2 Text and FC & MACs track changes March 2026). The Consultation Report (SD09.3[41]) also provides a narrative of the evidence for this policy which can be further supported with reference to paragraph 9.4 of TAN4 (Retail and Commercial Development) (SD87) which acknowledges that individual use classes may have a negative cumulative impact when clustered together. Policy GN 31 sets out a clear and pre-emptive approach. Please see Appendix B to the Hearing Statement. 12e. Criterion B of Policy GN 31 (Town Centre and Local Retail Centre Development) encourages proposals within the identified Local Retail Centres which are compatible with the role and function of the Centre. Protection of existing retail uses and certain commercial uses are protected under Policy GN 29 (Community Facilities). Policy SP 16 (Retail Hierarchy) further resists proposals that would undermine the retail hierarchy which would include loss of retail and commercial uses within the Local Centres. 12f. It is agreed that the marketing requirement could be clearer. The proposed policy amendment referred to in the responses to questions 12b and 12c above also includes changes to the supporting text. It is considered that the proposed text will help to define when residential development will be supported. See Appendix B to the Hearing Statements. If these proposed amendments are agreeable to the Inspector the Council can prepare a Matters Arising Change.	
13. Policy GN 32	

[43] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12065&language= SD09.3
[44] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12021&language= SD05.2
[45] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12305&language= ED15f

a. Is the policy approach, including the detail in para 5.171, consistent with national policy's town centre first approach? b. Is it coherent and consistent with Policy GN 57? c. How does para 5.172 relate to the contents of Policy GN 32? Should it be amended/moved?	
Closed **LPA Response:** 13a. There are unintentional differences between the Policy approach and national policy. Changes are proposed which will clarify the intention of the policy. Please see Appendix C to the Hearing Statement for proposed re-wording. It is intended, however, to reduce the size of proposals requiring assessment from the 2500 sqm set in paragraph 4.3.26 of Planning Policy Wales[46] (SD80) to 500sqm net floorspace which takes into account the scale and character of the Town and Local Retail Centres in Pembrokeshire. This has been scaled down to allow assessment of what would be modest proposals at a national level, but would be sufficiently large in the Pembrokeshire scenario to have a considerable impact. 13b. Policy GN 57 (Site Facilities) relates specifically to facilities intended primarily to serve camping and caravan sites and holiday parks. There are many well-established sites throughout Pembrokeshire and Policy GN 57 requires the location of the facilities to be within the sites themselves. Where the caravan/camping sites etc are remotely located, site facilities, such as shops can be open to the wider public and help to provide local facilities. Policy GN 32 (Out-of-Centre Retail and Commercial Development) sets out the policy requirements for proposals intended primarily to serve the general public. Criterion 1 of Policy GN 57 ensures that priority is given to supporting facilities available to the wider public within any defined settlement. This will include facilities within town and local retail centres and other community facilities such as village shops in other settlements. To ensure consistency between Policy GN 32 and GN57, it is proposed to add a sentence at the end of paragraph 5.322 (supporting text to Policy GN 57) to clarify that on-site facilities should be of an appropriate scale to primarily meet the needs of the self-catering accommodation site and that proposals for out-of-centre proposals serving the wider population will be considered under policy GN32. (See Appendix C to the Hearing Statement) 13c. There are unintentional differences between the Policy approach and national policy. Changes are proposed which will clarify the intention of the policy. Please see Appendix C to the Hearing Statement. If these proposed amendments are agreeable to the Inspector the Council can prepare a Matters Arising Change.	
14. Is the Council's retail strategy positive and sufficiently aspirational?	
Closed **LPA Response:** 14. The retail strategy provides a policy framework to help the town centres in the Plan area to adapt and support a wider range of services to support their local communities. The rationalisation of the Primary Frontages and Town Centre boundaries, accompanied by encouragement of flexible retail	

[46] Planning Policy Wales SD80

and other appropriate commercial uses within Town and Local Centres will encourage activity within the centres, improve their vitality and support regeneration strategies, whilst also being realistic regarding the future demand for retail and commercial space. Supporting the vitality and viability of the Town Centres needs to be balanced with realistic expectations and deliverable outcomes and ensuring that only policy-compliant development at the edge of the defined Town Centres or out-of-centre is permitted. It is considered that the strategy will achieve this balance for the rest of the Plan period.	
Community facilities and open space	
15. Policy GN 29 a. Criterion A – how is 'well related to the community' defined? Would this apply to countryside locations, and would this be consistent with Policy SP 11?	MD
b. Is criterion B clear and precise on its aims and how it would be implemented?	
c. Criterion C – would it be necessary to satisfy all criteria if changing use from one community facility to another? Is that effective and proportionate?	
d. Criterion C1 – is it clear how proposals can demonstrate they are no longer viable? How and why is this different from the provisions under criteria 2 and 3?	
e. Criterion C2 – Why should premises be vacant before they are marketed? Is this reasonable?	
f. Criterion C3 – how would proposals demonstrate they are surplus to requirements? Is this the same, or different, to having adequate alternative provision?	
Closed **LPA Response:** 15a. The Policy wording is proposed for change to focus on meeting the community's needs. These needs may vary depending on the facility required and what the catchment for that community is. The policy does, however, seek to ensure that the facility is convenient to public transport and other services where this is required to serve the needs of the user. For the most part community facilities are likely to be located within or closely related to a settlement. It would be unreasonable, for example, to expect a new cricket ground to find a location within settlement boundaries. The policy could also clarify that the provision of community facilities is expected to be located within or closely related to settlement boundaries (please see the Glossary for an explanation of closely related to). This policy is consistent with Policy SP11. 15b. In terms of criterion b) extensions to facilities requirements, the focus here should be on the needs of the community that use the facility justifying the proposed extension. 15c,d,e and f. Criterion c) could be simplified. This policy and reasoned justification require editing to provide clarity on	

the aims of the policy. A suggested re-wording is proposed below: **GN 29 Community Facilities (proposed new wording)** **The provision and protection of community facilities will be achieved as follows:** **a) New community facilities will be permitted where they are well located to meet the community's needs, and they are convenient to public transport and other services, where this is required to serve the needs of the user. The provision of community facilities will be required to be located within or well related to settlement boundaries.** **b) Extensions, alterations and improvements to existing community facilities will be permitted where the community's needs justify them.** **c) Development which would adversely affect the operation of a community facility, or results in its loss will not be permitted except where a suitable replacement or enhanced facility is to be made available or where it can be shown the facility is no longer required or is not commercially viable.** Reasoned Justification: Replace paragraph 5.157 with: With regard to criterion c) matters that may be addressed to show the community facility is no longer required can include demonstrating the facility has remained unused or underused over a long period of time. Evidence can include: ▪ Community needs assessments. ▪ Surveys of local residents. ▪ Evidence of declining membership or usage. ▪ Demographic analysis showing no future demand. Commercial viability is a test for commercial enterprises. Evidence typically used to support applications includes: ▪ Audited accounts (usually 3 years). ▪ Details of operating losses. ▪ Maintenance liabilities. ▪ Professional viability assessments ▪ Lack of demand by prospective operators as evidenced by appropriate marketing for sale or rent for 6 months or more. Evidence can also include efforts to secure its long-term use including opportunities- for part-time working/opening or, merging with other facilities to maintain viability. Failed opportunities where public funding was sought to support facilities can also be considered as evidence. If this proposed re-wording is considered appropriate by the Inspector the Council can prepare a Matters Arising Change.	
16. Policy GN 30	SH(BS)

a. How has the Plan identified the need for new community facilities? How has this evidence informed site allocation choices? b. Should details of the community facility allocations be included in the Plan? c. How and when are the allocations anticipated to come forward? What is the justification for these assumptions?	
Closed **LPA Response:** 16a. Both of the Community Facilities allocations are for schools, the need for which has arisen from consultation with the Education Authority within the Council. The need for redevelopment of Milford Haven School was identified prior to 2019 as part of the 21st Century Schools programme with funding from Welsh Government. The site for the school development was submitted as a Candidate Site (site reference 304 in the Candidate Site Register (SD08.4[47]) and assessed as being suitable as an allocation in the Plan. The other community facilities allocation is for a new primary school within the wider housing allocation at Slade Lane. The need for the new primary school was identified from the outset, due to the size of the development, this being the largest residential allocation in Pembrokeshire. A site is allocated for that purpose in the current LDP (on land in Council ownership), but more recent discussions have moved it to another part of the site. Welsh Government asked the Council to include the new school site within the residential allocation for LDP2, rather than identifying it as a separate Community Facility allocation, with a view to ensuring that it was fully integrated with the master-planning of the site. Developer contributions towards the new primary school will relate to the need generated by the new development. Should the new school be required to serve a wider catchment, then the Education Authority will need to provide additional funding. No need was identified to allocate land for other community facilities but Policy GN 29 (Community Facilities) provides a criteria-based policy for consideration of proposals coming forward in the Plan period.	
17. Policy GN 51 a. Is the policy clear on its extent and scope? Does this extend beyond sites included on the Proposals Map? b. Criterion A – should deficiencies of outdoor recreation space also be a factor to consider? c. What is the Plan's approach for new open space, including standards of provision? Would new development be expected to contribute towards open space facilities? d. Para 5.291 – would playgrounds be covered under Policy GN 29 or GN 51?	SH
Closed **LPA Response:**	

[47] https://www.pembrokeshire.gov.uk/objview.asp?object_id=11579&language= SD08.4

17a. Whilst only sites of 0.25ha and above have been identified on the Proposals Map, the policy is intended to protect all areas used for outdoor recreational space. This can be clarified with a slight amendment to the wording of paragraph 5.284 – see Appendix A Part 1 Policy Edits to the Hearing Statements [c]. 17b. It is agreed that in line with national policy (See paragraph 4.5.4 of Planning Policy Wales (SD80) the policy should include a criterion relating to an excess of recreational space. See Appendix A Part 1 Policy Edits to the Hearing Statements. [c] 17c. Policy GN 51 sets out the criteria for creating new recreational space. Policy GN 3 (Infrastructure and New Development) sets out a requirement for the provision of recreational open space to be provided where new development generates a directly-related need. Need for such provision will be based on the findings of the Open Space Assessment set out in the Open Space 2019 Background Paper (See SD49[48]). The standards of provision for new developments will be based on the Fields in Trust guidance and set out in updated Supplementary Planning Guidance on Planning Obligations. 17d. Playgrounds will be considered under Policy GN 51. They do also play a role regarded as a community facility – Policy GN 29 Community Facilities.	
18. Policy GN 52 a. Is the scope of this policy justified? What evidence is it based on? Does this include any standards of provision? b. Is the policy clear on its requirements? What does 'adversely affect' mean in the policy? c. Is the extent of open space designated at Slothy Mill (Ref OSP/095/23 and Focussed Change FC5.GN52.Pembroke.01) justified? d. Is the amenity open space adjacent to housing allocation HSG/029/00014 (Opposite Woodholm Close, Crundale) justified?	SH / BS
LPA Response: Closed 18a. National planning policy requires the protection of open spaces which have significant amenity or recreational value. Paragraph 4.5.5 of Planning Policy Wales (SD80)[49] states *"Planning authorities should protect playing fields and open spaces which have significant amenity value to local communities from development".* Such spaces can contribute significantly to the character and value of townscapes or within and surrounding groups of buildings for example, and to the overall sense of place of an area. A definition of Amenity Open Space is included in the Glossary. There is no standard of provision as the spaces are generally not quantifiable but rather are part of the design and layout within built areas. Such spaces have been shown on the Proposals Map, although the nature of spaces that provide amenity value varies to such an extent that it is highly unlikely that all of them could be, and have been mapped. It would be unfortunate if spaces providing amenity value did not have protection from development due to being omitted on the proposals map. The Council would welcome the Inspector's views on removing amenity areas shown on the proposals map and instead inserting additional text	

[48] https://www.pembrokeshire.gov.uk/objview.asp?object_id=7697&language= SD49
[49] Planning Policy Wales - Edition 12 SD80

to paragraph 5.292 of the supporting text to Policy GN 52 to provide a fuller description of types of areas considered to be protected under this policy, aligned with paragraph 4.5.3 of Planning Policy Wales (SD80) and TAN 16 (Sport, Recreation and Open Space (SD97)) along with a clarification that proposals resulting in the loss of amenity space will be considered on a case-by-case basis.

The reference to the Fields in Trust Guidelines in the supporting text is not helpful in this context as it relates to recreational open space. It is proposed that paragraph 5.295 be deleted from the Plan. (see Appendix A Part 1 Policy Edits to the Hearing Statements). [c]

Closed

18b. The policy cannot be overly prescriptive as amenity spaces and the particular contribution they make to a place varies greatly. It is clear from the policy that the areas will be protected from development that would negatively affect their character, purpose, appeal or use but for the same reasons of diversity, an adverse effect would need to be a judgement made on a case-by-case basis.

Closed

18c. Candidate Site 087[50] (SD08.5) sought a residential development on land at Slothy Mill, Well Hill, Pembroke. This proposal was rejected by the Council on highway grounds, and an open space designation was instead put in place in this same locality. During the LDP2, Deposit Plan 2 public consultation, objections were received challenging the highway objection to the land being identified for housing development and questioning the open space designation, asserting that it had been put in place to meet a shortfall of amenity open space provision within Pembroke, as identified in the Open Space Background Paper (document SD49[51]).

In its response to the open space objection to the LDP2, Deposit Plan 2 public consultation, the Council noted that the methodology for designating open space is set out in the Open Space Assessment Background Paper. To be designated as open space, land is required to meet one of the characteristics listed in paragraph 5.4, these being:

- Public parks and gardens;
- Natural and semi-natural greenspaces;
- Green corridors;
- Outdoor sports facilities;
- Amenity greenspace;
- Provision for children and young people;
- Allotments;
- Community gardens and city (urban) farms;
- Cemeteries and churchyards;
- Accessible areas of countryside in the urban fringe;
- Civic spaces; or

[50] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12070&language= SD09.7
[51] https://www.pembrokeshire.gov.uk/objview.asp?object_id=7697&language= SD49

- Water.

The Council also noted that land is not designated as open space to meet a target area for a settlement, as the objection had suggested.

Nonetheless, a re-evaluation was carried out for this amenity open space designation, the outcome concluding that the western part of the designated area should not have been designated as open space as it appeared to be in agricultural use and therefore did not meet the any of the criteria set out above. Hence, the extent of OSP/095/23 was reduced through LDP 2 Focussed Change FC5.GN52.Pembroke.01.[52]

The LDP 2 Focussed Change also attracted representations, some of which suggested that the removal of the western portion of the amenity open space designation would enable the land to be developed in the future. The Council, in its response (document SD09.7[53]), noted that Candidate Site 087 (Land at Slothy Mill, Well Hill), which covered a similar portion of land to the area removed from the OSP/095/23 designation, was submitted for consideration as a designated site for residential development. However, the Highway Authority had reviewed Candidate Site 087 (capable of accommodating approximately 12 residential units) and has strongly objected to the residential proposal, due to significant constraints that it considered could not be mitigated. The site was therefore not considered an appropriate site for residential development and the land thus remains outside the LDP 2 Pembroke Settlement Boundary.

There was also a representation which supported the Focussed Change to amend open space reference OSP/095/23 by removing the western section, noting that there was no right of public access to the land at Slothy Mill and suggesting other locations in which open space was available for public use.

Thus, as things currently stand, OSP/095/23 is still in place, but it is a reduced provision in comparison with that put forward in LDP 2, Deposit Plan 2.

Closed

18d. To understand the broader considerations that led the Council to propose an amenity open space designation adjacent to housing allocation HSG/029/00014, it is necessary to set out the details relating to the residential allocation in this part of Crundale village. This is presented below:

i) During the LDP 2, Deposit Plan 1 consultation in 2020, PCC was made aware that abnormal site costs were making the delivery of existing residential planning permissions in this part of Crundale village problematic.

ii) Planning permissions had previously been granted for a residential development encompassing land at Rhoswell Farm and along the south-east frontage of Chapel Road for 15 dwellings. A 16th plot was also included in the layout for this site, but was not given planning permission, as it was outside the current (LDP1) Settlement Boundary.

[52] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12021&language= SD05.2
[53] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12070&language= SD09.7

	The buildings at Rhoswell Farm have been demolished and a start has been made on the re-development of the site. Document SD09.5[54] - Appendix A (page 28) - shows the extent of this site in white along the road frontage with a triangular piece of land with plots shown to the south-west.	
iii)	A part of the abnormal cost was attributed to the length of the estate road required but further costs were arising from the presence of a 14-inch cast iron strategic trunk water main and the need either to re-locate this or accept a substantial easement within which development could not occur and water company access would be required.	
iv)	Broader considerations in Crundale village are that Chapel Road, has attracted a Highway Authority objection and that there is another Candidate Site submission (HSG/029/LDP2/1 – West of Ashford Park) that is without either highway or water main constraints.	
v)	On the basis that the current planning permissions relating to this land did not seem capable of implementation, and in the interests of trying to find a fair solution for the affected landowners, PCC put forward a new proposal in LDP2, Deposit Plan 2, which recognised the permission on the Rhoswell Park element of the site, but set back the permitted frontage element of the permitted development along the south east frontage of Chapel Road to reflect what had already been committed in numerical terms. The frontage land with the residential planning permission was designated as Amenity Open Space and a residential allocation (HSG/029/00014 – Opposite Woodholm Close) was put in place behind this for 15 dwellings, as a compensatory provision. This was a recognition that much of the previous planning permission was considered to be incapable of being built out without the considerable expense of relocating the water main. It was also a recognition of the highway constraint, where the position at Deposit Plan 2 stage was to accept the number of units already with permission, but nothing further. It should also be noted that a further Candidate Site adjacent to Chapel Road (CS 417 – North of Wallis Park[55] SD08.1) was rejected outright on highway grounds.	
vi)	The rationale for the above approach was that PCC was attempting to resolve the viability constraint attributed to the length of estate road required for the previously permitted development and the significant cost that would be involved in re-locating the raw water main. It was also a recognition that the previously permitted layout was prepared some years ago and did not appear to have given sufficient weight to various matters including the protection of trees and hedgerows wherever possible and the consideration of ecological matters. Hence, the proposals of LDP 2, Deposit Plan 2 did not ignore or fail to recognise the earlier permissions but rather were put forward to seek an alternative solution that was fair the landowner, recognised the identified	

[54] Appendix 4 - Issues Papers updated 23 September 2025 SD09.5
[55] Candidate site register and site assessment - settlements A-C SD08.1

	constraints and presented an alternative approach that could take account of up-to date Planning Policy Wales considerations in relation to tree protection and ecology. Essentially, PCC considers that a re-design of the layout at this site would be capable of embedding modern place-making principles.	
vii)	However, the representors, through their agent, have indicated that their preferred way forward is to build out the existing planning permission, which would involve moving the water main to allow the already permitted frontage element of the development (as well the element on the former Rhoswell Farm site) to go ahead as originally envisaged. Recognising the costs involved, they would also wish to see the LDP 2, Deposit Plan 2 allocation remain in the Plan, as a means of offsetting the estate road costs and the costs associated with moving the raw water main. That would allow the original design concept to go ahead as previously conceived, which would not be possible under the LDP2, Deposit Plan 2 proposal, and provide a further phase of development to help meet the abnormal costs. Under the representors' proposals, the Open Space provision of LDP2, Deposit Plan 2, would be deleted. The representors also have an aspiration for a phased build-out of the whole field. In the document titled Appendix 4 – Issues Papers updated 23 September 2025 SD09.5[56], the maps included as Appendix A and Appendix B show the representors' ideas of how the layout might work with the existing permissions and a similarly sized allocation (Appendix A) and also for the mooted eventual phased release of the whole field for residential development purposes (Appendix B).	
viii)	Having given the matter further thought, PCC recognises that there are a variety of approaches that could be made to work at this site. Focussed Changes were therefore not proposed at this site, as it was considered that a better approach would be to work through the issues and options at an Examination hearing and seek an independent view from the Examination Inspector on the best way forward.	
ix)	To facilitate that future discussion, PCC has re-contacted Highway Authority colleagues, to check whether there has been any change to the highway advice relating to this site. The outcome of that re-consultation is that the scale of development previously permitted (15 dwellings) is accepted and a further 15 dwellings might also now be possible, served from a single access from Chapel Road. This would be subject to: ▪ Adequate visibility being available at the estate road junction (which they advise is possible); and ▪ A footway being provided to link up to village, potentially through the proposed open space area and behind the existing hedge line, along to Parkway Close, so long as it is available to all users and not just future residents.	
x)	The introduction of a 20 MPH speed limit in the village has helped to	

[56] Appendix 4 - Issues Papers updated 23 September 2025 SD09.5

	facilitate that change of view. Hence, there is a little more scope for flexibility on the number of dwellings allowed than was previously the case, although the relaxation of the highway constraint is not sufficient to allow the build-out of the whole field. The availability of an allocated residential site elsewhere in village (HSG/029/LDP2/1- West of Ashford Park) with less constraint is also an important consideration, as is the appropriate scale of future development for a service village. xi) The representation from Dwr Cymru Welsh Water on this matter says that (on the basis of a 15-unit development) a water supply can be provided, and the public sewerage network can accept the potential foul flows from the site. It is noted that Merlins Bridge Treatment Works (WwTW) has limited capacity and the growth being proposed for the catchment area may require improvements which would need to be funded through its Asset Management Plan (AMP) or potentially earlier through developer contributions. There was no reference to the raw water main, but this has been the subject of earlier discussions. xii) To conclude, PCC will welcome a further discuss of this matter at an Examination hearing and will welcome the Inspector's consideration of the best way forward. The amenity Open Space designation would be logical with the Council's proposal to set the residential development further back in the site and leave the raw water main in-situ. However, there would be a reduced need for the amenity open space designation under the representor's alternative proposal, as the water main would be re-located, and thus the land affected by the safeguarding requirement would also change. Nonetheless, PCC's concerns regarding trees and hedgerows and ecological matters might still justify a modified amenity open space provision being retained under the representor's proposals. The Council has also asked the Inspector to consider changes to Policy GN 52 (Protection of Open Spaces with Amenity Value) in response to Q18a above and in relation to identifying amenity open space on the Proposals Map. The outcome of that consideration will not impact on the amenity value of the land along the frontage of allocation, but will determine if it is defined as such on the Proposals Map. xiii) At this stage, no Matters Arising Changes have been proposed for either the residential allocation or the amenity open space designation, pending further consideration of these matters during the Examination process.	
19. a. b.	Does Policy GN 53 provide an effective framework for the provision of community growing spaces? Criterion 1 – how would a proposal be 'well-related'? Criterion 2 – how would 'local demand' be measured?	MD
Closed **LPA Response:** 19a.	"Well related" is defined in the Glossary of the Plan.	

19b. This has been left open as the route to identifying demand may vary. Common indicators of demand could be: ▪ existing allotment waiting lists; ▪ geographical distribution of that waiting list; and ▪ occupancy rates of existing sites. o Welsh Government guidance refers to supporting the**"demand-led development of new allotments and community growing projects"** and recognises the importance of managing and monitoring provision.[57] Many authorities undertake surveys of residents and community groups to identify: ▪ Interest in allotments. ▪ Interest in communal growing spaces. ▪ Desired locations. ▪ Barriers to participation. Evidence can also include: ▪ requests from community councils, ▪ local food partnerships, ▪ community garden groups, ▪ schools, ▪ health organisations, and ▪ voluntary sector bodies. Welsh Government guidance encourages local authorities and landowners to work with community growing groups and identify opportunities where interest exists. [58] Officers can add a summary of this explanatory text to the reasoned justification if the Inspector considers this will be a helpful clarification.	
Visitor economy	
20. Does Policy GN 54 provide a clear and appropriate mechanism for the management of new visitor attractions and leisure facilities in the county? 20a. Should the reasoned justification clarify small, medium and large-scale proposals? Are there any differences between medium and large-scale proposals within the policy? 20b. Does para 5.302 introduce new criteria (building on distinctiveness) that should be in the policy?	SH
Closed **LPA Response:** 20. The policy is considered to be clear and appropriate. 20a. A definition of 'small-scale' is provided in paragraph 5.304 of the	

[57] https://www.gov.wales/sites/default/files/publications/2021-03/allotments-and-community-growing-guidance-local-authorities-town-community-councils_0.pdf - see page 1.
[58] https://www.gov.wales/sites/default/files/publications/2021-03/allotments-and-community-growing-guidance-local-authorities-town-community-councils_0.pdf - see page 11.

supporting text to the policy. For the purposes of the policy medium and large scale are regarded in the same circumstances and therefore by default are proposals above 0.5 hectares in extent. 20b. The term 'building on the distinctiveness' refers to the last paragraph of the policy which requires all proposals to be sensitive to the landscape, environment, locality and sense of place and does not introduce an additional requirement.	
21. Do Policies GN 55, GN 56, GN 57 and GN 58 provide an appropriate framework for the management of visitor accommodation in the county?	SH
Closed **LPA Response:** 21. Yes it is considered this suite of policies will provide an appropriate framework to consider visitor accommodation proposals. Please also see responses to Questions 22 a to g, 23 a and b, 24 a and b below.	
22. Policy GN 56 a. Is the Caravan Landscape Capacity Study (SD16.1 and SD16.2[59]) robust and based on credible evidence? Does it provide a clear and effective approach to determine seasonal and static proposals in Policy GN 56?	SH
Closed **LPA Response:** 22a. The Study was prepared by an experienced landscape consultancy who were also responsible for preparing the Landscape Character Assessment (SD21[60]). It provides expert guidance utilising the established landscape character areas identified within Pembrokeshire as the basis for assessing the capacity of the landscape to absorb further caravan and camping development. It follows a similar study undertaken for the neighbouring Pembrokeshire Coast National Park Authority which supported the caravan and camping policy approach in their Local Development Plan, adopted in 2020, with that study subsequently being published as Supplementary Planning Guidance to the Plan. It is also the intension to publish the Study prepared for the Council as Supplementary Planning Guidance to support Policy GN 56 (Caravan, Camping and Chalet Development) of the Plan. Policy GN 56 sets out the locational requirements for camping, caravan and chalet proposals and the SPG will help to define if there is capacity within a particular landscape. The Study contains detailed descriptions of each landscape character area and clear guidance of areas that can accommodate additional development without harm to the landscape. Each proposal will need to be considered on its individual merits, but this approach has the advantage of identifying broad landscape constraints and areas suited for development, taking into consideration the scale and type of accommodation proposed and what mitigation may be required.	

[59] https://www.pembrokeshire.gov.uk/objview.asp?object_id=7620&language= SD16.1
https://www.pembrokeshire.gov.uk/objview.asp?object_id=7621&language= SD16.2
[60] https://www.pembrokeshire.gov.uk/adopted-local-development-plan/ldp-supplementary-planning-guidance SD21

22b. Is the explanation of landscape capacity in paragraph 5.311 consistent with evidence in the Caravan Landscape Capacity Study?	
Closed **LPA Response:** 22b. The explanation of the landscape capacity in paragraph 5.311 is taken directly from paragraph 1.2 of the Study. The additional reference in the Study to single caravans has not been included in the text of the Plan, but this can be added if it is thought to improve consistency.	
c. Is the 400m threshold in paragraph 5.3.19 justified and effective? Does it apply to site extensions only?	
Closed **LPA Response:** 22c. The 400m threshold is to ensure a consistency of approach between new sites and extensions to existing sites. New medium and large-scale sites are required to be within or adjacent to the larger settlements in the settlement hierarchy. The approach with extensions to existing sites that would create medium or large sites, takes their established location into account and allows extensions to sites close to settlement boundaries, which offers a slightly more generous approach by allowing consideration of proposals close to all identified settlements. This only applies to site extensions because new medium and large sites are considered under criterion A of Policy GN 56.	
22d. Is Policy GN 56 and the reasoned justification clear on how cumulative impacts will be assessed?	
Closed **LPA Response:** 22d. The cumulative impact of proposals would form part of the landscape impact assessment. The Caravan Landscape Capacity Study (SD16.1 and SD16.2[61]) identifies existing caravan sites (at the time of the study) but this will alter over time as proposals are permitted. Policy GN 1 (General Development Policy) of the Plan is applicable to all development. The first three criteria of GN 1 include detailed matters to be considered. Reference to Policy GN 1 in paragraph 5.320 of the supporting text to policy GN 56 helps to clarify that proposals will require particular scrutiny in the context of GN 1 to assess to cumulative impact.	
22e. Should criterion B refer to accessible locations as per criterion A?	
Closed **LPA Response:** 22e. Whilst directing medium and large sites, with a higher number of visitors to accessible locations, the policy approach recognises that smaller camping and caravan sites are frequently found in more remote locations. This also takes into account that sites can be established through permitted development rights (60-day sites and sites operated by	

[61] https://www.pembrokeshire.gov.uk/objview.asp?object_id=7620&language= SD16.1
https://www.pembrokeshire.gov.uk/objview.asp?object_id=7621&language= SD16.2

Certificated Operators) which have less regulation. The policy applies a degree of equality for those operators seeking planning permission to operate sites.	
22f. How are 'over-concentration' and 'area' defined in criterion 2?	
Closed **LPA Response:** 22f. This relates to the cumulative impact of sites. The Caravan Landscape Capacity Study (SD16.1 and SD16.2) identifies areas where there are concentrations of existing sites. A planning judgement on the overall impacts of additional sites would need to be made.	
22g. Para 5.312 – does this explanation risk delegating criteria for decisions on planning applications to SPG? Should the policy be amended to address the criteria in 5.312?	
Closed **LPA Response:** 22g. Taking into account the response to Q22a above which sets out how the SPG is intended to be used, the sentence in paragraph 5.312 provides a further explanation of how proposals will be considered. It is an 'expectation' rather than a requirement, and provides guidance to applicants, indicating that addressing matters set out for the particular landscape character area should assist with achieving a positive outcome with a planning proposal.	
23. Policy GN 57 a. What does 'best practicable environmental standards' mean in criterion 2? Are the requirements justified? b. Does para 5.323 introduce new criteria that should be in the policy? c. How would the policy operate alongside Policies GN 29 and GN 32?	SH
Closed **LPA Response:** 23a. Please see the response to representation 4387/7 in the Deposit Plan Representation Report (SD09.3[62]). 23b. In this instance, it could be construed that new requirements are being set out in the supporting text to the policy. It is suggested that the wording in the policy is amended to accord with that in paragraph 5.312 (supporting text to Policy SP 56) (see response to Q22g above) – see Appendix A Part 1 Policy Edits to the Hearing Statements[c]	
24. Policy GN 58 a. What is an appropriate balance of uses in the second paragraph? Would this apply to locations within settlements and open countryside?	
LPA Response: **Closed** 24a. As advised in the reasoned justification 5.237 the policy should be read in conjunction with Policy GN 15 on Housing Mix, Second Homes and	MD

[62] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12065&language= SD09.3

	Short-Term Holiday lets. Please see answer to Q 3.a in Hearing Session 4.	
b.	Why are local villages excluded from the policy? Is it consistent with the settlement hierarchy and sustainability principles?	SH
Closed **LPA Response:** 24b.	Focussed Change FC05.GN58.01 deleted the words 'Local Village' from the policy. This was to correct an error. Local Villages are the fourth-tier settlements in the settlement hierarchy. They are generally the smallest of the defined settlements in the Plan and opportunities for additional development more limited. No housing allocations have been made in Local Villages, although market and affordable housing is permitted by the policies of the Plan. The reason for restricting new self-catering accommodation in Local Villages is to ensure priority is given to residential development in these locations. This takes into account the potential for existing properties in residential use to be used for short-term letting purposes.	