Pembrokeshire County Council

Local Development Plan (2017-2033)

Session 6b

Tuesday 1st December 2026, 10:00am

Development Management policies and monitoring

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 6b – Development Management policies and monitoring Tuesday 1st December, 10:00am	
Issue: Are the Plan's policies for the management of the built, historic and natural environment, rural development and infrastructure provision soundly based, justified and consistent with national planning policy?	
Development management policies	
1. Policy GN 1:	
a. Is criterion 1 clear and precise?	
Closed **LPA Response:** Q1a. The Council's view is that criterion 1 is clear and precise. Nonetheless, its interpretation when considering planning applications will require an element of officer judgement.	BS(TN)
b. Should criterion 1 also refer to effects on "appearance" as well as character? Should it refer to "use"? Is the double reference to "location" necessary?	
Closed **LPA Response:** Q1b. The Council would not have a problem with the insertion of a reference to 'appearance' in criterion 1 but suggests that this matter is dealt with by policy GN 2, criterion 2, which refers to good design, an element of which is appearance. The Council does not consider that the criterion needs to be amended by referring to 'use' as this is more appropriately captured in the more detailed policies of the Plan which prescribe where uses should go. However, the reference to 'located' at the end of criterion 1 should be substituted by the word 'situated' to avoid duplication. This suggested amendment can be found in Appendix A Part 1 Policy Edits Matters Arising Changes c to the hearing statement.	
c. Is the reference to "local amenity" in criteria 2A and 2B clear and proportionate? Should it refer only to "residential amenity"?	
Closed **LPA Response:** Q1c. Criteria 2A and 2B refer to different aspects of local amenity. The splitting of criterion 2 of LDP 2, Deposit Plan 2 was put forward in response to representations received earlier in the Plan process. The Council is not of the view that these criteria should refer to 'residential amenity' alone, as the matters under consideration might need to be considered in other local contexts as well, for example tourist accommodation, schools, and workplaces.	
d. Is criterion 6 clear and precise about avoiding harm to the safety of	

highway users?	
Closed **LPA Response:** Q1d. Criterion 6 already refers to detrimental impact on highway safety and to highway capacity. While the Council would not object to additional reference being made to avoiding harm to the safety of highway users, it considers that as currently worded, the criterion already implicitly covers this.	
e. Is the reference to "(a harmful impact that cannot be satisfactorily mitigated)" necessary?	
Closed **LPA Response:** Q1e. This wording has been included to provide definitional clarity on the meaning of 'an unacceptable adverse effect'. The Council does not see a need for deleting this reference.	
f. How would criterion 10 be applied? Does it duplicate criteria 2A and 2B?	
Closed **LPA Response:** Q1f. Criterion 2A considers impacts of loss of light on local amenity. Criterion 2B is more general and references light impacts on local amenity. Criterion 10 looks at light pollution generated by development proposals and requires their mitigation. On reflection, the Council considers that the reference to light in criterion 2B duplicates the provisions of criterion 10. Therefore, a Matters Arising Change [c] is proposed to remove the reference to 'light' in criterion 2B, on the basis that criterion 10 provides a more detailed consideration of the same matter. This can be found in Appendix A Part 1 Policy Edits to the hearing statement. Criterion 10 requires proposals careful consideration of the necessity of lighting and amount of lighting given the potential impacts on biodiversity, local amenity and the character of the local area. Wherever lighting is necessary, justification will be needed to ensure that provision is minimised. The Council employs staff with specialist knowledge in this field who can advise Development Management staff on what is needed in this regard.	
g. Is criterion 12 duplicating Green Wedge controls? Should there be reference to harm?	
Closed **LPA Response:** Q1g. Green Wedges, as provided for in LDP 2 policy GN 48, restrict development on land located between urban settlements (towns) and other nearby settlement(s). The locations concerned have been defined by LDP 2 and the use of this policy will help to maintain the distinct identities of separate communities. Criterion 12 of GN 1 does not define specific areas but seeks to avoid the coalescence of distinct settlements (and notably, doesn't require	

one of the settlements to be a town). It also seeks to avoid consolidation of ribbon development. In this case, paragraph 5.18 of the reasoned justification to GN 1 refers to protecting the distinctive nature of settlements and to avoiding the encroachment of development into countryside areas. Coalescence of distinct settlements and creation / consolidation of ribbon development are considered to be inherently detrimental to the character of the built environment. This is already implicit in the approach taken by LDP 2. The Council will however include a reference to 'harm' if the Inspector deems this to be necessary.	
2. How will the Plan apply the principles of sustainable placemaking contained in Policy GN2?	
Closed **LPA Response:** 2. The principles of sustainable placemaking are embedded in LDP 2 policy GN 2. This policy refers to good design, local character, landscape / townscape context, ensuring designs are resource efficient and climate responsive, collection and recycling of waste, flexible and adaptive design, creation of an inclusive and accessible environment, provision of good quality public realm, inclusion of well-designed outdoor space, and provision of ULEV charging points. For its three largest residential allocations, the Council is proposing a masterplanned approach to development, as set out in policies GN 18 (Slade Lane, Haverfordwest), GN19A (Masegwynne, Fishguard) and GN19B (South of Conway Drive, Castle Pill Road, Steynton, Milford Haven). The Council is also intending to produce a Residential Design Guide to support Local Development Plan policies and a Development Sites and Infrastructure Supplementary Planning Guidance to support the implementation of this policy. The Council will expect developers to apply sustainable placemaking principles to their planning applications and the Council's planning officers will check to ensure that this has been done in their evaluation of individual proposals at application stage.	
a. Does criterion 2 duplicate provisions in Policy GN1 criterion 1?	
Closed **LPA Response:** Q2a. Policy GN 2 specifically embeds sustainable design and placemaking into LDP 2. There is an element of overlap between criterion 2 of GN 2 and criterion 1 of GN 1, but GN 2, criterion 2, provides more detail, as indeed it should. The provisions of GN 1, are helpful in ensuring an inclusive approach to all key matters relating to development proposals within a single policy, so while the Council is not overly concerned if there is an element of duplication, it will heed any further advice that the Inspector provides on this particular matter.	
b. Are the circular economy principles in criterion 3 justified?	
Closed	

LPA Response: 2.b Circular economy principles aim to keep materials, products and components in use for as long as possible. To do this, Planning Policy Wales edition 12 (SD80[1]) suggests moving from a make, use, dispose approach to one based on re-use, repair and recycling. It is an approach that reduces unnecessary waste and its principles should be incorporated into design choices, into site selection and into construction practices. As such, its inclusion in criterion 3 of LDP 2 policy GN 2 on Sustainable Design and Placemaking seems entirely appropriate. A Matters Arising Change to policy GN 2, relating to the circular economy, has previously been proposed, in response to Focussed Changes representations relating to this matter (FC4409/5, FC4394/1, FC4410/5 and FC4480/1). The details of the proposed Matters Arising Change can be found in Appendix A Part 1 Policy Edits.	
c. Is criterion 9 clear on the standards being applied for ultra-low emission vehicle charging points?	
Closed **LPA Response:** Q2b. The Council will require provision to be made for ULEV charging points where new residential development is proposed. It will also require such provision on commercial developments in appropriate circumstances. Paragraph 5.25 (policy GN 2 reasoned justification) elaborates on the circumstances in which ULEV charging points might be required on non-residential proposals, referring to PPW edition 12, which recommends a minimum of 10% of parking spaces on non-residential developments should provide a ULEV charging point (SD80[2]). Further advice on this matter will be included in Supplementary Planning Guidance on Parking Standards and ULEV Charging Points. Regional Parking Standards are currently being prepared by the SW Wales CJC and will provide a foundation for the Council's SPG document on the same topic.	BS(TN)
3. How do the Plan's general and design policies consider access, inclusivity and the needs of different user groups in development proposals?	LC (LW)
Closed **LPA Response:** The Council consider that the Plan integrates accessibility, inclusivity, and the needs of different user groups by embedding these considerations as core principles within its policies, ensuring they apply to all development types and scales. SP 1 Creating Sustainable Places requires consideration is given to accessibility to services and refers further to SP 6 Settlement Hierarchy – A Sustainable Settlement Strategy and GN 1 General Development Policy. SP 8 Regional Growth Areas and Urban Settlements requires that development prioritises accessibility by a range of sustainable modes of transport.	

[1] https://www.gov.wales/planning-policy-wales SD80
[2] https://www.gov.wales/planning-policy-wales SD80

SP 20 Transport Infrastructure and Accessibility requires that improvements to the existing transport infrastructure that will increase accessibility to employment, services and facilities, particularly by sustainable means, will be supported. GN 1 General Development Policy supports development where it would take place in an accessible location, would incorporate sustainable transport and accessibility principles and would not result in a detrimental impact on highway safety or in traffic exceeding the capacity of the highway network. Inclusivity is further strengthened through the Plan's commitment to social equity and community cohesion. Policies require development to consider the needs of families, older people, disabled people, children, and vulnerable groups. This is reflected in expectations for mixed-tenure housing, adaptable and lifetime homes, accessible green spaces, and safe, inclusive play and recreation areas. The Plan also supports active travel infrastructure that is designed for all users, including wheelchair users, cyclists of varying abilities, and those with sensory impairments. The Plan aligns with national policy requirements in Planning Policy Wales and Future Wales, ensuring that inclusive design is embedded from the outset of masterplanning of sites. This will be supplemented by SPGs and design codes that will provide guidance on implementing inclusive design principles in specific contexts. The requirement for design and access statements ensures that applicants must explicitly demonstrate how accessibility and inclusivity have shaped their proposals. This creates a transparent, accountable process that ensures that the needs of diverse user groups are considered throughout the design process. Furthermore, Transport Assessments will be required for proposals likely to generate significant additional journeys, to demonstrate that sustainable transport and accessibility principles have been built into the development, including provision of cycle parking and 'set-down' areas for buses.	
4. Is the wording of Policy GN 28 consistent with relevant heritage statutory duties and national policy? a. Is the policy locally distinct or does it duplicate national planning policy? b. Paragraph 5.155 references a potential register of Historic Assets of Special Local Importance. Would Policy GN 28 provide an appropriate level of protection to such assets?	LC (SH)
Closed **LPA Response:** 4. and 4a. and 4b. Policy GN 28 is considered to provide a suitable and reasonable local response to the guidance and intentions set out in national policy. Policy GN 28 seeks to protect, conserve, promote and enhance the historic environment as a resource for the general well-being of present and future generations.	

Reference is made to both the Historic Environment (Wales) Act 2023 (which includes the new measures for the positive management of change in the historic environment introduced under the 2016 Act) and Technical Advice Note 24: The Historic Environment (SD103)[3] (a suite of guidance and advice that complements the Act's objectives). Both will form a key consideration in the determination of planning applications affecting assets within Pembrokeshire. The reasoned justification sets out in detail the significance of the historic environment in Pembrokeshire. TAN24 (SD103)[4] states that supplementary planning guidance linked to such policies is a material consideration in the planning process and can provide an effective tool for the management of historic assets of special local interest. It is acknowledged that local distinction would also be rooted in the register of Historic Assets of Special Local Importance when it is created. The Historic Environment (Wales) Act 2023(Part 6) and PPW outline a requirement for the compilation, adoption and maintenance of an up-to-date and publicly accessible Historic Environment Record (HER), which provides details of all the historic assets in individual local planning authority areas. As part of the HER, local planning authorities can include details of buildings which are not subject to any statutory protection but are historic assets of special local interest that make an important contribution to the character and appearance of the area. Guidance in relation to the designation of local heritage assets is contained in 'Managing Lists of Historic Assets of Special Local Interest in Wales' (2017).[5] The document sets out the process of preparing a list of historic assets of special local interest and makes clear that only once a list has been formally adopted, can it be used as evidence to support the inclusion of policies in development plans. The process of preparing the element of the HER that related to Historic Assets of Special Local Interest has not yet to commence, and, as such, no list had been formally adopted. In the absence of an adopted list paragraph 5.155 of the LDP advises: *The Council will seek to create and adopt a register of Historic Assets of Special Local Interest to support the inclusion of policies in the Local Development Plan at review stage.* Policy GN 28 as written does not provide a policy context to protect such assets.	
5. Policy GN 48: a. Are the green wedge designations necessary and consistent with national planning policy? b. Does the green wedge evidence (SD48 and ED14) assessment provide a robust and credible basis for identifying and defining the extent of each designation? c. What is their justification over and above the policy framework	LC (SH)

[3] https://www.gov.wales/technical-advice-note-tan-24-historic-environment (SD103)
[4] https://www.gov.wales/technical-advice-note-tan-24-historic-environment (SD103)
[5] https://cadw.gov.wales/sites/default/files/2019-05/Managing%20Lists%20of%20Historic%20Assets%20of%20Special%20Local%20Interest%20in%20Wales%20EN.pdf

restricting development in the countryside?	
Closed **LPA Response:** 5 a to c. Policy GN 48 aims to identify and protect vulnerable areas from inappropriate development, as defined in national policy, with development proposals determined in accordance with PPW Edition 12 (SD80)[6] (2021) paragraphs 3.64-3.78. The policies set out in LDP 2, in line with national planning policy, allow for numerous types of development to be permitted outside Centre boundaries, including employment uses, tourism and exceptional land releases for affordable housing. Therefore, the Green Wedge designation has been applied in locations where there has been pressure for development and there is additional need to protect the landscape. The justification for Green Wedges in the Plan can be found in SD48[7] Green Wedge 2019 Background Paper and ED14[8] Green Wedge Background Paper Feb 2026.	
6. Does Policy GN 49 provide an appropriate mechanism for managing the impact of development on the characteristics and qualities of Pembrokeshire's landscapes? a. Is it based on robust and credible evidence?	TN(SH)
Closed **LPA Response:** 6 Yes, Policy GN 49 alongside Policy GN 1 provide an appropriate and effective mechanism for managing the impacts of development on landscape character, consistent with Planning Policy Wales Edition 12[9]. SPG will be available for the policy as stated in LDP2 GN 49 reasoned justification paragraph 5.282: "The Landscape Character Assessment (SD21)[10] for the Plan area has been prepared as Supplementary Planning Guidance to the 2013 LDP and this will be rolled forward following the adoption of LDP 2. The SPG will, once adopted, form a material consideration for the consideration of development proposals, alongside any topic specific sensitivity study or guidance." 6a The policies are based on Planning Policy Wales edition 12(SD80)[11]. The Landscape Character Assessment is based on LANDMAP data as described in the Overview section of Landscape Character Assessment - May 2022 (SD21)[12]	

[6] https://www.gov.wales/planning-policy-wales (SD80)
[7] https://www.pembrokeshire.gov.uk/objview.asp?object_id=7667&language= SD48
[8] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12299&language= ED14
[9] https://www.gov.wales/planning-policy-wales SD80
[10] https://www.pembrokeshire.gov.uk/adopted-local-development-plan/ldp-supplementary-planning-guidance SD21

[11] https://www.gov.wales/planning-policy-wales (SD80)
[12] https://www.pembrokeshire.gov.uk/adopted-local-development-plan/ldp-supplementary-planning-guidance SD21

7. Does Policy GN 14 provide an appropriate framework for assessing proposals for replacement dwellings in the countryside? a. Is criterion 2 clear in its aims, including a building of local vernacular character?	MD
Closed **LPA Response:** 7. The framework proposed is considered to be appropriate in so far as it sets out the terms under which replacement dwellings would be considered acceptable in a countryside location. Applicants are encouraged to consider the intrinsic qualities of the natural and built environment prior to considering full replacement and where full replacement is appropriate to pursue high-quality, proportionate designs that respect building and landscape character, ensuring that new developments are sympathetic to their environment. 7a.Planning Policy Wales (Edition 12 February 2024) (SD80)[13] Paragraph 6.0.2 "The special and unique characteristics and intrinsic qualities of the natural and built environment must be protected in their own right, for historic, scenic, aesthetic and nature conservation reasons. These give places their unique identity and distinctiveness and provide for cultural experiences and healthy lifestyles." TAN 12 (SD93)[14] Design 5.8.1 "The special qualities of the rural landscape and coastline of Wales should be recognized. The qualities should be enhanced through conservation of the character of the countryside and by achieving quality in new development." Criterion 2 aims to reflect this national planning policy and technical advice note.	
8. Does Policy GN 33 provide an appropriate framework for assessing farm diversification proposals? a. Is it consistent with other Plan policies on retail and visitor accommodation?	MD
Closed **LPA Response:** 8. The policy framework is consistent with paragraph 3.75 of Planning Policy Wales Edition 12(SD80)[15] and paragraphs 5.6.12 to 5.6.13 Small rural diversification schemes can also contribute to the viability of a community by providing a focus for community life and hubs of economic activity. 5.6.13 Diversification activities come in many forms and include both agricultural and non-agricultural activities. Technical Advice Note 6 'Sustainable Rural Communities' (SD89)[16] Section 3.7 'Farm Diversification' is also applicable and the policy wording is consistent with this section of the Technical Advice Note. In terms of Q 8a the Council needs to consider vitality and viability issues for neighbouring village shops. (paragraph 3.8.2 of the Technical Advice Note 6 (SD89)[17] under 'Farm Shops' asks this of the LPA). Policy GN 33 Farm	

[13] https://www.gov.wales/planning-policy-wales (SD80)
[14] https://www.gov.wales/technical-advice-note-tan-12-design (SD93)
[15] https://www.gov.wales/planning-policy-wales (SD80)
[16] https://www.gov.wales/technical-advice-note-tan-6-planning-sustainable-rural-communities (SD89)
[17] https://www.gov.wales/technical-advice-note-tan-6-planning-sustainable-rural-communities (SD89)

Diversification alongside Policies GN 56 Caravan and Camping and Policy 58 Self Catering Accommodation would allow for linked proposals to be brought forward although new build self-catering is not permitted. Technical Advice Note 6 (SD89)[18] refers to 3.6 'Holiday conversions' but Section 3.7 of the Technical Advice Note does generally not explicitly promote this type of use when types of development linked to farm diversification are referred to. Technical Advice Note 13 (SD94)[19] Tourism acknowledges the role of caravan and camping development in the countryside – paragraph 12.	
9. Are the requirements of Policy GN 34 concerning the use of traditional buildings in the countryside appropriate and consistent with national planning policy and guidance? a. Given the policy title and scope, should criterion 2a also apply to employment proposals? b. How are 'extensive alteration, expansion or rebuilding' defined?	MD
Closed **LPA Response:** Q9. Yes Policy GN 34 Conversion... of Traditional Buildings… is considered to be appropriate and consistent with national planning policy and Technical Advice Notes with specific reference to Technical Advice Note 6 (SD89)[20] and 23 (SD102)[21]. Paragraph 5.181 of the policy's reasoned justification explains why the Council has not sought to priortise employment over residential uses in conversions. 9.a With regard to question 9a the Council has in formatting the Policy title and wording unfortunately lost the rationale for having a different policy approach in part 1 as opposed to part 2 of the policy. The first reference to 'Traditional' in the policy title should be deleted to reflect the intention of the policy to allow the conversion of rural buildings more generally for employment purposes as referenced in Technical Advice Note 23(SD102)[22] '*3.2.1:The re-use and adaptation of existing rural buildings has an important role in meeting the needs of rural areas for commercial and industrial development, and tourism, sport and recreation'* Other referencing within the policy wording and the reasoned justification also requires editing. Please see Appendix A Part 1 Policy Edits for the proposed Matters Arising Change [c]. Residential conversions need to be confined to those buildings of a traditional character. Paragraph 3.3.2 of Technical Advice Note 23(SD102)[23] advises *'Residential conversion of rural buildings which have ceased to be used for industrial or commercial purposes, including agriculture, need to be assessed on their impact including their impact on the fabric and character of historic buildings.'* Paragraph 3.2.3 advises that *'If the existing building is unsuitable for conversion without extensive alteration, rebuilding or*	

[18] https://www.gov.wales/technical-advice-note-tan-6-planning-sustainable-rural-communities (SD89)
[19] https://www.gov.wales/technical-advice-note-tan-13-tourism (SD94)
[20] Technical advice note (TAN) 6: planning for sustainable rural communities | GOV.WALES SD89
[21] Technical advice note (TAN) 23: economic development | GOV.WALES SD102
[22] Technical advice note (TAN) 23: economic development | GOV.WALES SD102
[23] Technical advice note (TAN) 23: economic development | GOV.WALES SD102

extension, or if the creation of a residential curtilage would have a harmful effect on the character of the countryside, the same considerations relating to new house building in the open countryside will apply'. 9b. In answer to Q 9b. this would be a planning judgement on a case-by-case basis taking account of the structural soundness of the building (usually with the benefit of structural survey), the extent of the proposed changes and alterations to be building.	
Infrastructure	
10. Is the Council's evidence sufficiently clear and robust in identifying the infrastructure required to deliver the Plan? a. Does the Implementation Plan (ED10d[24]) sufficiently address the provision in the Development Plans Manual to prepare an Infrastructure Plan? b. Have its requirements been included in accompanying viability evidence to support delivery of the Plan? c. Is there sufficient certainty that infrastructure can be delivered in line with anticipated timescales for site delivery, including the housing trajectory?	SH
Closed **LPA Response:** 10. All of the sites allocated for development in LDP2 have been subject to consultation with various departments within the Council and Key Organisations to identify the infrastructure needed for delivery and to address any constraints and necessary mitigation. This evidence for the Key Housing Sites is set out in the Implementation Appendix (Ref ED10d[25]) with similar sheets having been prepared for all sites and which will form a Development Sites Supplementary Planning Guidance document. 10a. Document ED10d[7] is an Implementation Appendix, required by paragraphs 5.127 and 5.128 of the Development Plans Manual. The information provided follows the example of the table included in the Manual. The Infrastructure Plan, required by paragraphs 5.125 and 5.126 of the Manual will be delivered by the publication of the Development Sites SPG mentioned in the response to question 10 above and will provide detailed information for each site. 10b. The Implementation Index (Doc ref ED10d[7]) has been taken fully into account in the Viability Report update (Doc ref ED10a)[26]. 10c. All of the sites allocated for development in LDP2 have been subject to consultation with various departments within the Council and Key Organisations to identify the infrastructure needed for delivery and to address any constraints and necessary mitigation. It is considered that sites can be delivered to their anticipated timescale and in line with the housing trajectory.	
	SH and BS
11. Does Policy GN 3 provide a clear and appropriate mechanism for securing new infrastructure from development?	

[24] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12286&language= ED10d
[25] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12286&language= ED10d
[26] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12283&language= ED10a

Closed **LPA Response:** 11. Yes. Policy GN 3 (Infrastructure and New Development) sets out the requirement for development to fund necessary infrastructure and the types of provision for which contributions will be sought.	
a. Is the policy clear on how and when planning obligations will be secured?	
Closed **LPA Response:** 11a. Criterion 2 of the Policy refers to the use of planning obligations to secure contributions. Supplementary Planning Guidance will be published to provide detail on how and when contributions are required.	
b. Does the requirement for gigabit capable broadband duplicate controls in building regulations?	
Closed **LPA Response:** 11.b GN 3 Infrastructure and New Development applies to all developments. However, there is a recently introduced provision in the Building Regulations Wales that relates specifically to new dwellings in Wales. The Building Regulation requirement is that new build homes in Wales must include gigabit-ready physical infrastructure and a gigabit-capable broadband connection, under the Building etc. (Amendment) (Wales) Regulations 2025. The amended Regulations came into effect on 01/07/25. There are two key requirements: ▪ Physical Infrastructure – RA1 – Developers must install gigabit-ready underground ducting, chambers, and termination points in all new residential and mixed-use dwellings; ▪ and Network Connection – RA2 – each new home must be provided with a gigabit-capable connection (delivering download speeds of at least 1000Mbps). The Council's understanding is that this provision does not extend to other building types, such as schools, hotels and commercial buildings. Hence, the answer to the question is that there is partial duplication, specifically relating to new dwellings, and this is cost capped. Officers can provide suggested amendments to the wording of the policy to exclude reference to those elements that are already covered by building regulations if this is considered appropriate.	
c. Is it appropriate to identify this as a second priority?	
Closed **LPA Response:** 11.c It is appropriate to indicate priorities for contributions in Local Development Plans, or in related SPG, and in this case the Council has used LDP 2 policy GN 3 to do this. The Council has indicated that its top priority in this regard is for affordable housing provision, with	

gigabit-capable internet through broadband being the second priority. That is its choice and there doesn't seem to be any Welsh guidance to suggest that such a choice is in any way inappropriate.	
d. Should the reference to mains connections in paragraph 5.32 feature in the policy?	
Closed **LPA Response:** 11.d As the Inspector notes, the ability to connect to a main sewer (where available) is referenced in paragraph 5.32 and the use of planning conditions alone to ensure that this happens is stated to not be adequate on its own – with the implication being that a developer contribution will also be needed, as this paragraph is in reasoned justification to policy GN 3, which specifically discusses developer contributions. The Council has investigated this matter and notes that developers have a statutory right and responsibility under the Water Industry Act, 1991, to carry out and pay for direct connections to a mains sewer, through the water undertaker (the water company). These connections are the direct responsibility of the developer and are linked to a statutory right to connect. Essentially, this is a matter for the developer to resolve with the water company. Funding for standard utility connections should not be moved into local authority developer contribution systems (such as section 106 legal agreements), as the latter have been put in place to mitigate wider infrastructure impacts (such as for roads, schools or open space provision) rather than to finance a utility provider's operational duties. In that context, it is considered that the last two sentences of paragraph 5.32 (reasoned justification to policy GN 3) should be deleted through a Matters Arising Change, as they should not be included in the reasoned justification to this policy (as mains sewer connections should not be funded through s.106 developer contributions) and the content is, in any case, partially incorrect. This can be found in Appendix A Part 1 Policy Edits Matters Arising Change c to the hearing statement. (For clarity, it is appropriate for a Local Planning Authority to use planning conditions, including Grampian conditions, to delay occupation until off-site network reinforcements or wider infrastructure upgrades are implemented).	
e. Should Welsh language infrastructure be added to the policy, given para 4.132?	
Closed 11.e Agree – paragraph 4.132 refers to section 106 contributions to support Welsh Language communities, but there is no specific reference to this in the contributions list in GN 3. The Council suggests that this matter should be added to item 5 on the list of matters that might require contributions, so that it refers to Community and Cultural Facilities,	

including libraries, community halls **and measures to support Welsh Language communities**. A Matters Arising Change is therefore proposed to that effect. This can be found in Appendix A Part 1 Policy Edits to the hearing statement. Matters Arising Change [c] The Council is also of the view that an amendment to sentence 4 of paragraph 5.32 of the reasoned justification to GN 3 is needed, likewise referring to measures to support Welsh Language communities. This can also be found in Appendix A Part 1 Policy Edits Matters Arising Change [c] to the hearing statement.	
12. Policy GN 27 a. How would the first paragraph be implemented? b. Does the second paragraph duplicate controls in building regulations? c. In the third paragraph, what happens if an applicant is unsuccessful in obtaining responses from providers?	BS
Closed **LPA Response:** 12.a The Council already does this. There has been and will continue to be liaison between specialist staff employed by the Council and telecommunications service providers on this matter. A catalyst for this has often been the provision of modern broadband services to Pembrokeshire schools and in some cases the investment required to achieve this opens new opportunities for others as well. There has also been contact between the Development Plans staff and service providers in conjunction with plan preparation. 12.b Please see the answer to Session 7, question 11.b, which discusses this matter. There is partial duplication, specifically relating to new dwellings. 12.c The Council is of the view that this scenario would be very unlikely to arise. If, however, there was no response from providers, the Council would assume that the requirements of the policy could not be met at that location and that an exception would need to be made. However, it would be reasonable to ask for evidence to show that an attempt had been made to establish contact with providers.	
Natural environment	
13. Does Policy SP 12 provide a clear and consistent framework for maintaining and enhancing the natural environment? a. Is it consistent with national policy, including Planning Policy Wales (PPW) paragraphs 6.4.15 and 6.4.25? b. Is it clear, precise and capable of being implemented consistently? c. Is it consistent with Policy GN 41?	TN (MD)
Closed **LPA Response:** 13 Yes. SP12 does provide a clear framework for maintaining and enhancing the natural environment. ▪ It is consistent with national policy and PPW 12 (SD80) [27] paragraphs 6.4.15-6.4.25, particularly the step-wise biodiversity approach, biodiversity net benefit requirements and protection of designated sites.	

[27] https://www.gov.wales/planning-policy-wales SD80

a. It is sufficiently clear and capable of consistent implementation when read alongside other plan polices in particular GN 41 to GN 45. b. It is consistent with GN 41 on the Protection of National Statutory Environmental Designations.	
14. Is Policy GN 41 locally distinct or does it replicate the provisions of national planning policy? a. Is it sufficiently clear how Policy GN 41 would be applied to development outside the boundaries of protected sites? b. Is the policy clear in its terminology, including sites of European importance?	TN (MD)
Closed **LPA Response:** 14 GN 41 is consistent with national planning policies and provides a local framework for the policy which is a significant matter for Pembrokeshire. There is no local justification for altering national policy. a. GN 41 has had a proposed change based on focussed changes consultation responses which clarifies the approach taken to development outside the boundaries of protected sites. The policy also states that an "appropriate zone of influence will be used to ensure that development is assessed for its likely impact on the protected features or species of the statutory protected site." b. No - the policy will be amended to ensure HRA references are only attributed to SAC, SPA and RAMSAR sites. – See Appendix A. Part 1 Policy Edits Matters Arising Change [c]	
15. Is Policy GN 42 consistent with the step-wise approach in national planning policy? a. Is the reference in the final paragraph in Policy GN 42 sufficiently flexible?	TN (MD)
Closed **LPA Response:** 15 Yes – although the policy wording doesn't explicitly reference the step-wise approach it is consistent with its meaning. 15a As laid out in Planning Policy Wales Edition 12 (SD80)[28] paragraphs 6.4.15 (1a and 1b) and 6.4.34 peatland has been identified as irreplaceable resource and of special importance. It states, "Where peat is identified within proposed developments considerable weight should be given to its protection because of its special importance in underpinning and supporting national natural resources such as soil carbon, biodiversity and flood management, and unless other significant material considerations indicate otherwise it will be necessary to refuse permission." Welsh Government provided a Deposit Plan representation regarding peat which can be found in Point 6 Section 4.1 of Appendix 4 - Issues Papers updated 23 September 2025 (SD09.5)[29] highlighting the need to consider 1a and 1b of the step-wise approach and peatlands status as a irreplaceable	

[28] https://www.gov.wales/planning-policy-wales SD80
[29] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12063&language= SD09.5

habitat. This policy paragraph has been added as a response to this representation and to reflect national policy.	
16. Is Policy GN 43 consistent with PPW para 6.4.42?	
Closed **LPA Response:** 16. GN 43 can be amended to make it more consistent with paragraph 6.6.42. Specifically with the first sentence of paragraph 6.6.42 of PPW 12[30] regarding *"…. removal of trees, woodland and hedgerow will only be permitted where it would achieve significant and clearly defined public benefits".* A Matters Arising Change is therefore proposed to that effect. This can be found in Appendix A Part 1 Policy Edits to the Hearing Statement Matters Arising Change [6]. In terms of the remainder of the Planning Policy Wales Edition 12 (SD80)[31] paragraph 6.4.42 the GN 43 policy does not explicitly reference the step-wise approach but it is consistent with it in terms of seeking to avoid and minimise damage in criterion 1, 2 and 3 and providing mitigation and compensation in criterion 4 and 8. The compensatory planting is referenced in the supporting text and refers back to Planning Policy Wales edition 12 for details on appropriate compensatory measures.	TN (MD)
17. Are the provisions of Policies GN 44 and GN 45 clearly expressed and consistent with national policy?	MD
Closed **LPA Response:** Q17. Yes. Both policies have been written to reflect national planning policy Planning Policy Wales Edition 12 (SD80)[32]. Both policies will also benefit from the development of supplementary planning guidance as set out in Appendix 3 to the Local Development Plan 2.	
18. Is the deletion of Policy GN 46 justified, having regard to Technical Advice Note 15?	SH
Closed **LPA Response:** 18. Policy GN 46 was intended to identify areas of coastal flood risk now and for the lifetime of properties and to control the type of development permitted within those identified areas. The Deposit Plan was published in advance of the updated TAN15: Development, Flooding and Coastal Erosion (SD96[33]). The previous TAN15 relied on Development Advice Maps and did not take sea-level rise into account. The revised, now current, TAN15 relies on data provided by the Flood Map for Wales which is maintained and updated by Natural Resources Wales.	

[30] https://www.gov.wales/planning-policy-wales SD80
[31] https://www.gov.wales/planning-policy-wales SD80
[32] https://www.gov.wales/planning-policy-wales SD80
[33] https://www.gov.wales/technical-advice-note-tan-15-development-flooding-and-coastal-erosion SD96

The TAN reflects the core principles of the National Strategy for Flood and Coastal Erosion Risk Management in Wales[34] which recognises the flood risk now and into the future. Policy GN 46, as drafted, has become outdated by the revised TAN15 and even with updated terminology would provide no additional provisions to those contained in the revised TAN15 (SD96[35]). It was therefore proposed for deletion.	

[34] National Strategy for Flood and Coastal Erosion Risk Management in Wales | GOV.WALES
[35] https://www.gov.wales/technical-advice-note-tan-15-development-flooding-and-coastal-erosion SD96