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23rd October 2026

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PEMBROKSHIRE COUNTY COUNCIL LOCAL DEVELOPMENT PLAN 2 EXAMINATION

RESPONSE TO MATTERS AND ISSUES – MATTER 9 (HEARING SESSION 8)
SITE ALLOCATIONS: SERVICE CENTRES AND SERVICE VILLAGES

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

This submission comments on matters and issues raised by, and set out in, the Inspectors' Matters and Issues Agenda to cover Matter 9: Site allocations – Service Centres and Service Villages: *"Issue – Are the allocated sites soundly based and capable of delivering new residential development over the Plan period?"*

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

Yours sincerely,

Geraint John
Director
Geraint John Planning Ltd.

PREFACE

This submission relates to the matters and issues raised by, and set out in, the Inspectors' Schedule of Matters, Issues and Questions to cover Matter 9: Site allocations – Service centres and service villages: *"Issue – Are the allocated sites soundly based and capable of delivering new residential development over the Plan period?"*

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

This Submission

It should be noted that these submissions do not necessarily respond to every question raised within the Inspector's Schedule of Matters, Issues and Questions, as not all of these questions necessitate a response by us, and/or earlier submissions made on behalf of the promoting party (Representor ID. 4475). It is considered in particular that the submissions made at the Deposit Plan stage – December 2024 are considered sufficient to address the majority of the matters raised, and moreover provides considerable plan based evidence of the points made herein. Accordingly, these representations only provide responses to questions where it is considered necessary and relevant to do so, and do not repeat the content of the Deposit Plan representations.

At the outset, it is essential to set out of that these representations support in principle the allocation of the site (LDP2 Ref. HSG/048/00038) for residential use.

Notwithstanding this, our client wishes to object to part of the site's exclusion as an allocation for residential (which is identified as Recreational Open Space in the Deposit Plan). The reasoning for the objection is set out in further detail in these representations below. The site was allocated to provide 92no. units, of which 50no. were expected to be delivered in the Plan period up to 2033. These figures have now been revised through further work by the LPA, and comments on this revised position are set out herein and in other submissions to the Examination. This is the case in particular in respect to Matter 5 (Hearing Session 5), when considering open space provision (and the on-site provision as pat of this allocation). These submissions also make submissions in respect to the total number of units expected to be yielded from the (suggested amended) site.

The representations previously made at the Deposit Plan stage set out the following:

- Supported Policy GN16 and its provisions, and the intended allocation of the site;
- Objected to the site's part exclusion as an allocation, in light of the allocated Recreational Open Space;
- Objected to the number of units allocated for the site - suggesting the minimum number should be marginally reduced;
- Suggested detailed changes to the proposed trajectory of the site in the Plan period - Suggesting that the entire number of units could come forward and be delivered in the plan period; and
- Suggested detailed terminology changes to the wording of Policy GN15 - to introduce flexibility within the terminology and language.

Insofar as responses to the Matters, Issues and Questions raised as part of the Examination process, and in the above context, the following is set out.

QUESTIONS

Matter 9: Site allocations: Service Centres and Service Villages

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

HSG/048/00038 (North of Hayston View, Johnston)

1. *What are the constraints affecting the site, and are these constraints significant obstacles to development within the Plan period?*

   As confirmed by the detailed Housing Residential Allocation site assessment work produced for the site, and published as part of the process, the site is recorded as having no constraints.

   As recorded in the detailed assessment, and in summary, the allocation is a greenfield site, and will effectively form an extension the existing settlement – which it adjoins. The site is owned and promoted by the developer of active and successful sites in the wider area. The promoter accordingly has detailed and unparalleled knowledge of, and experience in, delivering sites in the vicinity.

   As recorded in the detailed Housing Residential Allocation Site Assessment work, the site is : greenfield; capable of being accessed; has adequate water supply; has sufficient foul water capacity; is not within a flood zone; can be capably drained via SuDS; has an electricity supply source adjacent; and there are no known contamination issues.

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?*

   The site has, as set out above, no constraints of significance, and as such is deliverable.

   It has also been confirmed through a Development Viability Assessment (prepared jointly with the Council's appointed advisers – BHL) that the allocation is economically viable. The findings of the Update / Addendum in respect to Financial Viability (Feb 26), which recognises and records changes in values and costs, will influence final levels of provision. Notwithstanding this, the site is considered to be economically viable.

   Afterall, the site and allocation is owned by, and promoted by, a housing developer who has a significant track record in delivering housing in the vicinity.

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?*

   In part. The client is of the view and opinion that the site can, and will, yield earlier and quicker than currently provided for in the Housing Trajectory. This is a product and consequence of sites currently under development but the company within the vicinity nearing completion, and the desire to advance other sites as quickly as possible for continuity reasons.

   Other than the requirements for nutrient neutrality, the provision of an active travel shared use path, the need to attend to (and mitigate) some ecological features, and the retention of trees and landscaping on the site's boundary and periphery, there are no other onerous constraints or provisions deemed applicable.

   The client is of the view however that flexibility ought and needs to be introduced in respect to the number of units, and the location, configuration and size of the proposed open space within the site. These are considered too prescriptive as currently defined, and will potentially inhibit the site's optimum form, and its

delivery. This contention is based on considerable knowledge and experience of successfully developing sites within the county, and factoring in known market demand.

4. *What are the mechanisms and timescales for delivering the site?*

   A planning application can and will be prepared swiftly and in the short term. This will be informed by, and enabled by, the considerable work and evidence on nearby sites, and the considerable supporting and assessment detail formulated for the promotion of the allocation of the site.

5. *Is the site allocation essential to ensure the soundness of the Plan?*

   It is considered that the allocation is key to the ensuring the soundness of the Plan – not least by virtue of the contribution that the site will make to early delivery of units in this part of the Plan area, and the continuity of build for an active housebuilder with a track record in delivering units in the area (and making a valuable contribution to housing land supply in the process).

Conclusion

In summary, the following is the representors response to the Schedule of Matters, Issues and Questions set out.

This greenfield unconstrained site, promoted by an award winning Housebuilder with a track record in delivering significant numbers of units in the vicinity is inherently suitable and deliverable.

The development of this site, informed by considerable work and evidence to date, will see the bringing forward of units in the short term, and early in the Plan period – making a significant contribution to housing land supply and yield in the process.

It is considered that the endorsement of the allocation of North of Hayston View, Johnston will ensure a readily deliverable site to come forward.