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23rd October 2026

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PEMBROKSHIRE COUNTY COUNCIL LOCAL DEVELOPMENT PLAN 2 EXAMINATION

RESPONSE TO MATTERS AND ISSUES – MATTER 5 (HEARING SESSION 5)
ECONOMY

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

This submission comments on matters and issues raised by, and set out in, the Inspectors' Matters and Issues Agenda to cover Matter 5 (Hearing Session 5): Economy – *"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?"*

The representations are specifically related to the proposed provision of recreation / open space within the site allocation. This matter is also raised and addressed in submissionS made to Matter 9 – Site Allocations, when considering the site itself and its allocation.

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

Yours sincerely,

Geraint John
Director
Geraint John Planning Ltd.

PREFACE

This submission relates to the matters and issues raised by, and set out in, the Inspectors' Schedule of Matters, Issues and Questions to cover Matter 5: Economy – *"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?"*

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

This Submission

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

For clarity, this submission relates only to the Matters, Issues and Questions raised in relation community facilities and open space, in particular questions 17 (Policy GN 51) and 18 (Policy GN 52). The response provided below, while addressed to respond to Question 17 c, ought to be read and considered in relation to Questions 17 and 18 as a whole.

QUESTIONS

"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?"

Retail, leisure, community and tourism

Community facilities and open space

17. Policy GN 51

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?

The site (Land North of Hayston View, Johnston – ref. HSG/048/00038) has been promoted to-date to include all of the land within the site promoter's ownership, including that identified as a Recreational Open Space (ref. OSP/048/07) in the Deposit Plan, as shown below:



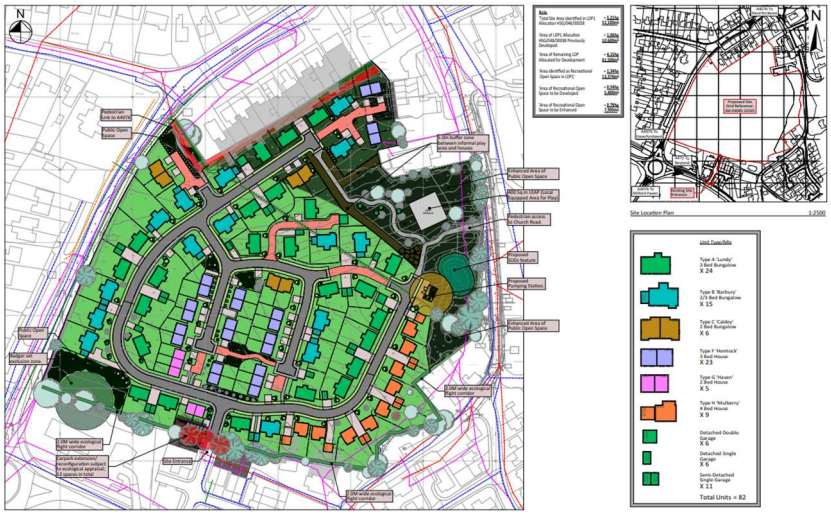
Candidate Site Register Map (site outlined in green)



Pembrokeshire County Council Deposit Plan Proposals Map

As set out within our the representants to the Deposit Plan, we object to the inclusion of the Recreational Open Space parcel – which sits within the candidate site boundary, albeit outside of the defined residential allocation (ref. HSG/048/00038).

This designation is a proposed designation, as opposed to reflecting or representing any existing functioning open space. The designation in the Proposals Map, and accordingly the Plan's approach for new open space, effectively is to 'create' open space. It is considered equally apt and appropriate for the proposed housing allocation scheme to achieve and bring about this provision – indeed necessary, as there is a significant risk of it not being delivered, and / or subsequently maintained if designated and provided separately to the proposed development. The site plan submitted in support of the candidate site (and considered as part of its inclusion / allocation within the Deposit Plan) includes this land as an integral part of the overall scheme - shown for 12no. units, as well as an 'Enhanced Area of Public Open Space', SuDS, and LEAP. An extract of the plan can be seen below for reference:



Site Plan

As can be seen and noted, the indicative layout proposed is substantially consistent with, and mirrors, the Plan detail and designation – albeit differs slightly. Flexibility to accommodate this is accordingly considered appropriate and necessary.

In terms of the quantum and level of provision, whichever option or approach is followed, the area of Recreational Open Space currently proposed for allocation amounts to 1.34ha in the Deposit Plan, whereas the proposal for the whole site includes an overall provision of 1.33ha – therefore, representing a -0.01ha difference. There will be no difference in this level of provision accordingly.

Notwithstanding this, and as set out within the representation made in respect to the Deposit Plan, this parcel of land if included within the developable area will result in 12no. properties, as well as other key elements of the scheme. These would need to be located elsewhere should the Recreational Open Space be retained in the present form. This would, in turn, result in the loss of further units across the site to accommodate these requirements, impacting the overall delivery of the site and its yield.

Given the immaterial difference in open space between the two options – as per the allocation in the Deposit Plan, or integrated within the proposed development, it is considered that it is entirely appropriate and necessary for the whole site to be allocated under / through site allocation ref. HSG/048/00038, and for open space to be integrated into the site accordingly. This will also ensure that a placemaking-led scheme is achieved at the site, in accordance with both national and local planning policies, whilst also enhancing (as opposed to diminishing) the delivery and implementation (creation) of the desired recreation open space. In its current form and terms, the Plan pre-defines a placemaking approach to the site – which should be best left to the development management stage of the process. This will facilitate a / the optimum configuration once all factors, constraints, and opportunities are applied and a scheme confirmed.

As set out, this will enhance, as opposed to diminish, the prospects of delivery of the desired space and facility / resource.

Conclusion

In summary, it is considered that the open space provision that is proposed through allocation ref. OSP/048/07 can be more aptly and appropriately delivered through the proposed housing allocation scheme – which would bring about further benefits beyond that of the open space provision.

Overall, it is considered that for the reasons set out above, and those set out within the representations made to date, there will be no difference in the overall level of provision of open space. As such, the option with the greatest flexibility ought to be provided to ensure the delivery of the site and its yield, and the desired recreation open space, are maximised – which is of course the option that would allow for the provision to be delivered through the proposed housing allocation scheme.