Pembrokeshire County Council

Local Development Plan (2017-2033)

Session 6a

December 1st 2026, 10:00am

Transport, energy, minerals and waste

Hearing Statement

Statements must be received by 12 noon on 23 October 2026

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 6a – Transport, energy, minerals and waste **1st December 2026, 10:00am**	
Issue: Does the Plan provide a framework for the management of transport, energy and minerals and waste that is soundly based, justified and consistent with the requirements of national policy?	
Transport	
1. Do Policies SP20 and GN 36 provide a clear and consistent framework for the integration and coordination of sustainable transport measures and land use planning?	BS(SH)
Closed **LPA Response:** 1. Policy SP 20 Transport Infrastructure and Accessibility is a strategic policy recording support for improvements to transport infrastructure which will increase accessibility to employment, services and facilities and emphasising those proposals that do so by sustainable means. There is a cross-reference to policy GN 36 – Transport Routes and Improvements, which identifies various proposals for improvements to transport infrastructure that are safeguarded by the Plan. A further element of this strategic policy is to record support for pedestrian and cycleway schemes coming forward in conjunction with the Active Travel (Wales) Act, 2013. Many Active Travel proposals can happen without the need to secure planning permission, but where such permission is required, the principle is supported by LDP2. Policy GN 36 The first element sets out criteria to be satisfied when improvements to the transport network (listed as new or improved major and minor roads, rail network improvements, cycleways, multi-use / shared-use paths, sites for park and ride schemes and roadside service areas) are proposed. The second element safeguards transport routes and improvements that will be safeguarded from development that would be likely to prejudice their implementation. Four such schemes are listed, three of which are public transport interchanges (one of which has recently been completed), with the other being a road and footway improvement proposal in Pembroke. The Council is of the view that these policies, in tandem, provide a clear and consistent framework for the integration and co-ordination of sustainable transport measures and land use planning. The Council notes that the schemes safeguarded by policy GN 36 need to be programmed, funded and likely to be implemented in the Plan period. Other transport proposals, at an earlier stage of development, have not been safeguarded because they do not currently satisfy those requirements. Integration and co-ordination of land use and transportation proposals is also linked to the provisions of policy GN 2 – Sustainable Design, as explained in the reasoned justification to SP 20.	
2. Does the Plan take advantage of opportunities to implement planned active travel routes?	BS(SH)

Closed **LPA Response:** 2. Policy SP 20 – Transport Infrastructure and Accessibility says that pedestrian and cycleway schemes coming forward in conjunction with the Active Travel (Wales) Act, 2013, will be supported. Many elements of the Active Travel proposals in Pembrokeshire do not require planning permission, but on the occasions that they do, the principle is supported by LDP 2. Some proposals that are integral to the roll-out of Active Travel (particularly the public transport interchanges) are additionally supported by safeguarding, as set out in policy GN 36. Updated Planning Obligations Supplementary Planning Guidance is being prepared which will include requirements for contributions for planned active travel routes and links to them from allocated and windfall development sites.	
3. How will the provision of vehicle and cycle parking be managed through the Plan?	BS(SH)
Closed **LPA Response:** 3. Appendix 3 to LDP2 proposes the preparation of Parking Standards and ULEV Charging Points Supplementary Planning Guidance, linking this to LDP2 policies GN 1 – General Development Policy and GN 2 – Sustainable Design. The Development Plans team has had preliminary discussions with transport colleagues on updating the Parking Standards for LDP2. It is understood that the South West Wales Corporate Joint Committee is currently preparing regional Parking Standards and these will be adapted to meet the LDP2 SPG requirement for this topic area. Previous Parking Standards have not referred to ULEV Charging Points, but this will be rectified for the LDP2 SPG.	
Energy	
4. Does the Plan's evidence base provide a robust basis to inform the development of renewable and low carbon energy policies, having regard to national planning policy?	TN(BS)
Closed **LPA Response:** 4. The evidence base is primarily the Renewable Energy Assessment (REA) (SD29.1-3)[1] c and the Annual Monitoring Reports. The REA is based on the Renewable Energy Toolkit[2] and provides a robust technical assessment of renewable and low carbon energy resources within Pembrokeshire and is adequate to support renewable energy policy as a baseline. The report found that Pembrokeshire can make contributions to the renewable energy targets particularly through solar, biomass and building integrated sources. Although the REA does predate Future Wales 2040, the pre-assessed wind areas and the current Planning Policy Wales, the replacement Local Development Plan does accord with these national polices and takes national policy changes into account.	

[1] https://www.pembrokeshire.gov.uk/objview.asp?object_id=3261&language= SD29.1
https://www.pembrokeshire.gov.uk/objview.asp?object_id=3262&language= SD29.2
https://www.pembrokeshire.gov.uk/objview.asp?object_id=3263&language= SD29.3
[2] Local development plans: guidance on renewable and low carbon energy | GOV.WALES

5. Policy GN 4 a. Is Policy GN 4's aims to minimise resource demand, improve efficiency and optimise energy use consistent with PPW paras 5.8.4-5.8.5? b. Are the policy's aims sufficiently clear and effective? c. Is the reasoned justification at paras 5.38 to 5.42 relevant to the policy?	
Closed **LPA Response:** 5a. With regard to Planning Policy Wales paragraph 5.8.5 (SD80)[3], Building Regulations [4] are being updated to improve energy efficiency in the near future. With the rate of change in recent years regarding new regulations, this makes developing local standards difficult. In addition, there is not significant headroom for additional costs in Pembrokeshire's Local Development Plan provisions due to viability issues. The viability margin for additional costs in the planning authority area is extremely limited and although the building regulation changes are taken into account in the viability testing, it was considered that any further costs would impact significantly on other priorities for the Plan such as affordable housing. More recent issues with nutrient mitigation is an added concern. In terms of Planning Policy Wales 12 paragraph 5.8.4 (SD80) it is suggested that, if the Inspector considers this is an appropriate way forward, paragraph 5.43 of the Local Development Plan 2 could be amended to advise; in accordance with national planning policy; that applications for major development will be required to submit an independent energy report which will include energy efficiency and renewable energy recommendations. The application also needs to contain the developers' response to the report. 5b/c Reformatting is needed to make the aims of Policy GN4 and Policy GN 5 clearer. It is suggested that the bold policy text of Policy GN 5 be inserted at the beginning of Policy GN 4. The GN 5 target and allocations will form the first part of the policy followed by the aspects concerning resource efficiency. The reasoned justification from both polices will then follow to support the combined policy. Officers can prepare a Matters Arising Change if the Inspector considers this to be an appropriate way forward.	
6. Policy GN 5 a. Have the allocations in Policy GN 5 appropriately considered site constraints, including best and most versatile agricultural land and peat? b. Do the site hectarages reflect this? c. Is there any conflict between both solar allocations and adjacent residential allocations? d. How has the annual target of 9 MW been informed by assumptions relating to potential installed capacity on identified sites and Brawdy Airfield? Should the target be more ambitious?	TN(BS)

[3] Planning Policy Wales - Edition 12 SD80
[4] https://www.gov.wales/approved-document-l-conservation-fuel-and-power

Closed **LPA Response:** 6a. The site constraints have been considered for both allocations included in Policy GN 5. Neither site contains any peat according to the Peatlands of Wales map[5]. Both sites do contain best and most versatile agricultural land. The Llanstadwell site is 75% Grade 2 (remaining area 25% is 3b) and the Wolfscastle Site is 100% Grade 2. (See Agricultural land classification Part 2 2024 Background Paper (SD50.2)[6]. The Council is extremely limited in terms of the candidate sites coming forward for renewable energy and the Plan area as whole is constrained by best and most versatile land. These two allocations are owned by the Local Authority and whilst being small sites, are allocated as a contribution towards renewable energy goals. 6b Both allocations are small (Wolfscastle: 1.55Ha and Llandstadwell: 0.68Ha) and do not cross the thresholds laid out in the "Best and most versatile agricultural land and solar PV arrays" Dear CPO letter[7]. Although small they will provide a contribution to renewable energy in the county. 6c Both the solar and neighbouring housing allocations will require careful design and landscaping to avoid such conflicts with amenity concerns. 6d The 9MW target is based on the renewable energy applications permitted [8] of 6MW and an increased contribution from allocations and the Brawdy site. The most recent Annual Monitoring Report increases the 3-year average to 9.4MW. The target could be increased, however, given the uncertainty around the Brawdy site, the relatively small scale of the solar allocations and county wide constraints such as best and most versatile land and landscape impact a conservative estimate would seem appropriate.	
7. Policy GN 6 a. Have the allocations followed a robust site assessment process? b. Is the reference to "local policies" in Policy GN 6 sufficiently clear? c. Should the policy provide support to appropriate renewable energy proposals, inline with Future Wales?	BS (TN)
Closed **LPA Response:** 7a. The Pre-Assessed Areas for Wind Energy are defined by Future Wales – The National Plan 2040 (SD67)[9] and an element of Pre-Assessed Area 8 extends into the easternmost part of Pembrokeshire. Future Wales advises that *'In the 'Pre-Assessed Areas for Wind Energy' (see Map on page 94) the Welsh Government has undertaken an assessment to identify these areas to provide certainty where, in principle, developments would be acceptable. In these areas there is a presumption in favour of large-scale on-shore wind energy development and the associated landscape change*	

[5] Welsh Peatland Data Portal
[6] https://www.pembrokeshire.gov.uk/objview.asp?object_id=11617&language= SD50.2
[7] https://www.gov.wales/sites/default/files/publications/2022-08/best-and-most-versatile-agricultural-land-and-solar-pv-arrays.pdf
[8] Implementation and Monitoring - Pembrokeshire County Council
[9] Future Wales: The National Plan 2040 SD67

subject to the criteria in policy 18. Outside of these areas a positive policy framework still exists, subject to policy 18.' Hence, the site assessment process in relation to the Pre-Assessed Areas for Wind Energy has been carried out by Welsh Government rather than by the Council. 7b. As explained in Policy GN 6 and its reasoned justification, the purpose of the policy is to ensure that policies and proposals in LDP2 (local policies) and the decisions made on planning applications (through the Council's development management function) do not prejudice the implementation of the Future Wales (SD67) policies and proposals for the Pre-assessed Areas for Wind Energy. As such, the policy aim of LDP2 policy GN 6 is to support the provisions of Future Wales in this policy area by ensuring that they are not compromised by decisions made on other proposals within the defined Pre-assessed Area. The Council would welcome any suggestions from the Inspector on how additional clarity might be provided in the policy wording. 7c. The policy position on the Pre-Assessed Areas for Wind Turbines in Wales is already set out in Future Wales – the National Plan 2040 (SD67). Future Wales has Development Plan status and there is clear policy and spatial definition for the Pre-Assessed Areas. The amendment of Policy GN 6 to express support for what is already in Future Wales would therefore duplicate what already exists. It is the Council's view that this is not necessary. To note: Due to a representation received in Focussed Changes Consultation an amendment is proposed to the final paragraph of the reasoned justification of Policy GN 6. As laid out in Chapter 6 - Schedule of Representations (SD09.7)[10] . Representor number FC 1507 Welsh Government. See Appendix A Part 1 Policy Edits Matters Arising Changes for further details.	
Minerals and waste	TN (BS)
8. Do Policies SP18, GN 37, GN 38, GN 39 and GN 40 provide an appropriate framework for the management of mineral resources in Pembrokeshire, and are they consistent with national planning policy?	
Closed **LPA Response:** 8 Yes, these policies provide an appropriate framework and accord with national policy including: ▪ Maintaining aggregate landbanks; ▪ Contributing to regional aggregate supply; ▪ Safeguarding mineral resources from sterilisation; ▪ Safeguarding marine aggregate infrastructure; ▪ Supporting recycled and secondary aggregates; ▪ Protecting mineral operations through buffer zones; ▪ Supporting collaboration across the West Wales sub-region.	

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

8a. What is the latest position with the Statement of Sub-Regional Collaboration on minerals for the west Wales region (SD52.2[11])? What are the implications for the Plan?	
Closed **LPA Response:** 8a. The Statement of Sub-Regional Collaboration based on the provisions of the Regional Technical Statement 2nd Review has not yet been completed. Collaborative working has continued however, and this is reflected in the sand and gravel allocation and areas of search which will contribute towards the sub-regional need in West Wales.	
8b. Is the sand and gravel allocation (MN/000/LDP2/001 Trefigin Quarry extension) justified, proportionate and deliverable?	
Closed **LPA Response:** 8b As set out in Policy GN 37 supporting text paragraphs 5.206 -5.208 and the Addendum Minerals Background Paper 2024 (SD52.2)[12] page 9 paragraph D the RTS 2nd review has identified the need for a sand and gravel allocations in Pembrokeshire County Council planning area. The long term intention is to remove mineral production from the Pembrokeshire Coast National Park. For hard rock the existing land bank in the rest of Pembrokeshire is sufficient to cover the increased need. For sand and gravel there is no current production outside of the National Park in Pembrokeshire. The allocation is made to contribute towards the sub-regional need. The site has been submitted by an existing operator in the region and is effectively an extension of an existing site which is currently within the Pembrokeshire Coast National Park, but with the proposed extension being into a non-National Park location. The site is deliverable and will meet a proportion of the overall need for sand and gravel in the region.	
8c. Are the areas of search for sand and gravel under Policy GN 37 justified?	
Closed **LPA Response:** 8c. Due to the sub-regional need for sand and gravel production as laid out above and in Addendum Minerals Background Paper 2024 (SD52.2[8]) page 9 paragraph F the RTS 2nd review has identified the need for a sand and gravel area of search in Pembrokeshire County Council planning area. See text below: *"Given the availability of unworked crushed rock and sand & gravel resources in Pembrokeshire County Council's planning area, and the longer-term ambition to reduce quarrying activity within the National Park, there would be merit in identifying new Areas of Search (even if specific allocations are not required) in order to encourage future interest from mineral operators."* The Area of Search has been produced in collaboration with the British Geological Society category 1 sand and gravel resource mapping with appropriate buffer distances to settlement boundaries. This provides a robust evidence base for the policy.	

[11] https://www.pembrokeshire.gov.uk/objview.asp?object_id=11504&language= SD52.2
[12] https://www.pembrokeshire.gov.uk/objview.asp?object_id=11504&language= SD52.2

8d. Are the safeguarded areas of minerals in Policy GN 38 justified? Do these areas include minerals related infrastructure (PPW 5.14.7)?	
Closed **LPA Response:** 8d The basis for Minerals safeguarding is laid out in PPW 12[13] SD80 paragraph 5.14.7-5.14.9 the safeguarded areas are based on BGS mapping 2012 mineral safeguarding maps for hard rock and sand and gravel. A wharf used for sand and gravel in Pembroke Dock is also safeguarded on the Proposals Map.	
8e. Is the meaning of 'sensitive development' clear in Policy GN 38?	
Closed **LPA Response:** 8e. The term 'sensitive development' in Policy GN 40 can be clarified in the reasoned justification. Is this the intended policy reference? A definition can be taken from Minerals Technical Advice Note (MTAN) Wales 1 Aggregates (SD70) [14] *"Sensitive development is any building occupied by people on a regular basis and includes housing areas, hostels, meeting places, schools and hospitals where an acceptable standard of amenity should be expected. Sensitive development could also include specialised high technology industrial development where operational needs require high standards of amenity."* Please see Appendix A Part 1 Policy Edits Matters Arising Change [c] for the proposed edit.	
f. Does Policy GN 40 provide clarity on its scope? Should it include a list of relevant minerals sites shown on the Proposals Map?	
Closed **LPA Response:** 8f. The supportive text along with the addition of a definition of a sensitive development provide greater clarity for the policy. A list of quarry buffers can be provided in the supportive text alongside proposals map if this would provide greater clarity.	
9. Do Policies SP 21, GN 59 and GN 60 provide an appropriate framework for sustainable waste management in Pembrokeshire, and are they consistent with national planning policy? a. How have the sites listed in Policy GN 59 been identified? Should they be added to the Proposals Map?	TN (BS)
Closed **LPA Response:** 9. These policies provide an appropriate and robust framework for sustainable waste management in Pembrokeshire and are consistent with Planning Policy Wales edition 12 and TAN21: Waste. The policies reflect the key principles of national policy by prioritising waste prevention, promoting reuse, recycling and recovery in accordance with the waste hierarchy, supporting the proximity principle, facilitating the provision of necessary waste management infrastructure, and treating disposal to land as a last resort. The reasoned justification of Policy GN 59 can be amended to require a waste planning assessment to accord with TAN21. Please see Appendix A [c] Part 1 Policy Edits	

[13] Planning Policy Wales - Edition 12 SD80
[14] https://www.gov.wales/minerals-technical-advice-note-mtan-wales-1-aggregates SD70

	for the proposed edit. Proposed addition to reasoned justification of Policy GN 59: 5.341a As stated in TAN 21 a Waste Planning Assessment will be required to be submitted with all applications for a waste facility classified as a disposal, recovery or recycling facility. Please see Chapter 4 and Annex B of TAN 21 for further details.	
9a.	The sites listed in GN 59 are potentially suitable for the provision of new in-building facilities for the handling and treatment of waste. These are general employment sites / major industrial areas that the Council considers appropriate for that type of use where they were considered not to have adverse impacts on amenity. A number already host waste processing facilities. As TAN21 advises *"many modern in-building facilities externally appear similar to any other industrial building and internally contain industrial processes or energy generation that may be no different to other modern industrial activities in terms of their operation or impact"*. It adds that *'many general employment sites and major industrial areas are likely to be suitable locations for waste facilities but this will depend on a variety of local factors, including the nature of existing users and the strategy adopted for particular employment sites."* These sites are shown on the Proposals Map but could potentially have a waste identifier (reference to Policy 59) added to highlight the link to this policy. Please see Appendix A Part 1 Policies for the proposed edit. Matters Arising Change [6] . Please also see Appendix A Part 3 Proposals Map [6] to this Hearing Statement which illustrates the Proposals Map edits required.	