Pembrokeshire County Council

Local Development Plan (2017-2033)

Session 7 Site allocations – Cawdor Barracks and urban centres

Wednesday 2nd December 2026, 10:00am

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 7 – Cawdor Barracks and urban centres Wednesday 2nd December, 10:00am	
Issue: Are the allocated sites soundly based and capable of delivering new residential development over the Plan period?	
GN 7 Cawdor Barracks including the former Brawdy Airfield	BS
1. What are the constraints affecting the site, and are these constraints significant obstacles to development within the Plan period?	
Closed **LPA Response:** The main constraints affecting the site are: ▪ the continued use of parts of the site for military purposes, with further military uses continuing to emerge at the site, ▪ the requirement to follow Crichel Down Rules should site disposal be taken forward, ▪ landscape impacts, seascape impacts, potential visual impacts on the Pembrokeshire Coast National Park, individual and cumulative visual impacts of any renewable energy developments that might come forward, ▪ safeguarding requirements relating to any retained military installations on the site, ▪ its general rural location, ▪ the lack of a connection to the national rail network and the reliance on the A.487 for road access, bearing in mind in particular the issues relating to that road at nearby Newgale. ▪ There may also be nature conservation constraints on parts of the site. All these matters are a constraint to development within the Plan period and beyond but would not necessarily preclude future re-purposing of the site.	
2. In light of the constraints, and having regard to policy provisions for infrastructure including affordable housing and planning obligations, is the allocation economically viable?	
Closed **LPA Response:** The Council does not consider that policy GN 7 is an allocation. Rather, it is an indication of what future uses might potentially be acceptable on this site, should the Ministry of Defence dispose of part or all this site. To be clear, this site remains on the MoD disposal list. The delivery of the Plan's strategy is not dependent on this site being redeveloped, but as disposal remains a possibility within the Plan period the Council is of the view that having some indication of potential re-use opportunities should be a component of its replacement LDP. Regarding residential development, the housing requirements of the Plan period are not in any way dependent on the delivery of further residential development at this site. In terms of viability, the situation is currently unclear, but the indications from the 2015 consultancy study would suggest that some higher value future uses, particularly residential, would be needed	

as a component of a more complex re-use and re-development package. There was some market testing carried out in conjunction with the preparation of that study but noting that it is now 11 years old and a lot has happened since then. It is also worthwhile to mention that there are important differences between what might happen 'within the wire' (essentially the current Cawdor Barracks) and 'outside the wire' (essentially the former Brawdy Airfield).	
3. Does the evidence give sufficient certainty about the scale and type of development anticipated to come forward?	
Closed **LPA Response:** There is little certainty relating to this site at present, particularly given the recent emergence of the DARC project and the possibility that the MoD will retain ownership of part or all elements of this site. The scale and type of development suggested by this policy are more indications of what the acceptable future uses of this site might be should partial or full MoD disposal take place than a firm indication of what scale and type of development will take place. However, it is envisaged that a development brief will be prepared, with full involvement of the MoD / DIO when the position regarding potential disposal becomes clearer.	
4. Does the evidence give sufficient certainty about site delivery during the Plan period?	
Closed **LPA Response:** As noted above, there is no certainty about site delivery because the Council does not know whether the MoD will dispose of the site, in part or whole, during the Plan period. If ownership of the site by the MoD continues for the remainder of the Plan period, then there will be no delivery because continuing operational use of the site for military purposes will continue. However, as things currently stand, the site remains on the MoD's disposal list, so the Council considers that it must give an indication of potential re-use opportunities within the Plan period.	
5. What are the mechanisms and timescales for delivering the site?	
Closed **LPA Response:** The first thing that would need to happen would be disposal of the site by the MoD, in part or whole. The site is currently on the MoD disposal list, hence there is no certainty over whether ownership will be retained or not – either for part of the site or for the whole site. If disposal takes place, then there would be a need for liaison with the new owners regarding what might happen at the site and over what timescales. That might be complex and multi-faceted. However, by putting in place a policy setting out potential future uses, the Council would be assisting the current and possible future site users regarding what might be possible in terms of re-development / re-purposing at the site. Without that, disposal would be likely to be more difficult and indeed the outcome might be a	

failure to re-purpose the site.	
Closed 6. Is the site allocation essential to ensure the soundness of the Plan?	
LPA Response: As noted previously, the Council does not consider this policy to be an allocation, but rather an indication of what future uses might be possible on the different parts of this large site. The delivery of the re-development of this site is not essential to ensure the soundness of the Plan – the Plan is not reliant on delivery of new development or re-development / re-purposing at this site. However, in the Council's opinion, it is the right time to look at potential options and set these out in its replacement LDP. If the MoD retain full ownership and an operational presence on this site during the remainder of the Plan period, then there will be no need to use the policy and it will remain dormant. However, if partial or full site disposal takes place, then there would, through GN 7, be a clear indication regarding re-use possibilities on the different parts of the site. Hence, while the policy is not an essential component for Plan soundness, the Council would suggest that it is a necessary one.	
7. Would it be more appropriate to consider the site through a masterplan approach as Supplementary Planning Guidance?	
Closed **LPA Response:** The Council has suggested preparation of a Development Brief for the site, which would be able to build on the general indications of possible future land uses on the different parts of the site set out in the policy framework. A masterplan approach might well be appropriate. The Development Brief could be adopted as Supplementary Planning Guidance if there was a suitable link to a Plan policy – as indeed there would be if policy GN 7 is carried forward into the adopted Plan – and subject to public consultation on content. The Council is of the view that having the indications of potential future uses on the different parts of the site would provide a framework for that more detailed consideration. It would be best for the work on the Development Brief / SPG to be taken forward once MoD's intentions for the retention and / or sale of the site become clearer.	
GN 18 Slade Lane, Haverfordwest (S/HSG/040/LDP2/6) BS ***GN 19A Maesgwynne, Fishguard (S/HSG/034F/LDP2/1) BS*** ***GN 19B South of Conway Drive, Steynton (S/HSG/086/LDP2/3) LW***	See Across SH/AB support
1. Is the site policy supported by detailed evidence to support its delivery, including Statement(s) of Common Ground? (DPM Table 18) 2. What are the constraints affecting the site, and are these constraints significant obstacles to development within the Plan period? 3. In light of the constraints, and having regard to policy provisions for	

infrastructure including affordable housing and planning obligations, is the allocation economically viable? 4. Having regard to site-specific evidence and relevant policies for on-site infrastructure and design-related matters, are the number of dwellings proposed realistic and deliverable over the Plan period? 5. What are the mechanisms and timescales for delivering the site? 6. Is the site allocation essential to ensure the soundness of the Plan? 7. Does the policy include all essential requirements to deliver the site? 8. Does the policy contain sufficient placemaking and master planning detail?	
LPA Response: ***GN 18 Slade Lane, Haverfordwest (S/HSG/040/LDP2/6)*** Closed 1. This site is in multiple ownerships, and these ownerships have changed significantly over the course of Plan preparation. The dominant owner at the time of the main calls for Candidate Sites did not submit a Candidate Site, although had followed up the allocations of earlier plans with several planning applications, some for proposals conforming with the current LDP (adopted in 2013), others for different types of use. The key change to the ownership situation was the sale of most of the site to a) Pobl Housing Association (which has subsequently become part of the Codi Group) and b) Welsh Government prior to the publication of LDP 2, Deposit Plan 2. This constitutes a major change of circumstances, and the Council has sought to modify LDP 2 to reflect the views of these new owners. Welsh Government indicated that it would like the whole site to be allocated for residential development, with detailed master-planning to follow, to incorporate the dominant residential proposals and the related proposals for other uses, such as for the new primary school, open space and green infrastructure (including Sustainable Drainage Systems (SuDS)). For information, there are other ownerships within the site area, including Hillwest Ltd (a smaller area of land on the eastern part of the site) and Pembrokeshire County Council (for the land proposed for the new primary school, but noting that the latest plans indicate a different location for this and that a land exchange will be necessary). Pobl Housing Association (now Codi Group) is taking forward the phase 1 proposals (which have all necessary planning permissions in place) and has a (currently undetermined – in October 2026) planning application registered for its phase 2 proposals. Welsh Government has appointed Lichfields consultancy to take forward the masterplan and to prepare a further planning application, expected to cover the remaining parts of the site. Hillwest Ltd has completed several dwellings in an initial development of its separate land holding and is seeking a modest extension to this at the present time (again, October 2026).	

The PCC school site landholding is not in the preferred location for the new school shown on the emerging site masterplan, so a land swap, possibly with a financial adjustment, will need to take place to reflect the latest proposals.

As well as the work that PCC has prepared on a site file for this large allocation (included in document ED12e[1]), Lichfields has made substantial progress in preparing the site masterplan, including running their own public consultation on a draft version.

To allow the proper consideration of what level of affordable housing should be provided at this site, a key site viability appraisal has been prepared for the part of the site in Welsh Government ownership, the findings of which will be reflected by LDP 2.

A statement of common ground (SoCG) between PCC and Lichfields (acting on behalf of Welsh Government) has been discussed, relating primarily to the part of the site in Welsh Government ownership (this element being referred to as Maes Slade). The details of discussions to date form Appendix B Statement of Common Ground to this response. This provides clarity for some key matters relating to this site, including the affordable housing expectations (reflecting the multiple ownerships) and the potential impacts on viability of the current Natural Resources Wales nutrient neutrality requirements for dissolved inorganic nitrogen.

PCC and Lichfields (acting for Welsh Government) have agreed to a 30% affordable housing provision for the Maes Slade element of the site. It is acknowledged that nutrient neutrality requirements may reduce the 30% figure and there is detail included in Appendix B Statement of Common Ground which elaborates on this aspect. In one of the emails appended, Lichfields (on behalf of Welsh Government) has suggested that delivery on Maes Slade will commence in 2030, the reasons behind which PCC understands and accepts, but to note that the latest version of the LDP 2 Housing Components and Trajectory (ED34)[2] anticipates an earlier start.

2. The constraints affecting this large site are summarised in the site file for this large allocation (which forms a part of document ED12e). This is the largest residential allocation proposed by the Plan and will also include other, related, land uses, including a new primary school, open space and green infrastructure (including SuDS). The key constraints and requirements are summarised as follows:
   - Requirement for a new primary school to meet the needs generated by the development. However, no education contribution towards secondary school education is needed.
   - Nutrient neutrality required for nitrogen.
   - Provision of an element of affordable housing within the site proposals, in line with the outcomes of the LDP 2 housing viability assessment of the site.
   - Development of the highway network within the site, including

[1] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12292&language= ED12e Housing/Residential Allocation GN 16 Settlements B-K
[2] Appendix 2 Local Development Plan 2 Housing Components & Trajectory Update Sept 26 ED34

permeability from adjacent areas of developed land and provisions to facilitate local bus services within the site. ▪ Preparation of a Transport Statement is likely to be needed, to evaluate the potential impacts on the nearby Trunk Road network in Haverfordwest (likely to be considered in conjunction with the master-planning work). ▪ Provision of an Active Travel plan, to inform the development of active travel routes within the site and linking to other parts of Haverfordwest, including the town centre. ▪ There is a need for ground investigations, to establish whether there are any contamination issues (as the site is close to a former landfill site). A Contaminated Land Risk Assessment is therefore needed. ▪ Extension of key services onto the site (which has commenced through Pobl (now Codi Group) phase 1). ▪ Safeguarding an 18" raw water main, which crosses the site. ▪ Hydraulic modelling assessment, to determine the point of connection to a mains water supply. ▪ Awareness of a mains sewer which crosses the site. ▪ A foul drainage connection to Merlins Bridge WwTW, which has limited capacity. The growth being proposed for the catchment area may require improvements which would need to be funded through the DCWW Asset Management Plan (AMP) or potentially earlier through developer contributions. ▪ Mitigation of surface water flooding within the site boundary (but noting that the site is not within a flood risk zone for fluvial or tidal flooding). ▪ There is a stream valley running through the southern part of the site, whose integrity as a watercourse and as an ecological corridor should be retained as an element of the development site. This stream ultimately discharges into the Western Cleddau river, which is protected for its nature conservation importance. ▪ Sustainable disposal of surface water through a SuDS approach. ▪ Preparation of a Green Infrastructure Assessment (in conjunction with the preparation of the site masterplan). ▪ An 11kV overhead electricity cable runs along the northern boundary of the two northernmost fields and re-enters the westernmost field. There is also a further 11kV underground cable running along the southern boundary. It is likely that new substation would be required to serve the site, due to the size of the development. ▪ The site is partially located within the Milford Haven Waterway Landscape of Outstanding Historic Interest. A Landscape Assessment is therefore needed (and is likely to be incorporated into the site masterplan). ▪ A desk-based assessment (Historic Impact Assessment) has already identified low to medium potential for archaeological remains, from several periods. An appropriately staged archaeological evaluation will be required to inform possible mitigation (a desk-based assessment has already been prepared). There is a historic building within the site requiring assessment and recording. The building concerned is in poor condition and may need to be removed (this matter is being considered in conjunction with the master-planning work).	

- As well as the vegetation in the southern stream valley, the trees and hedgerows within the site should be retained wherever possible. These act as ecological corridors to and from adjacent countryside and river corridors. The site is near a B-Line and planting for pollinators should therefore be included. There will potentially be off-site impacts on a Natura 2000 site (the Western Cleddau River corridor). An Ecology Assessment will be needed and is likely to be incorporated into the master-planning work. Screening for project-level HRA will be needed at planning application stage.
- The site represents a large extension of the built area in this part of Haverfordwest. Landscape impact and mitigation are being considered in conjunction with the master planning work at this site and will be incorporated into the site proposals (therefore, a separate Landscape Plan is not required).
- Provision of open space, specifically (for the Welsh Government land) an on-site provision of 8 x Local Areas of Play (LAPs), 4 x Local Equipped Areas of Play (LEAPs), 1 x Neighbourhood Equipped Area of Play (NEAP), plus an off-site financial contribution of £380,700.

The above list indicates a substantial number of constraints within the site, but noting that this list is not in itself exceptional for such a large site. Clearly, the requirement for nutrient neutrality for dissolved inorganic nitrogen and the associated implications for site drainage is a significant matter that will require mitigation and may affect site viability. That said, the Council is of the view that the constraints will not, individually or cumulatively, prevent a substantial amount of new development taking place in the Plan period, while noting that build-out of the whole site will not be completed until a later plan period. The Pobl Housing Association (now Codi Group) phase 1 development is now completed, and further phases of development are anticipated for later in the plan period (with the residual dwellings coming forward after 2033).

The latest version of the LDP 2 Housing Trajectory (document ED34[3]) anticipates build out of the site as follows: 487 dwellings in the Plan period, comprising 115 (completed), 66 (2027-28), 66 (2028-29), 66 (2029-30), 47 (2030-31), 61 (2031-32), 33 (2032-33), 33 (2033 residual) and 312 (beyond the Plan period (giving a grand total of 799). A Matters Arising Change will be needed to bring LDP 2 into line with these figures, if agreed during Examination. As noted earlier, Lichfields (on behalf of Welsh Government) has also indicated that it considers that construction of Maes Slade will commence in 2030, the reasons behind which the Council understands and accepts. This would require a further amendment to the Trajectory shown in ED34.

3. The site is economically viable to deliver, even given the range of constraints and the challenges arising from the current requirement for nutrient neutrality for dissolved inorganic nitrogen. A key site viability appraisal has been prepared (see documents ED10a [4](Addendum / Update to the 2024 Financial Viability Report) and ED10c [5](Appendix B –

[3] Appendix 2 Local Development Plan 2 Housing Components & Trajectory Update Sept 26 ED34
[4] Financial Viability Report Addendum Feb 2026 ED10a
[5] Appendix B Updated Key Site FVAs ED10c

Updated Viability Assessments for 'Key Sites'), both from February 2026), the conclusion of which is that, for affordable housing, 30% will be possible for the part of the site in Welsh Government ownership. The Statement of Common Ground prepared jointly by PCC and Lichfields consultancy (on behalf of Welsh Government), Appendix B, elaborates on this matter and provides further detailed information regarding the potential impacts of nutrient neutrality for nitrogen requirements on site viability and therefore affordable housing delivery.

The affordable housing provision aspects relating to the Slade Lane allocation have some complexities, because of the multiple ownerships involved. Hence, while the affordable housing element for the Welsh Government owned element of the site is at 30%, for the parts of the site already built out and proposed to be built out by Pobl Housing Association (now Codi Group) there are higher figures. Pobl phase 1 has delivered 115 dwellings, of which 42 were affordable dwellings (36.5%), while Pobl phase 2 is expected to deliver 103 dwellings, of which 58 will be affordable dwellings (56%), although the planning application relating to this is yet to be determined (in October 2026). The part of the site in Hillwest Ltd ownership is much smaller but will also need to be taken into consideration in assessing the overall position.

4. The number of dwellings proposed are realistic and deliverable over the Plan period, but with the important caveat that a Matters Arising Change would be needed (if agreed) to bring LDP 2 into line with the conclusions from the Key Site Viability Appraisal for the site (see documents ED10a and ED10c, referenced in the response to question 3), the latest version of the LDP 2 Housing Components and Trajectory (document ED34[6]), which reflects the Key Site Viability Appraisal conclusions and any other related matters requiring Plan changes agreed during the Examination Hearings. The starting point will be the revised figures agreed by Savills (acting on behalf of Lichfields, agents for Welsh Government) and Andrew Burrows of Burrows Hutchinson Ltd (the Council's viability consultant).

   In terms of the delivery and overall site totals for the Plan period and beyond, the main conclusions arising from those changes are that the overall site total will fall, but the expected delivery within the Plan period is likely to increase.

   Based on the Key Site Housing Viability Assessment for Maes Slade, the new figures are 487 dwellings within the Plan period (to the end of 2033) with a further 312 dwellings after 2033, giving a site total of 799. That compares with the position reached at LDP 2 Focussed Change stage, which anticipated 330 dwellings within the Plan period and a further 680 dwellings after 2033, giving a site total of 1010. However, as advised above there will be further discussion in relation to the details of the trajectory during the Examination Hearing sessions.

   The master-planning work on the site has indicated that the net

[6] Appendix 2 Local Development Plan 2 Housing Components & Trajectory Update Sept 26 ED34

developable area of the site will be rather less than was previously indicated, hence the loss of 211 dwellings from the previous site total. 5. The delivery mechanism is not known at this time. It is highly likely that Codi Group (formerly Pobl) phase 2 will be taken forward by the housing association, but the mechanism for delivery of the Welsh Government land is currently less clear and may involve other parties. Notwithstanding the above, with the development of the residential elements of the site now being taken forward by Codi Group (formerly Pobl Housing Association) (with Pobl phase 1 completed) and Welsh Government, and work on a masterplan for the whole site by Lichfields consultancy (on behalf of Welsh Government) now well advanced (and a further planning application expected soon), the expectation is that build-out of the site will continue over the coming years. As noted above, the master-planning work on the site, the preparation of a key site viability appraisal for the part of the site in Welsh Government ownership and the updated housing trajectory have, between them, somewhat modified the expectations regarding what this site is expected to deliver - and there may well be further debate on the delivery details. A Matters Arising Change will be made to reflect the latest thinking on this, probably best prepared following the Hearing sessions. As noted in the answers to questions 2 and 4, the Council notes that 115 dwellings are already completed (Codi Group / Pobl phase 1), with anticipated construction of the remaining dwellings being: 66 (2027-28), 66 (2028-29), 66 (2029-30), 47 (2030-31), 61 (2031-32), 33 (2032-33), 33 (2033 residual) and 312 (beyond the Plan period (giving an overall total of 799). Also, as noted above, the Council anticipates further discussions around the details in relation to expected delivery dates. 6. This site will contribute significantly towards the delivery of the housing targets of the Plan. It is the largest residential allocation in LDP 2 and proposes a significant extension to Haverfordwest, which is Pembrokeshire's County Town. As such, it is the Council's view that the allocation of the site is essential to ensuring the soundness of the Plan, as it forms a key element of the sustainable settlement strategy for the Plan area. There is no comparable alternative to this site in either Haverfordwest or more generally in Mid Pembrokeshire. It is important both in a localised context, providing for future housing need in Haverfordwest, and in a Plan-wide context, because of the contribution that it will make to future housing provision across the Plan area. It also has the potential to contribute towards meeting housing needs arising from the roll-out of the emerging Celtic Freeport proposals, as it is only a few miles distant from the sites along the Haven Waterway. 7. Policy 18 asks for a masterplan to be delivered for this important site, anticipating that it will provide a range of types, tenures and sizes of housing on a site which might include community-led housing and self-build plots. As well as that, it is expected that the site will provide a range of different types of open space, a new primary school, associated school playing fields, other community facilities (if required), and integrated	

proposals for active and sustainable travel.

As recorded in the answer to earlier questions, sustainable drainage through a SuDS approach, including an element of nitrogen mitigation, is likely to form an element of the green infrastructure that will be included within the site, recognising that some parts of the site will be retained in undeveloped form for their conservation value.

Other elements of nitrogen mitigation are likely to be provided through off-site mitigation within the Cleddau catchment, the choices and details relating to which are still emerging.

The master-planning work is well advanced, and it is becoming clear from this that the net developable area may be less than initially anticipated. A LDP 2 Matters Arising Change to reflect the latest thinking on that matter (in terms of likely delivery numbers and timings) is proposed, with detailed drafting to follow the Hearing Sessions.

A high-quality, well-designed scheme is anticipated, which is sensitive to its setting. As will be seen from the answer to question 2 for this site, there are a lot of constraints / requirements at this site, and not all are separately listed in policy GN18. That is not untypical for a large site which is intended to provide a major urban extension. The nutrient neutrality requirements are, however, a recent issue and as noted in the answers to previous questions the requirement to mitigate nitrogen impacts may affect site viability and could require further adjustments to affordable housing delivery expectations. There are many current workstreams being taken forward by a range of organisations, including the Council, looking at this aspect, and seeking solutions.

The site file for Slade Lane, Haverfordwest provides details on essential delivery requirements (see document ED12e[7]). However, it will be the masterplan itself that adds the fine grain of detail that will be necessary to ensure a high-quality built environment outcome for the site. Site delivery may also be partly reliant on availability of Social Housing Grant, which is outside the remit of LDP 2 to provide.

8. Policy 18 sets out a proposal for a site masterplan (preparation of which by Lichfields consultancy on behalf of Welsh Government is well advanced) and lists some of the key considerations that need to be built into that masterplan, as set out in the answer to question 7. The material in the site file for Slade Lane, Haverfordwest (a component of document ED12e)[8] also contributes details of constraints and delivery requirements. It will be the masterplan itself that then brings this information together, elaborates on the key considerations and provides the finer grain of detail to guide site development.

LPA Response: GN 19A Maesgwynne, Fishguard (S/HSG/034F/LDP2/1)

[7] Housing/Residential Allocation GN 16 Settlements B-K ED12e
[8] Housing/Residential Allocation GN 16 Settlements B-K ED12e

Closed

1. There is detailed evidence to support the delivery of this site. The site was submitted to the Council as a Candidate Site (CS 335) earlier in the Plan process. That submission was accompanied by an earlier (2008) design and access statement and a 2018 supporting statement, prepared by a consultancy. The site was initially larger than the LDP 2 residential allocation and this larger site has a residential planning permission, some parts of which have been built out. The LDP 2 allocation relates to the residual, undeveloped, parts of the original site.

The planning permission requires the construction of a new roundabout from the A.40, but other options may prove to be feasible, dependent on the current views of the Trunk Road Authority.

There have been more recent discussions concerning the possibility of residential care accommodation and a health centre / clinic also being provided within the site area. The Council has not ruled these out but would need to be satisfied that they would not adversely affect the town centre, bearing in mind the town centre first approach followed by Welsh Government. Also, the scale of any such proposals should not have a significant impact on the delivery of new homes on the site.

2. There are several constraints affecting this site, as set out below:
   - The group of buildings at Maesgwynne Farm are Grade II listed – these are located outside but adjoining the residential allocation, so care must be taken to protect their setting.
   - The planning permission for an earlier phase of development, now completed and known as Parc Loktudi, included a condition that its existing access onto the A40 must be stopped up once a new roundabout and access through this allocated site is completed. This will require re-assessment as part of an updated Transport Assessment (TA) for the whole site. That TA will include an assessment of whether a roundabout is now considered to be needed at the site entrance – and if not, what alternative highway access arrangement will be required. Active travel links should also be fully investigated in the updated TA, one element of which will be to consider whether a link from the development to an existing Public Right of Way to the north is possible.
   - There may be contamination issues on the site and a risk assessment of this is therefore needed.
   - A hydraulic modelling assessment (HMA) will be required to determine the point of connection to the water supply network and to the public sewerage system – and the developer will be expected to fund these investigations during the pre-planning stages. The findings of the HMA will inform the extent of any necessary upgrades. However, it has been confirmed that the public sewerage network and Fishguard Wastewater Treatment Works can accommodate the foul water flows from this site.
   - There is a gas sub-station within the site. Also, an 11kv substation is located within the adjoining housing estate known as Parc Loktudi (which was an element of the original site and is now largely built out). Further infrastructure may be required to serve the number of units

within the site allocated by LDP 2. ▪ There is a small watercourse at the western edge of the site and there are springs within its boundary. However, the site is not within a fluvial or tidal flood zone. There is a small risk of surface water flooding along the south-western boundary of the site and along / close to the lane running east to west through the site (Maesgwynne Road), which can be seen on NRW's Flood Map for Planning. The sustainable disposal of surface water as part of a SuDS approach is required at this site. ▪ The site is in a Welsh language sensitive area. Hence, phased release of the allocation may be required, together with bilingual signage and if necessary other Welsh language-related mitigation measures. A Welsh language assessment will be needed. ▪ The site is of importance from a nature conservation perspective. A tree preservation order (TPO) protects the trees within the hedgerow that divides the two northern fields, and these must be preserved. Hedgerows surrounding the site must be retained. The site lies within a B-Line. Badgers may be present within the site. There are opportunities to create landscape connectivity through the strengthening of the Eastern boundary. NRW advises that Pembrokeshire bat sites SAC surveys will be required. There will possibly need to be a need for a Test for Likely Significant Effects and potentially therefore also an Appropriate Assessment to meet Habitats Regulations Assessment requirements. ▪ Almost all of the site is Grade 3a agricultural land, but there is an overriding need for this development and there are no available / suitable alternative sites of this size in the Fishguard area. ▪ This proposal would result in a major extension of the built area in this part of Fishguard and as such will require a Landscape Study with recommendations for landscape impact mitigation measures. ▪ Education contributions are likely to be required for both primary and secondary schools. ▪ Affordable housing will be provided on site at the 10% rate. As the site is being taken forward by a Housing Association, the suggested affordable housing provision might be exceeded. At LDP Focussed Changes stage, the Plan proposed 175 dwellings within the Plan period, including 17 affordable dwellings, and a further 167 dwellings beyond the Plan period. The updated Housing Components and Trajectory (base date April 2026)[9] (ED34) requested by the Inspector shows 138 dwellings for delivery in the Plan period and a further 204 beyond the Plan period. ▪ Additional open space provision will be required at this edge of town site. On site provision of 5 Local Areas of Play (LAPs) and 2 Local Equipped Areas of Play (LEAPs) is needed. Minimum area each 0.04ha. Also required is one MUGA, minimum area 0.08ha. An off-site financial contribution to the Playground at Lota Park, Fishguard, will also be needed. This calculation is based on the number of houses anticipated for delivery during the Plan period. Future phases will require additional recreational open space provision.	

[9] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12420&language= ED34 Appendix 2 Local Development Plan 2 Housing Components & Trajectory Update Sept 26

- Other requirements will be for a Green Infrastructure Assessment, an Historic Impact Assessment, an Historic Impact pre-determination evaluation, an Archaeological Evaluation and an Arboriculture Report.

The Council has asked for a detailed masterplan for this residential allocation – see LDP 2 policy 19A.

3. The Council is of the view that the site is economically viable, despite the identified constraints. This site does not have a Key Site Viability Appraisal as it is being taken forward by a Housing Association. The Council is relying on previous viability assessment work under planning application 14/0070/PA where 10% affordable housing was required. However, as the site is being taken forward by a Housing Association, this figure may eventually be higher – the expectation that the site might be able to deliver 40% or more affordable housing. It is worth mentioning that as well as the largely completed element of the original site, at Parc Loktudi, a further recently completed element west of Clos-y-Bigney, taken forward by a Housing Association, has provided 50 affordable dwellings.

4. The number of dwellings proposed by LDP 2 for this site is realistic and deliverable. As noted in the response to previous questions, the original site area was larger and earlier phases of the same development are now largely completed (Parc Loktudi and West of Clos-y-Bigney sites). The LDP 2 allocation relates to the residual parts of the site. Highway access issues have previously held up the development of further phases of this site, but these matters should be resolvable. The involvement of a Housing Association is helpful and there is a possibility that future funding through Social Housing Grant will facilitate development, although that will be a matter for future decisions.

   The possibility of residential care accommodation and a health centre / clinic being provided on this site has been mooted and may also assist with site delivery.

   This site has the potential to provide a significant residential development in the northern part of the County, where few if any suitable sites of similar scale are available. For the LDP 2 residential allocation, it is envisaged that development will commence in 2028-29, with a build-out of 23 dwellings per annum through to the end of the Plan period in 2033. There is potential for a further 204 dwellings beyond the Plan period (after 2033). (See document ED34[10] – Housing Components and Trajectory Update). The modified delivery figures if agreed during Examination would require a Matters Arising Change to be made to the Plan.

   Although on this large site there are several constraints and infrastructure issues to address, the Council considers that these should not prevent this site being developed in accordance with the anticipated time frame. Also, to note, the element of the development for delivery beyond the Plan period would be likely to require adjustment if residential care accommodation and / or a health centre / clinic is provided on the site.

[10] Appendix 2 Local Development Plan 2 Housing Components & Trajectory Update Sept 26 ED34

5. The delivery mechanism is not known at this time. However, the landowner submitted a Candidate Site proposal early in the Plan preparation process, and this was accompanied by an earlier (2008) design and access statement. The site is now being taken forward by Wales and West Housing Association, represented by Asbri Planning, hence the design and access details may in due course be modified. At LDP 2, Deposit Plan 2 stage, representations were received, asking for a higher delivery rate than the Council had indicated but supporting the proposed master-planning of the site. The Housing Association wishes to move ahead with the development quickly, subject to negotiations on site purchase and the site's inclusion in the adopted version of LDP 2. The Council is anticipating build-out of the allocation commencing in 2028/29, at a rate of 23 dwellings per annum. If that is achieved, then a further 204 dwellings would follow, after 2033. It is important to note that the Housing Association anticipates a faster build-out rate. If the suggested residential care accommodation and / or health centre / clinic come forward on this site, then the housing delivery expectations would need to be modified accordingly. 6. This site will contribute significantly towards the delivery of the housing targets of the Plan. It is the second-largest residential allocation in LDP 2. As such, it is the Council's view that the allocation of the site is essential to ensuring the soundness of the Plan. There is no comparable alternative to this site in the north of Pembrokeshire. It is important both in a localised context, providing for future housing need in Fishguard, and in a Plan-wide context, because of the contribution that it will make to future housing provision across the Plan area. 7. Policy 19A asks for a masterplan to be delivered for this important site, providing for residential development, public and amenity open space, sustainable drainage systems (SuDS), a buffer zone adjacent to the listed Maesgwynne Farm complex, areas to be protected for their nature conservation value and sustainable access proposals according with the requirements of the Trunk Road Authority (site access) and best practice on the internal highway network. A high-quality, well-designed scheme is anticipated, which is sensitive to its setting. Proposals for residential care accommodation and / or for a health centre / clinic within the site area will also be considered, their acceptability being subject to detailed consideration of conformity with Welsh Government policy on accessibility of services and to their being no significant adverse effect on the capacity of the site to deliver new homes. As will be seen from the answer to question 2 for this site, there are constraints / requirements at this site not all of which are separately listed in policy GN19A. The site file for Maesgwynne, Fishguard also provides details on essential delivery requirements (see document ED12e[11]). However, it will be the masterplan itself that adds the fine grain of detail that will be necessary to ensure a high-quality built environment outcome for the site. Site delivery is also likely to be partly reliant on availability of Social	

[11] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12292&language= ED12e

Housing Grant, which is outside the remit of LDP 2 to provide. 8. Policy 19A sets out a proposal for a site masterplan and lists some of the key considerations that need to be built into that masterplan, as set out in the answer to question 7. The material in the site file for Maesgwynne (a component of document ED12e[12]) also contributes details of constraints and delivery requirements. It will be the masterplan itself that then brings this information together, elaborates on the key considerations and provides the finer grain of detail to guide site development.	
LPA Response: ***GN 19B South of Conway Drive, Steynton (S/HSG/086/LDP2/3)*** **Closed** GN 19B South of Conway Drive, Steynton (S/HSG/086/LDP2/3) 1. There is detailed evidence to support the delivery of this site. Early in the plan process, the site was submitted to the Council as a Candidate Site (CS 193), with a site concept plan, indicative site layout and transport statement submitted in support of its allocation. As a candidate site, CS 193 was subject to a rigorous Candidate Site assessment.[13] At Deposit stage, Highlight Planning (4263) submitted further supportive material on behalf of the site promoters (Owens, 34657). A detailed masterplan is required to ensure pedestrian and cycling connectivity with the previous developments in the area. The site promoters support the inclusion of the site in Local Development Plan 2 as a strategic housing allocation and have communicated with the Council regarding its delivery. 2. The principal constraints are: ▪ Transport impacts on the A4076 Steynton Road, Thornton Road and Neyland Road junction, requiring a Transport Assessment and consultation with the Welsh Government Transport Division and South Wales Trunk Road Agency. ▪ Provision of at least two vehicular access points. ▪ Requirement for a Hydraulic Modelling Assessment and any consequential sewerage upgrades. ▪ Surface water management through Sustainable Drainage Systems (SuDS). ▪ Protection of ponds, woodland and ecological corridors adjoining the site. ▪ Potential impacts on the Pembrokeshire Marine SAC, including the need for Habitat Regulations Assessment screening. ▪ Archaeological potential requiring pre-determination evaluation. ▪ Landscape impacts associated with a major urban extension. ▪ Diversion or undergrounding of two overhead 11kV electricity lines crossing the site. ▪ Delivery of substantial active travel and recreational infrastructure. The Local Highways Authority has advised that the site will require at least two vehicular access points to ensure that emergency vehicles can	LW

[12] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12292&language= ED12e
[13] Candidate site register and site assessment - settlements M-N SD08.4

always access the site. It is recommended that these are from Castle Pill Road (west of the site) and from the Neyland Road (north of the site) via Beaconing Drive, St Peter's Way and Hilton View. PCC Highways envisage that within the masterplan layout for the site, the quantum of traffic can be determined for each access point.

The need for an entrance to the north through the site previously known as Beaconing Fields drew objection from the site's developers at Deposit Stage (GJP Planning (4358) submitted on behalf of L Greggain & Co (34550)).

The latest approved site layout plans for LDP 1 allocation HSG/086/00129 show two roads to be built close to the boundary of proposed allocation S/HSG/086/LDP2/5 (plan ref. R386 P-01 N Proposed Site Plan of 22/0546/NM), L Greggain & Co own a ransom strip between their site boundary and the allocation to the south. This has been considered in the viability testing of the site (ED10c14).

Whilst these constraints are significant, they are typical of a strategic greenfield urban extension and have identifiable mitigation measures. None appear to represent an insurmountable barrier to development during the Plan period.

3. The available evidence suggests that the allocation is economically viable. The policy requirement for affordable housing is 15.4%, which reflects viability considerations for development in this market area (ED10[15] a and ED10c[16]). Although the site must accommodate substantial infrastructure provision, including active travel routes, open space, education contributions, highway improvements and ecological mitigation, these requirements are proportionate to the scale and strategic importance of the allocation. There is no evidence within the allocation assessment that viability concerns would prevent delivery of the site.

4. The allocation proposes delivery of 117 dwellings during the Plan period and a further 163 dwellings beyond the Plan period, giving a total capacity of approximately 280 dwellings.

The site extends an existing residential area in the Regional Growth Area of Milford Haven. The site is expected to yield completions from 2030-31. The site currently lies outside of Milford Haven settlement boundary in LDP1, and the site promoters are eager to start the planning application processes following the adoption of LDP2. The requirement for a detailed masterplan should ensure that development capacity is coordinated with infrastructure, green infrastructure, recreation and environmental mitigation. On this basis the proposed dwelling numbers appear realistic and deliverable.

[14] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12285&language= ED10c
[15] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12283&language= ED10a
[16] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12285&language= ED10c

5. The delivery mechanism is not known at this time. However, the landowner submitted a Candidate Site proposal early in the Plan preparation process, and this was accompanied by an indicative site layout, a conceptual plan for the site and a transport statement. The site owner has communicated with the Council regarding seeking pre-application advice under Local Development Plan 1. It is understood that the landowners have held off from progressing the site's development as the site is currently located outside of the settlement boundary in LDP1. At LDP 2, Deposit Plan 2 stage a representation was received from Highlight Planning (4263) on behalf of the site promoters (Owens, 34657) supporting the sites inclusion and proposed master-planning for the site. The site promoters are aware of the obligations and expectations associated with the site's development, and their agent has confirmed (since ED10a was published) that they are able to deliver this site for development in accordance with the LDP 2 policies. The site is expecting to yield completions from 2030/31 (27 units in year 1 and 30 units per year from year 2 to year 4). If this is achieved, then a further 163 units would follow beyond the plan period for LDP2. The site promoters submitted a representation at LDP 2 Deposit Plan 2 stage supporting a delivery rate of 35 units per annum and for development to have started in 2025. However, the delivery of the site is reliant upon the adoption of LDP 2. 6. Yes. As a Strategic Housing Key Site delivering 117 dwellings during the Plan period and a further 163 dwellings thereafter, the allocation makes a substantial contribution to the housing requirement in Milford Haven, one of the Plan's Growth Centres. The scale of the allocation and its contribution to the overall housing trajectory mean it is an important component of the Plan's housing strategy. It is important both in a localised context, as it is Milford Haven's largest housing allocation, and in a Plan-wide context, as it contributes to the delivery of housing across the Plan area. 7. Policy GN 19B contains the key requirements necessary to facilitate delivery of the allocation and highlights the key components to be addressed in future planning applications. The policy requires preparation of a comprehensive masterplan for the site, integration with adjoining allocations and previous phases of development in Steynton, provision of recreational open space, Sustainable Drainage Systems (SuDS), ecological buffer zones, and extensive walking and cycling connections. It also identifies specific access requirements, including the provision of at least two vehicular access points and the need for access arrangements to be agreed with both the Local Highway Authority and the Trunk Road Authority. Importantly, the policy requires a Traffic Assessment to inform the level of development that can be accommodated via Castle Pill Road and the A4076 junction. These requirements address the principal site-specific infrastructure and transport considerations and provide a robust basis for	

bringing the allocation forward. Whilst several more detailed infrastructure, utility, ecological and planning obligation requirements are contained within the Site Files (ED12f[17]) and wider LDP policies, GN 19B itself includes the critical site-specific matters necessary to guide delivery of the strategic allocation. 8. Yes. Given the strategic nature of the allocation, Policy GN 19B provides an appropriate level of placemaking and master planning guidance. The policy explicitly requires a masterplan and places significant emphasis on connectivity and movement. In particular, it seeks to integrate the site with existing and proposed development in Steynton and requires pedestrian and cycle links to adjoining allocations, previous housing developments, Milford Haven town centre, local schools and other services. The policy identifies the opportunity to create a strategic east-west shared user route through the site linking Castle Pill Road and the wider Steynton area, thereby improving active travel connectivity and reducing reliance on more circuitous routes. The policy also requires the incorporation of recreational open space, SuDS infrastructure and an ecological buffer zone along the southern boundary, ensuring that environmental and green infrastructure considerations form part of the overall site design. In combination, these requirements establish clear placemaking principles relating to movement, green infrastructure, recreation and integration with surrounding communities. While detailed design matters will appropriately be addressed through the master-planning and planning application process, the policy provides sufficient strategic placemaking direction to secure a coherent and well-connected development.	
HSG/086/LDP2/1 (Land at Myrtle Meadows, Steynton) LW HSG/095/LDP2/1 (Between St Daniels Hill & Norgans Hill, Pembroke) LW HSG/095/LDP2/2 & HSG/095/LDP2/5 (South West / East of Southlands, St. Daniels Hill, Pembroke) LW HSG/088/LDP2/1 (West of Bloomfield Gardens and North of Adams Drive & Highfield Park, Narberth) SH HSG/093/00066 (East of Poppy Drive, Neyland) LW	See Across SH/AB support
1. What are the constraints affecting the site, and are these constraints significant obstacles to development within the Plan period? 2. In light of the constraints, and having regard to policy provisions for infrastructure including affordable housing and planning obligations, is the allocation economically viable? 3. Having regard to site-specific evidence and relevant policies for on-site infrastructure and design-related matters, are the number of dwellings proposed realistic and deliverable over the Plan period? 4. What are the mechanisms and timescales for delivering the site? 5. Is the site allocation essential to ensure the **soundness** of the Plan?	
Closed **LPA Response:** HSG/086/LDP2/1 (Land at Myrtle Meadows, Steynton) LW	

[17] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12293&language= ED12f

Q1
There are a limited number of constraints for the site:

- Existing overhead electricity lines cross the site and may require diversion or undergrounding;
- The site is crossed by 100mm and 250mm diameter public sewers;
- Ecological constraints arise from the adjoining woodland valley and river corridor to the south and east of the site;
- The site is in close proximity to the Pembrokeshire Marine SAC and Appropriate Assessment screening will be required;
- There is a small risk of surface-water flooding;
- A pre-determination archaeological assessment will be required.

None of these constraints are considered significant obstacles to development.

The site requirements provide for ecological buffers between the development and the woodland, river corridor and existing habitat features. Dark corridors are to be retained, and boundary trees and hedgerows protected or replaced where necessary. A bat survey and Test for Likely Significant Effects will be required to ensure there is no adverse effect on protected habitats. Existing sewers crossing the site can be accommodated through detailed site design and a Hydraulic Modelling Assessment will determine the most appropriate connection to the sewerage network. Statutory consultees have not identified any constraints that would prevent the site from coming forward during the Plan period.

Q2
The site has undergone a key site viability appraisal (see Financial Viability Report 2024 Housing (SD28)[18] and Financial Viability Report Addendum February 2026 and Appendices (ED10a-c))[19]. The site is considered viable with a range of planning obligations including active travel improvements, highway works, education contributions, sewerage infrastructure, recreational open space provision and ecological mitigation.

The allocation provides for **65 dwellings**, including **15.4% affordable housing (10 affordable dwellings)**. Planning obligations include a contribution towards primary and secondary school provision, improvements to active travel links, a transport assessment to address impacts at Steynton Crossroads, on-site open space provision, and ecological mitigation measures associated with the adjacent woodland and river corridor.
No abnormal infrastructure requirements have been identified that would prevent delivery of the allocated development. Whilst infrastructure contributions will be required, these are typical of residential developments of this scale and do not call into question the overall viability of the site.

Q3
The site is phased within **(2030-2032)**. This delivery timescale provides sufficient opportunity for the necessary infrastructure works, ecological

[18] https://www.pembrokeshire.gov.uk/objview.asp?object_id=11531&language= SD28
[19] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12283&language= ED10a
https://www.pembrokeshire.gov.uk/objview.asp?object_id=12284&language= ED10b
https://www.pembrokeshire.gov.uk/objview.asp?object_id=12285&language= ED10c
https://www.pembrokeshire.gov.uk/objview.asp?object_id=12286&language= ED10d

mitigation measures and sewerage requirements to be addressed through the development management process. The allocation is considered realistic and deliverable. Access can be achieved via the existing estate roads serving Myrtle Meadows from the A4076 Steynton Road, water supply can be provided, and any sewerage upgrades required will be informed by the Hydraulic Modelling Assessment. There are no known contamination issues, flood risk constraints are limited, and the identified ecological and archaeological requirements are capable of being addressed through planning conditions and mitigation measures. Consequently, there is no evidence that the anticipated level of development cannot be delivered within the Plan period. **Q4** The delivery mechanism is not known at this time. However, the site is in private ownership and has been promoted through the Plan preparation process. The allocation benefits from identified access opportunities and clear infrastructure requirements set out within the Implementation Appendix. The Council anticipates that development will come forward during the 2030-2032 period. The site requirements identify the necessary infrastructure and mitigation measures, and there is no evidence that land ownership, infrastructure provision or environmental constraints would prevent development from proceeding within the anticipated timeframe. **Q5** The individual site is not necessarily essential to ensure the soundness of the Plan. However, it contributes towards the delivery of both the housing and affordable housing targets. The allocation will provide **65 dwellings, including 10 affordable dwellings**, within the Milford Haven / Steynton area in a sustainable location with access to employment, services, schools and active travel opportunities. The site therefore makes an important contribution to the overall housing land supply and affordable housing provision and supports the spatial strategy of the Plan.	
Closed **LPA Response:** HSG/095/LDP2/1 (Between St Daniels Hill & Norgans Hill, Pembroke) LW **Q1** There are a limited number of constraints for the site: ▪ Existing trees, hedgerows and boundary vegetation require retention and protection where possible; ▪ Archaeological investigation will be required prior to development; ▪ Ecological surveys and mitigation measures will be required, including protected species surveys and a Test for Likely Significant Effects; ▪ The site lies within and the wastewater from the development will	

drain into the Milford Haven Inner Marine Nitrogen Sensitive Catchment; ▪ Existing sewer infrastructure crosses the site and will need to be accommodated within the layout; ▪ A Hydraulic Modelling Assessment will be required in relation to water supply infrastructure; ▪ Sustainable drainage measures will be required to manage surface water runoff. None of these constraints are considered to be significant obstacles. The public sewerage network and wastewater treatment infrastructure can accommodate the proposed development, subject to detailed design requirements. Ecological, archaeological and drainage matters are capable of being addressed through the planning application process and appropriate mitigation measures. Existing landscape features can be retained within the site design, and any water supply requirements can be addressed through the findings of the Hydraulic Modelling Assessment. Statutory consultation undertaken through the Plan preparation process has not identified any constraints that would prevent the site from coming forward during the Plan period. **Q2** The site has undergone a key site viability appraisal (see Financial Viability Report 2024 Housing (SD28)[20] and Financial Viability Report Addendum February 2026 and Appendices (ED10a-c)).[21] The site is considered viable with a range of planning obligations including highway improvements, active travel infrastructure, education contributions, ecological mitigation, sewerage infrastructure and open space provision. The allocation provides for **147 dwellings**, including **24.5% affordable housing (36 dwellings)**. Key site requirements include the provision of a right-turn lane on St Daniel's Hill, a shared user path through the site with connections to the wider active travel network, ecological mitigation, archaeological investigation, open space provision and any infrastructure improvements identified through the Hydraulic Modelling Assessment. **Q3** The site is phased for delivery during the period **2028-2033**. This provides sufficient time for ecological mitigation, archaeological investigation, nutrient neutrality requirements and any network reinforcement works identified through the Hydraulic Modelling Assessment to be addressed. There are no significant infrastructure constraints affecting the site. Vehicular access is proposed from St Daniel's Hill, including provision of a right-turn lane, whilst active travel connections will integrate the development with the wider settlement. Water supply and foul drainage can be provided, and ecological, drainage and archaeological matters are capable of being addressed through the development management process.	

[20] https://www.pembrokeshire.gov.uk/objview.asp?object_id=11531&language= SD28

[21] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12283&language= ED10a
https://www.pembrokeshire.gov.uk/objview.asp?object_id=12284&language= ED10b
https://www.pembrokeshire.gov.uk/objview.asp?object_id=12285&language= ED10c
https://www.pembrokeshire.gov.uk/objview.asp?object_id=12286&language= ED10d

There is therefore no evidence that the site will fail to come forward within the anticipated timeframe. **Q4** The delivery mechanism is not known at this time. However, the site has been promoted through the Plan preparation process and assessed as a deliverable residential allocation. The site is in private ownership and benefits from identified access arrangements and a comprehensive set of development requirements set out within the Implementation Appendix and allocation schedule ED10d.[22] There is no evidence of ownership, infrastructure or environmental constraints that would prevent development from coming forward. The Council therefore considers there to be a reasonable prospect of delivery within the Plan period. **Q5** The individual site is not necessarily essential to ensure the soundness of the Plan. However, it makes a significant contribution towards the delivery of both housing and affordable housing targets. The allocation will provide **147 dwellings, including 36 affordable dwellings**, within the main town of Pembroke. The site occupies a sustainable location with good access to schools, employment opportunities, community facilities, public transport and active travel routes. The development will therefore make an important contribution towards the implementation of the Plan's spatial strategy and the achievement of its housing and affordable housing objectives.	
Closed **LPA Response:** HSG/095/LDP2/2 & HSG/095/LDP2/5 (South West / East of Southlands, St. Daniels Hill, Pembroke) LW Q1 There are a limited number of constraints for the sites: ▪ The sites lie within and the wastewater from the development will drain into the Milford Haven Inner Marine Nitrogen Sensitive Catchment; ▪ A Hydraulic Modelling Assessment (HMA) will be required to determine the point of connection to the water supply network and identify any necessary upgrades; ▪ Existing hedgerows and boundary trees require retention and protection; ▪ Ecological mitigation measures, including bat surveys and other ecological surveys where necessary, will be required together with appropriate buffering of habitats; ▪ Archaeological investigation and mitigation will be required prior to development; ▪ An 11kV overhead line runs along the eastern boundary of HSG/095/LDP2/5 and may require minor rerouting; ▪ Access to HSG/095/LDP2/2 is dependent on access being provided through the adjoining allocation HSG/095/LDP2/5.	

[22] Implementation Appendix ED10d

None of these constraints are considered significant obstacles.

The public sewerage network and Pembroke Dock WwTW can accommodate foul flows arising from both allocations. Appropriate ecological mitigation can be secured through the retention of hedgerows and boundary trees, the provision of ecological buffers at the southern boundaries of the sites, and sensitive lighting schemes to avoid impacts on protected species. NRW has identified a requirement for a Test for Likely Significant Effects as part of an Appropriate Assessment due to the potential for impacts on the Pembrokeshire Marine SAC. Archaeological matters can be addressed through pre-determination evaluation and planning conditions. Statutory consultation has not identified any constraints that would prevent either site coming forward during the Plan period.

Q2

The Council is of the view that these sites are economically viable, despite the identified constraints. This site has not undergone a Key Site Viability Appraisal.[23] The sites are considered viable with a range of planning obligations including sewerage infrastructure, ecological mitigation, open space contributions and highway requirements.

The allocations provide for a total of 45 dwellings, comprising:

- HSG/095/LDP2/5 (South-East of Southlands): 26 dwellings, including 3 affordable dwellings (15%);
- HSG/095/LDP2/2 (South-West of Southlands): 19 dwellings, including 2 affordable dwellings (12.5%).
- Together the sites will provide 5 affordable dwellings. Planning obligations include off-site contributions towards play facilities at Lower Common Park, ecological mitigation measures, extension of the existing footpath network and water infrastructure investigations through a Hydraulic Modelling Assessment.

Q3

The sites are programmed to come forward during the latter part of the Plan period, with HSG/095/LDP2/5 phased for 2027-2033 and HSG/095/LDP2/2 phased for 2028-2033. The rate and timeframe for development may be subject to further discussion throughout the examination.

This timetable provides sufficient opportunity for nutrient neutrality requirements, ecological mitigation and hydraulic modelling work to be undertaken. No significant infrastructure constraints have been identified. The public sewerage network and wastewater treatment works have capacity to accommodate the development, whilst archaeological, ecological and drainage matters are capable of being addressed through the planning application process. There is therefore no evidence that either allocation will fail to come forward within the anticipated timescale.

[23] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12283&language= ED10a
https://www.pembrokeshire.gov.uk/objview.asp?object_id=12284&language= ED10b
https://www.pembrokeshire.gov.uk/objview.asp?object_id=12285&language= ED10c
https://www.pembrokeshire.gov.uk/objview.asp?object_id=12286&language= ED10d

Q4 The delivery mechanisms are not known at this time. The sites have clear development requirements and identified access arrangements. HSG/095/LDP2/5 will be accessed from the existing Southlands estate road, with HSG/095/LDP2/2 accessed through the adjoining allocation in order to avoid an additional access onto the B4319 St Daniel's Hill. There is no evidence that ownership, infrastructure or environmental constraints would prevent delivery of the allocations. **Q5** The individual sites are not necessarily essential to ensure the soundness of the Plan. However, they contribute towards delivery of both the housing and affordable housing targets. Together, the allocations will provide 45 dwellings, including 5 affordable dwellings, in a sustainable location within the Pembroke Growth Centre. The sites benefit from access to existing services, schools, employment opportunities and active travel infrastructure, including the existing shared user path network serving the Southlands area. The allocations will therefore make a positive contribution towards the implementation of the spatial strategy and delivery of housing within the settlement hierarchy.	
Closed **LPA Response:** HSG/088/LDP2/1 (West of Bloomfield Gardens and North of Adams Drive & Highfield Park, Narberth) SH - ▪ The majority of this site has the benefit of planning permission (23/0654/PA) for 91 dwellings, including 28 social rented affordable homes and 12 LCHO affordable homes (44% affordable units) granted in March 2025. Since that date, several Discharge of Conditions applications have been approved by the Council demonstrating that the site is under construction. Known constraints affecting this site are detailed in the Implementation Appendix (ED10d[24]). The site was granted planning permission in March 2025 and will be delivering above the percentage of affordable units set out under Policy GN 17 of LDP2. There is evidence to show that the developer is preparing to commence delivery of the site (discharge of conditions applications). All of this would suggest that the site is viable. ▪ The grant of planning permission for 91 dwellings including 40 affordable dwellings (44%) indicates that the numbers of dwellings are realistic and deliverable within the Plan period. Policy GN 17 (Residential Allocations) of LDP2 indicates a minimum of 89 units during the Plan period with a requirement of 40% (35) affordable dwellings and a further 35 dwellings to be delivered beyond the Plan period. The site has planning permission.	

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

1. This is a key site and the only site allocation in Narberth. Delivery of this site is therefore considered to be a major contributor to the soundness of the Plan.	
Closed **LPA Response:** HSG/093/00066 (East of Poppy Drive, Neyland) LW **Q1** There are a limited number of constraints for the site: • The site lies within and the wastewater from the development will drain into the Milford Haven Inner Marine Nitrogen Sensitive Catchment. A Test for Likely Significant Effects is therefore required as part of an Appropriate Assessment • The site lies within the Milford Waterway Landscape of Outstanding Historic Importance. • Existing hedged boundaries and trees are to be retained, and a new hedge boundary is required along the eastern boundary of the site. • The site lies on a B-Line and biodiversity enhancement measures will be required. • Any lighting must avoid light spill onto boundary features and ecological corridors. None of these constraints are significant obstacles. Most of the site is on Grade 2 ALC land, but there are no suitable alternative sites available. A water supply can be provided for the site and the public sewerage network and Neyland WwTW can accept the potential foul flows from the development. Ecological mitigation can be incorporated through the retention of hedgerows and trees, together with the provision of a new eastern boundary hedge. Sustainable drainage measures will be required as part of the development. Statutory consultees have not identified any constraints that would prevent the site coming forward during the Plan period. **Q2** This site has been identified as an affordable led housing site (para 4.2.33 of PPW 12 SD80 [25]), allocated for 100% affordable housing. Although the site is in private ownership there is Housing Association interest in the site. The site has been promoted through the Development Plan process. No objection has been received from the site promoters. The site will require a number of planning obligations including highways improvements, active travel infrastructure, education contributions, recreational open space provision and ecological mitigation. The allocation provides for **101 dwellings**, with **100% affordable housing provision**. There has been no objection to the proposal by the site promoters as part of the Deposit Plan consultation. Key requirements include highway improvements to Poppy Drive where necessary, an education contribution towards secondary school provision, provision of	

[25] Planning Policy Wales SD80

three Local Areas of Play and one Local Equipped Area of Play, contributions towards existing Neighbourhood Equipped Area of Play, active travel connections through the site and ecological mitigation measures, including a new hedge to be introduced to form the eastern boundary of the site. **Q3** The site is phased for delivery during the period 2030-2031 (ED34)[26] updated Appendix 2, September 2026_. This provides sufficient opportunity for ecological and transport assessments to be undertaken, and nutrient neutrality requirements to be addressed. There are no significant infrastructure constraints affecting the site. Water supply and foul drainage capacity are available, and the site is not within a flood zone. Highway improvements, active travel connections, drainage measures and ecological mitigation are all capable of being secured and delivered through the planning application process. There is Housing Association interest in the site. It is possible that the site can be delivered in accordance with the proposed phasing and within the plan period. **Q4** The delivery mechanism is not known at this time. However, the site is in private ownership and has been promoted through the Plan preparation process. The site benefits from identified access opportunities from Poppy Drive and a comprehensive set of development requirements set out within Site File (ED13g[27]). There is Housing Association interest in the site. There is no evidence of ownership, infrastructure or environmental constraints that would prevent delivery of the allocation. The Council therefore considers there to be a reasonable prospect of the site being delivered within the Plan period. **Q5** The individual site is not necessarily essential to ensure the soundness of the Plan. However, it makes a significant contribution towards the delivery of both housing and affordable housing targets. The allocation will provide **101 affordable dwellings** within the Urban Settlement of Neyland. The site occupies a sustainable location with good access to services, open space, education facilities and active travel opportunities, including links to the Primary School and the Brunel Trail. The development will therefore make an important contribution towards the implementation of the Plan's spatial strategy and affordable housing objectives.	

[26] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12420&language= ED34 Appendix 2 Local Development Plan 2 Housing Components & Trajectory Update Sept 26

[27] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12294&language= Site Files, Housing/Residential Allocations GN 16 Settlement N-W ED13g