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Written Statement

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Date	22 October 2026
To	Inspector: Ian Stevens Programme Officer: Deborah Williamson
From	Simon Coop, Lichfields
Copy	For and on behalf of Welsh Government: Place Division, Housing and Regeneration Directorate

Subject **Pembrokeshire LDP2 Examination – Hearing Session**
Representor ID: 4393/4394

Matter 8: Site allocations

Issue: Are the allocated sites soundly based and capable of delivering new residential development over the Plan period?

GN 18 Slade Lane, Haverfordwest (S/HSG/040/LDP2/6)

1.0 Question 1: Is the site policy supported by detailed evidence to support its delivery, including Statement(s) of Common Ground? (DPM Table 18)

1.1 The majority of the Maes Slade site was previously allocated under Policy GN27 of the adopted LDP (2011–2021) for the delivery of 971 dwellings and a new primary school (totalling approximately 25.5ha). The proposed allocation within LDP2 carries forward this established strategic allocation and incorporates an additional triangular parcel of land that would facilitate the rounding off of the allocation (now totalling approximately 28.4ha). The principle of residential development at the site has therefore already been established through the development plan process, providing a strong basis for its continued allocation.

1.2 There is also clear evidence of progress and delivery across the wider allocation. Planning permission (18/1040/PA) was granted in July 2019 for 115 dwellings, including 42 affordable homes, with construction subsequently commenced by Lovell. In addition, a reserved matters application (24/0497/PA) for a further 103 dwellings, including 52 affordable homes, was submitted in August 2024 and is currently pending determination. This demonstrates that development is already progressing across the wider strategic allocation and provides evidence of its implementation.

1.3 Welsh Government acquired the Maes Slade landholding in 2023 and has since taken positive steps to progress its development. This has included:

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1 Preparing and agreeing a Planning Performance Agreement (PPA) with PCC in January 2025;

2 Submitting pre-application proposals in February 2025, providing a further update in October 2025;

3 Undertaking ongoing design engagement, including with the Design Commission for Wales (DCfW) in August 2025; and,

4 Preparing a consultation website and holding a public consultation event in October 2025.

1.4 Collectively, this demonstrates Welsh Government's commitment to bringing the site forward and establishing a coordinated approach to progressing the proposals through the planning process.

1.5 Whilst the Maes Slade site has not progressed as quickly as initially anticipated, this has been due to the need to identify an appropriate solution to achieve nutrient neutrality mitigation. These matters have inevitably affected the programme for progressing a planning application in respect of this site (along with others). However, work to address this remains ongoing, with a number of potential mitigation options being actively explored.

1.6 Against this background and drawing on the technical work and engagement undertaken to date, Welsh Government is working towards the submission of an outline planning application, with all matters reserved except access, in early 2027. This anticipated timescale demonstrates a clear intention to progress the site and provides an identifiable route towards securing planning permission.

1.7 Further evidence supporting the deliverability of the site is provided through the Statement of Common Ground (SoCG) which is subject to agreement between Welsh Government and PCC. This confirms a shared position on the affordable housing requirement for Maes Slade, with 30% figure now agreed, subject to further viability assessment at application stage to reflect the costs of nutrient mitigation. The SoCG represents an important step in addressing matters previously raised in relation to the allocation and provides greater clarity and certainty regarding the policy requirements for the site. Together with the ongoing technical work and pre-application engagement, this provides further confidence that the site will come forward for the delivery of new homes within the Plan period.

1.8 Welsh Government's ownership and continued promotion of the site provides further confidence in its prospects for delivery. As a public-sector landowner, Welsh Government is committed to supporting the delivery of new homes, including affordable housing, and increasing housing supply to meet identified needs. The progression of the Maes Slade proposal is consistent with these wider objectives which demonstrate a continued commitment to bringing forward residential development in this location.

1.9 Taken together, the site's established planning history, evidence of development progressing across the wider allocation, Welsh Government's continued investment and engagement, the agreement reached through the SoCG and the identified programme for submitting an outline planning application provide a substantive basis for supporting its

continued allocation within LDP2. Whilst nutrient neutrality considerations have created delays, work is ongoing to implement an appropriate mitigation solution. It is therefore expected that the site can be brought forward for development within the Plan period, consistent with the deliverability requirements of the Development Plans Manual (Edition 3).

2.0 Question 2: What are the constraints affecting the site, and are these constraints significant obstacles to development within the Plan period?

2.1 The principal constraint affecting the progression of the Maes Slade site relates to nutrient neutrality and the need to identify an appropriate mitigation solution. This has contributed to delays in bringing forward the site, but work is actively progressing to explore potential mitigation options, with a view to establishing a suitable approach through the planning process. Whilst a final scheme of mitigation remains to be confirmed, the identification of a number of alternative options means that there can now be a good level of confidence that this issue will not prevent the delivery of new homes on this site within the LDP2 period.

2.2 The site's topography and associated requirements for earthworks, access, drainage and infrastructure represent further constraints which will need to be considered and addressed through detailed design and masterplanning process. These are typical considerations for a strategic development site of this nature and are not considered to represent significant barriers to delivery, albeit that they will generate additional development costs. In the case of delivering an access route from Thomas Parry Way into the first development parcel, this will increase the time between the commencement of construction and delivery of the first home within the site owned by Welsh Government.

2.3 These constraints are not considered to be fundamental to the suitability of the site for residential development. Subject to these matters being appropriately addressed through the design and planning processes, the site remains capable of contributing to housing delivery during the Plan period.

3.0 Question 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?

3.1 The site is considered capable of being economically viable, subject to realistic assumptions and the appropriate resolution of nutrient mitigation, affordable housing and infrastructure requirements. The Council's viability assessment did not take into account the costs associated with nutrient mitigation. We consider that it would be appropriate to undertake further modelling to reflect the costs associated with delivering a comprehensive residential development, including nutrient mitigation.

3.2 As the largest housing site in Pembrokeshire, Maes Slade is critical to meeting the LDP2 housing requirement and addressing the need for housing in Haverfordwest and

Pembrokeshire more generally. As with all development sites, its deliverability is, however, subject to a consideration of viability.

3.3 We have addressed this matter in detail in our representations to the LDP2 Focused Changes. By way of summary, the Council's original strategic viability evidence did not fully test the Maes Slade site; Welsh Government consequently commissioned Savills to undertake a site-specific assessment, subsequently reviewed by BHL. This assessment, which applies the same assumptions as the Council's viability review, concludes that a 25% affordable housing provision would be viable but that the previously proposed 50% provision – which is not supported by any evidence – is not. This is broadly consistent with that of the Council's Financial Viability Assessment (FVA) which concluded that *"the highest level of affordable housing that can be viably delivered in any part of Pembrokeshire is 25%"*.

3.4 Following further engagement, a requirement of 30% affordable housing at Maes Slade has now been agreed between Welsh Government and Pembrokeshire County Council through a Statement of Common Ground. This figure will need to be revisited at application stage following consideration of costs associated with nutrient mitigation, given that this has not informed the Council's current policy position.

3.5 Welsh Government also notes apparent inconsistencies between certain allocation-specific affordable housing percentages and the dwelling-number bands in emerging Policy GN20. The Council should ensure that the final policy schedule is consistent and supported by its evidence and this should explain and justify any deviations in the requirements associated with different sites.

3.6 The Band 3 allocations that are listed in the Financial Viability Review (FVR, Feb 2026) are broken down below:

Table 1: Band 3 allocations

Allocation	Estimated number of units	Affordable housing in Plan	Affordable housing as per unit range in Policy GN 20
St David's, Pembroke	147	25%	Should be 30%
Golden Hill	50	20%	Should be 25%
Pembroke Road	51	22.5%	Should be 25%
Slade Lane	330 (in plan period)	50%	Should be 30%
Clunderwen	31	25%	Should be 15%
Gibbas Way	43	25%	Should be 20%

Source: FVR (Feb 2026)

3.7 The final costs and mechanism for nutrient mitigation also remain important variables in the site's viability. Until a deliverable solution and its associated costs are established, it is difficult to reach a definitive conclusion on the precise level of affordable housing and other planning obligations that can be supported. It is for this reason that we anticipate that detailed viability assessment will be required at planning application stage.

3.8 The allocation is therefore considered to be capable of being viable, but this conclusion is dependent on the assumptions used in the viability assessment. In particular, the affordable housing requirement requires correction, and the implications of nutrient mitigation must be properly accounted for, noting that this has not currently been factored into the Council's viability modelling. A proportionate and evidence-based approach to affordable housing and other planning obligations will be necessary to secure development without undermining delivery.

4.0 Question 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?

4.1 The assessment of housing capacity must consider the wider Maes Slade development as a whole, including the dwellings being delivered by Lovell and Pobl, alongside the development proposed on the Welsh Government site.

4.2 The initial viability and capacity assessments appear to have applied a relatively broad density-based assumption without fully accounting for the particular characteristics and infrastructure requirements of the site. The realistic capacity should instead be informed by a design-led assessment that considers topography, access, drainage, open space, the proposed primary school and playing fields, the proposed local centre and other necessary land uses, together with the need to achieve best practice in respect of placemaking and the achievement of principles associated with the Wellbeing of Future Generations.

4.3 The emerging masterplan provides an important mechanism for establishing an appropriate development capacity and ensuring that the allocation creates a coherent, sustainable and high-quality place. The number of dwellings should be consistent with the space required for supporting infrastructure and the relevant placemaking objectives, rather than being determined solely by a theoretical density multiplier.

4.4 Having regard to and drawing on the current masterplanning and design work to date, a total capacity of approximately up to 600 dwellings is considered reasonable for the Maes Slade site. Having regard to expected time required to secure detailed planning permission and commence delivery, as well as expected build rates, it is anticipated that 158 homes will be deliverable during the Plan period. This represents 26.3% of the total Maes Slade site, albeit that a greater level of development will be achieved, if possible, to match the Welsh Government's housing ambitions.

5.0 Question 5: What are the mechanisms and timescales for delivering the site?

5.1 The signed Planning Performance Agreement, the pre-application submission in February 2025 and the subsequent update note in October 2025 demonstrate an established process of engagement with Pembrokeshire County Council. These mechanisms provide a framework for progressing the proposals and identifying any matters that must be resolved before submission and determination of the application.

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5.2 It is intended to submit an outline planning application in early 2027 and we expect that this would be determined by the end of 2027. Welsh Government intends to dispose of the site to a number of different developers, including SME house builders and housing associations, prior to the preparation and submission of applications for the approval of Reserved Matters in 2028. It is currently expected that construction would start on the part of the site that is in the ownership of Welsh Government by 2030, and sooner if possible, to match the Welsh Government's housing ambitions.

5.3 An indicative delivery rate of approximately 50 dwellings per annum is considered to be an appropriate starting point for assessing delivery, subject to confirmation against the agreed viability and trajectory evidence. This rate is derived from Lichfields' *Start to Finish*[1] research and represents a 25% reduction from the average delivery rate for sites within the 500–999 dwelling band. This adjustment reflects the location of the site in Haverfordwest (i.e. away from a prime market area), site-specific characteristics and the time required to establish and deliver the necessary infrastructure. It therefore provides a realistic basis for assessing delivery in this location rather than assuming a continuous or maximum theoretical rate of construction.

5.4 The anticipated timescales and annual housing completions should be consistent with the trajectory set out in the relevant viability assessment and the agreed evidence presented to the examination. In particular, the trajectory should reflect the realistic commencement date, the time required to discharge relevant pre-commencement requirements and an appropriate annual build-out rate.

5.5 Table 2 translates this trajectory into a series of planning and delivery milestones. This shows that the land in the ownership of Welsh Government can be expected to deliver 158 homes over the LDP2 period.

Table 2 Indicative Maes Slade delivery trajectory (financial years)

Milestone	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033[2]
Outline application submission								
Outline determination								
Site disposal								
Reserved matters submissions / approvals								
Conditions and detailed infrastructure design								

[1] https://lichfields.uk/content/insights/start-to-finish-3#downloadcollapse

[2] This assumes 8 months of the 2033 calendar year in line with the Local Plan period

Milestone	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033[2]
Enabling works / strategic infrastructure								
Indicative housing completions (dpa)	-	-	-	-	25	~50	~50	~33

Source: Lichfields.

The 2033 column is shown for context and may extend beyond the relevant Plan period. Completions are illustrative, not a cumulative forecast.

6.0 Question 6: Is the site allocation essential to ensure the soundness of the Plan?

6.1 The Maes Slade site is a major residential development opportunity in Haverfordwest and has a longstanding role in the planned and sustainable growth of this primary settlement. Its allocation builds on the existing development plan position and supports the delivery of a substantial number of new homes alongside associated community infrastructure.

6.2 The site is expected to make a significant contribution to the LDP2 housing requirement. Its anticipated housing contribution during the Plan period should be considered in the context of the overall supply of housing sites in Haverfordwest and across Pembrokeshire.

6.3 The allocation supports the role of Haverfordwest as a primary settlement within Pembrokeshire and thereby accords with the defined settlement hierarchy and development strategy as set out in the LDP. The development of this site will ensure that the provision of housing can be coordinated with supporting infrastructure and community facilities. Removing the allocation would require the Council to demonstrate how the resulting shortfall could be accommodated elsewhere without undermining the Plan's spatial strategy or housing supply assumptions.

6.4 The potential consequences of not delivering this allocation should be considered against the availability, capacity and delivery prospects of alternative sites. Given the scale of the Maes Slade allocation, losing its contribution could necessitate additional allocations or increased reliance on alternative sites, with consequential implications for the settlement strategy and the overall housing trajectory. Alternatives may be in less sustainable locations that would fail to make the same contribution to the settlement strategy.

6.5 The Maes Slade site has been identified for residential development through the existing LDP and has progressed to the point where development is underway on the initial phases. The continuing work by the relevant land interests and public bodies demonstrates that the allocation is supported by established development objectives rather than representing a wholly new or untested proposal.

6.6 The Maes Slade allocation is therefore considered essential to the effective delivery of the Plan's housing strategy for Haverfordwest. It provides a significant and established opportunity to accommodate residential growth alongside the infrastructure and community facilities required to support it.

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7.0 Question 7: Does the policy include all essential requirements to deliver the site?

7.1 Policy GN 18 establishes the intended residential use of the site and identifies the wider development components, including open space, a new primary school, school playing fields, community facilities and sustainable travel proposals. These requirements provide a basis for coordinating residential development with the supporting infrastructure needed to create a sustainable neighbourhood.

7.2 Welsh Government supports a comprehensive approach but seeks a level of precision to avoid uncertainty in delivery. In particular, following constructive engagement with PCC's Education Department, the school requirement should be identified as a two-form-entry (2FE) primary school. The policy should also clearly recognise provision of a local centre.

7.3 The policy recognises the scale and complexity of the site and the need for a coordinated approach. The proposed masterplan for the wider Maes Slade area is intended to establish a comprehensive framework for the relationship between residential development, community facilities, movement and open space.

7.4 Implementation of the policy should be consistent with the affordable housing and infrastructure requirements detailed in the Plan and established through its evidence base. For the reasons set out above, the affordable housing requirement and the treatment of other planning obligations should be sufficiently clear to avoid uncertainty over the requirements applicable to the allocation.

8.0 Question 8: Does the policy contain sufficient placemaking and master planning detail?

8.1 Policy GN18 provides an appropriate and proportionate level of detail on placemaking and masterplanning matters and is therefore considered sufficient to guide the preparation of development proposals. It sets out the anticipated use of the site, together with the delivery of the initial phases by Codi Group (formerly Pobl). It highlights the necessity for a collaborative approach due to both the scale and complexity of the site.

8.2 The design process and resultant illustrative masterplan and planning application will adhere to the six key principles of DCFW's Placemaking Wales Charter to create a distinctive and attractive environment for future residents. The preparation and submission of a Design Code for the development at Maes Slade will not only support the aspirations of the policy to deliver a successful new neighbourhood for Haverfordwest; it is understood that this document will also be adopted as Supplementary Planning Guidance to shape the site's future development.

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Appendix 1 : Lichfields' *Start to Finish* Average Build-Out Rates

Table 4.2 Average build-out rates by size of site (dwellings) comparred with the first and second editions of the research

Site Size (dwellings)	Mean build-out rate (dpa)				Median build-out rate (dpa)		
	First Edition	Second Edition	Third Edition		Second Edition	Third Edition	
50-99	27	22	20		27	18	
100-499	60	55	49		54	44	
500-999	70	68	67		73	68	
1,000-1,499	117	107	90		88	87	
1,500-1,999	129	120	110		104	104	
2,000+	161	160	150		137	138	

Source: Lichfields analysis