



**Adroddiad i Gyngor Sir
Penfro**

**Report to Pembrokeshire
County Council**

gan Mark Dakeyne BA (Hons) MRTPI
Arolygydd a benodir gan Weinidogion Cymru
Dyddiad: 05/02/2013

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an Inspector appointed by the Welsh Ministers
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PLANNING AND COMPULSORY PURCHASE ACT 2004

SECTION 64

**REPORT ON THE EXAMINATION INTO THE
PEMBROKESHIRE COUNTY COUNCIL
LOCAL DEVELOPMENT PLAN
ADOPTION - 2021**

Plan submitted for examination on 19 March 2012

Examination hearings held between 4 September and 4 October 2012

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Summary

This report concludes that the Pembrokeshire Local Development Plan provides an appropriate basis for the planning of the County up to 2021. The Council has sufficient evidence to support the Plan and can show that it has a reasonable chance of being delivered.

The examination process has revealed that changes are needed to ensure that the Plan is sound. The main changes are summarised below:

- The distribution of growth amended to a 60% urban/40% rural split;
- The policy on developer contributions amended to clarify how priorities for individual developments will be assessed;
- Changes to the affordable housing target and affordable housing policies to take into account updated viability assessments;
- Revisions made to the policy on resource and energy use to build in flexibility in view of likely changes in national policy;
- The inclusion of a policy to define Green Wedges;
- Criteria-based policies amended to ensure coherence across the Plan and that they are consistent with each other and with national policy;
- The inclusion of an employment site allocation in Narberth;
- The deletion of the Energy from Waste allocation;
- The position of Martletwy in the settlement hierarchy is changed from a Service Village to a Small Local Village and the housing allocation is deleted;
- The Monitoring Framework revised to incorporate additional key indicators, targets and triggers.

Most of the changes recommended in this report are based on suggestions by the Council in response to points raised during the examination. There are a few instances where I impose changes on the Council. None of the changes alter the overall thrust of the Plan’s strategy.

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1 Introduction

- 1.1 Under the terms of Section 64(5) of the Planning & Compulsory Purchase Act 2004, the purpose of the independent examination of a Local Development Plan (LDP) is to determine:
- (a) whether it satisfies the requirements of sections 62 and 63 of the Act and of regulations under section 77; and,
 - (b) whether it is sound.
- 1.2 This report contains my assessment of the Pembrokeshire County Council Local Development Plan: Adoption - 2021¹ (from here referred to as “the LDP” or “the Plan”) in terms of the above matters, along with recommendations and the reasons for them, as required by section 64(7) of the Act.
- 1.3 The starting point for the examination is that the local planning authority has submitted what it considers to be a sound plan, together with the evidence base that supports its position. The submitted LDP has been considered against the tests of soundness set out in paragraph 4.35 of *Local Development Plans (LDP) Wales, 2005*. I am satisfied that the LDP meets the requirements of the Act and Regulations.
- 1.4 Since the purpose of the examination is to determine whether the Plan is sound I recommend changes in this binding report only where there is a clear need to amend the Plan in the light of the legal requirements and/or the tests of soundness. I am satisfied that these changes are in line with the substance of the overall Plan and its policies, and do not undermine the Sustainability Appraisal (SA) and participatory processes that have been undertaken.
- 1.5 All duly made representations and the matters raised at the examination Hearings have been considered. However, given the focus of the examination on soundness, the report does not refer specifically to the individual representations made in each case. Matters raised by individual representations are referred to only where it is considered that they raise substantive issues concerning the Plan’s soundness or where commentary would assist in understanding my conclusions on soundness. Plan changes sought by any representor are the subject of a recommended change only where it has been found, on the basis of all of the evidence, that such a change is required.
- 1.6 A number of representors propose alternative sites to those allocated in the Plan, most notably for housing development. The starting point for the examination is that the Local Authority considers that it has produced a strategy, policies and allocations that are sound. There are likely to be a number of ways that the Authority can meet the needs of its community and all could be equally valid. Some may consider that the allocations in the Plan do not present the best solution but I am limited by statute and can only recommend a change to make the Plan sound. I

¹ For the County excluding the Pembrokeshire Coast National Park (PCNP)

cannot seek to make a sound plan better. Subject to the proposed changes referred to in this report, including the inclusion of an additional employment allocation, the Plan submitted for examination is considered to be sound. In light of this conclusion, there is no need to allocate other sites.

Post-Deposit Changes

- 1.7 Prior to submission of the LDP for examination the Council considered the representations received and decided to make a number of Focussed Changes (FCs) to the Plan. These changes were subject to consultation between February and April 2012. The responses were taken into account.
- 1.8 Early in the examination process the Council confirmed that the Plan it wished to be examined was the Deposit LDP as modified by the Proposed FCs. Since these changes have been subject to consultation and SA as necessary², they are accepted as part of the submitted LDP. The Deposit Plan, as modified by the FCs, therefore, forms the starting point for the examination of the Plan’s soundness. All changes set out in the appendices to this report are changes to this composite document, which I shall refer to as the “submitted plan”.

Recommended Changes

- 1.9 In addition to the changes referred to above, the Council has submitted a number of proposed changes to the Plan in response to matters raised during the examination, including issues discussed at the hearing sessions. These have been consolidated into a Schedule of Matters Arising Changes (MACs). The changes were subject to consultation between 31 October and 12 December 2012. I have considered the responses to the consultation on the MACs in preparing this report.
- 1.10 The MACs set out in Appendix A of this report are based on the Schedule which was subject to consultation. The MACs highlighted with bold type and grey shading are changes that are required to ensure that the Plan is sound and I recommend these changes accordingly. These MACs are addressed in this report in which they are also shown in bold type. The other MACs in Appendix A are not required to make the Plan sound. However, whilst not essential to the Plan’s soundness, they are endorsed as they add clarity and precision or improve the Plan’s coherence and consistency. Such changes are only referred to in this report where necessary to support my reasoning and conclusions. They are shown in non-bold type both in the report and in Appendix A.
- 1.11 Appendix B sets out the other changes that are also necessary for the Plan to meet the tests of soundness (Inspector’s Changes – **IC01 – IC05**).

² Sustainability Appraisal Report Deposit Plan – Incorporating Post Deposit Changes March 2012

1.12 For the avoidance of doubt, the Council is also authorised to make any necessary minor editorial changes to the Plan arising from the inclusion of the changes recommended and endorsed by this report.

1.13 Edition 5 of Planning Policy Wales – November 2012 (PPW) was published during the preparation of this report. The changes in national policy do not raise issues which affect the soundness of the Plan. However, some changes to the Plan have been put forward by the Council to maintain consistency with national policy which I recommend and endorse. The changes are included in the MAC Schedule. The Council is also authorised to make any minor editorial changes arising from the latest edition of PPW.

Documents

1.14 All documents referred to in this report are contained within the Examination Library:

<http://www.pembrokeshire.gov.uk/content.asp?nav=1626,109&id=24880&language=>

2 Procedural Tests

- 2.1 The LDP has been generally prepared in accordance with the Delivery Agreement (as revised by agreement with Welsh Government³) and the Community Involvement Scheme (CIS). The LDP was submitted for examination one month later than anticipated by the Delivery Agreement but this is a minor variation in the context of the LDP process as a whole.
- 2.2 The CIS identified a number of methods of engagement and consultation for the LDP. The Initial Consultation Report (ICR) sets out what consultation methods were used up to Deposit Plan stage. The only deviation between the CIS and the consultation actually carried out was that the Citizen’s Panel was not used from the Pre-Deposit Stage onwards. However, alternative methods of engagement were used as set out in Appendix 1 to the ICR. The Consultation Report March 2012 indicates that all methods of involvement identified in the CIS were followed at Deposit Plan stage.
- 2.3 The Council went beyond the consultation methods identified in the CIS. For example, notices were placed on sites subject to Deposit Plan allocations or Alternative Site proposals. The failure to display a site notice on a particular site was unfortunate. However, as site notices went beyond statutory requirements and were not a consultation method identified in the CIS, the failing does not make the Plan procedurally unsound.
- 2.4 The Delivery Agreement referred to the establishment of a Key Stakeholder Group (KSG). The make up of the Group matched that of the Community Planning and Leadership Partnership which was closely involved in delivering the Community Plan. It was logical for there to be consistency between the two groups, having regard to soundness test C1. Interest groups not involved in the KSG have had ample opportunity to be engaged by other consultation methods.
- 2.5 All prescribed documents, including supporting documentation, have been made available on the Council’s website, in libraries and Council offices across the County and at key cross-boundary locations.
- 2.6 I am satisfied that the Plan complies with the requirements of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 including those relating to consultation, advertisement and the publication and availability of prescribed documents.
- 2.7 The Plan has been subject to SA including Strategic Environmental Assessment (SEA)⁴. FCs⁵ and further changes (MACs) have likewise been tested where necessary for any impacts they have upon the SA

³ Delivery Agreement 2nd Revision December 2010

⁴ See Footnote 2

⁵ See Footnote 2

and SEA.

- 2.8 In accordance with the Habitats Directive⁶, a Habitats Regulations Appraisal (HRA) of the Plan has been undertaken⁷. I am satisfied that the results of the HRA Screening Report show that an Appropriate Assessment of the Plan is not required, due to the mitigation measures developed during Plan preparation. Therefore, it can be concluded that no significant effects upon the integrity of the European sites⁸ within the Plan area or in adjacent areas are likely to occur (either alone or in combination with other plans or projects) as a result of the Plan.
- 2.9 In conclusion, procedural soundness tests P1 and P2 have been satisfied and the relevant legal requirements complied with.

⁶ European Union Habitats Directive (92/43/EEC)

⁷ Pembrokeshire County Council LDP: Habitat Regulations Appraisal Report – Deposit Plan – Incorporating Post Deposit Changes - March 2012

⁸As defined in PPW (Paragraph 2.4.6)

3 The Overall Plan Strategy

The Development Strategy and Settlement Hierarchy

- 3.1 The Strategy of the Plan derives from the Vision, Objectives and Sub-Objectives for the LDP which themselves were developed from the baseline information, priorities and visions from the Pembrokeshire Community Plan (2010) and the Wales Spatial Plan Update 2008 (WSP) Vision for Pembrokeshire – the Haven. The LDP Vision seeks to create a network of strong urban and rural communities. The LDP Strategy expresses this Vision by seeking a reasonably balanced distribution of new development between urban and rural Pembrokeshire, noting that 45% of the population already live in the rural area. However, the intention is that development is to be focused on settlements with a reasonable level of service provision and where infrastructure is available. All development would be subject to an over-arching sustainable development policy, SP 1.
- 3.2 The WSP classifies the larger settlements in Pembrokeshire as Hub Towns, Medium Sized Settlements or Local Centres. The LDP has the same settlements as Hub Towns⁹, defines Narberth as a Rural Town rather than a Medium Sized Settlement and designates the other Local Centres as Service Centres. The classification of settlements is consistent with the WSP. The LDP adds Johnston as a Service Centre, reflecting its size and function, and to ensure consistency with the other Service Centres of Crymych, Letterston and Kilgetty. There is a level of compatibility with neighbouring authorities who have also developed¹⁰ or are developing¹¹ strategies that are in line with the broad settlement framework of the WSP. Policy SP 14 promotes a range of developments in the Hub Towns, including those which would encourage complementary relationships between them.
- 3.3 Haverfordwest is the most populous of the County’s towns, albeit not significantly larger than Milford Haven. It is defined as a sub-regional town centre by retail Policy SP 4 of the Plan and has a greater range of services than other settlements such as a district hospital and the County Offices. The quantum of housing allocations is greater than any other town in the County. In these respects the Plan recognises the role of Haverfordwest as a Sub-Regional Centre whilst maintaining its designation as a Hub Town. This approach sits comfortably with the need for the Haven Towns to complement rather than compete with one another¹².
- 3.4 The LDP strategy picks up on other themes of the WSP by making provision for employment opportunities close to the Milford Haven Waterway. In particular Policy SP 2 recognises the potential for areas around Milford Haven and Pembroke Dock for port and energy related

⁹ Haverfordwest, Milford Haven, Neyland, Pembroke, Pembroke Dock, Fishguard and Goodwick

¹⁰ Pembrokeshire Coast National Park Authority (PCNPA) LDP adopted September 2010

¹¹ Ceredigion County Council and Carmarthenshire County Council Deposit LDPs

¹² Page 86 of the WSP

development. Policy SP 3 allocates strategic employment sites near Pembroke Dock and Milford Haven. The focus of the WSP on regenerating towns is given effect by the Plan’s retail policy approach. Housing is to be delivered in both urban and rural communities throughout the Plan area. The Plan Strategy has regard to the WSP.

- 3.5 There is a limited supply of previously-developed land (pdl), given the County’s predominantly rural nature. Some pdl, such as former airfields, is not in sustainable locations. However, other opportunities to make use of pdl have been taken, including the strategic employment allocations at Trecwn and Blackbridge. Pdl, where it is well-related to settlements, has been included within settlement boundaries. The Plan takes a balanced approach, using pdl where possible¹³.
- 3.6 The LDP groups smaller settlements in the County, not referred to in the WSP, depending on an analysis of service provision and size. Therefore, Service Villages, Large Local Villages and Small Local Villages make up the remaining components of the settlement hierarchy. Settlement boundaries are defined at all levels of the hierarchy, including the smaller villages, to give clarity as to where infilling and affordable housing opportunities would be appropriate and to assist with the interpretation of other policies of the Plan, particularly those relating to the economy and community facilities. In terms of Service Villages, a need to ensure a geographical distribution has also been factored in, with the intention that no rural area is more than 3 miles from a Service Village. It is appropriate that the LDP has drilled down to smaller settlements than those referred to in the WSP, whilst aligning with the overall approach of the WSP.
- 3.7 The analysis of service provision in the villages was undertaken in 2007/08 with some limited updating in 2010¹⁴. There has been a decline in service provision in some settlements since the survey. An up-to-date survey would reveal that some settlements, such as Simpson Cross, would no longer “qualify” as a Service Village. Nevertheless, it is appropriate that Plan preparation, the strategy and the hierarchy uses a consistent base date. However, in recognition of the need to monitor service levels in the villages to inform Plan Review, the Council proposes changes to the Monitoring Framework which I support (**MAC119**).
- 3.8 Turning to those Service Villages that have a limited range of services but have been defined to ensure geographical distribution, I can see justification for the settlements of Haycastle Cross and Pont-yr-Hafod having this status. Taken together their service provision is reasonable and they support a large rural hinterland. However, there is insufficient justification for Martletwy to be defined as a Service Village. It has very few services and a small population. A small housing allocation is unlikely to make the provision of services viable.

¹³ PPW Paragraph 4.9.1

¹⁴ Rural Facilities Survey Report December 2008 Updated October 2010

Lawrenny has a reasonable range of services¹⁵, has an allocation for 30 dwellings and is within 3 miles of Martletwy, albeit in the National Park. Removing Martletwy from the list of service villages would leave only a small pocket of countryside more than 3 miles from a service village. Therefore, I recommend that Policy SP 12 (The Settlement Hierarchy) be changed by deleting Martletwy as a Service Village and including it as a Small Local Village (**IC01**). Consequent amendments are required to the related Footnote, the Key Diagram and the Proposals Map Document.

The Distribution of Growth

- 3.9 The Plan seeks a balanced distribution of housing growth between urban and rural areas. However, the examination has revealed that the LDP is likely to deliver housing development in the order of some 60% in urban areas and 40% in rural areas rather than the 50/50 split indicated in the submitted Plan. The revised split reflects the distribution of allocations and takes into account a reduced estimate of dwellings anticipated to be delivered by windfalls in Local Villages and by countryside dwellings. The rural windfall figure contained in the submitted Plan is an over-estimate as it is based in part on the historic delivery under the JUDP. The policy approach of the LDP for rural areas is more restrictive and relatively untested. Consequently changes are needed to the text of the Plan and Table 2 in Appendix 3 (Housing Supply) to reflect this change in the balance (**MAC09**, **MAC21** and **MAC117**). A Monitoring Indicator is also proposed to monitor rural windfalls so that any significant take-up above the estimate and consequent distortion of the spatial strategy is taken into account in Plan Review (**MAC119**).
- 3.10 The distribution of housing would achieve a reasonable balance between concentrating development in the main settlements and sustaining rural communities. It would represent a change from the Pembrokeshire Joint Unitary Development Plan (JUDP) which proposed a 70/30 urban/rural split for the County as a whole. However, the change is consistent with the WSP and would not undermine the objective of achieving sustainable development.
- 3.11 The Plan also makes provision for reasonable levels of both housing and employment development in those areas of the county where the Welsh language plays a significant role, predominantly the rural areas in the north and north-east of the county. In addition the Plan seeks to ensure that development is managed sensitively in these areas to protect the cultural and linguistic profile. Phasing is proposed for the housing allocation in Wolfscastle so that the development can be gradually absorbed into the local community. Phasing and other measures could also be applied to other developments, including windfalls, through Policy SP 9 (Welsh Language).

¹⁵ Defined as a Rural Centre in the PCNPA LDP

3.12 The amount of growth and the size of housing allocations within settlements are intended to reflect their position in the settlement hierarchy. No allocations are proposed in Local Villages which have few services and facilities. In these villages settlement boundaries have been drawn fairly tightly so that development opportunities are limited to small infill schemes with an emphasis on affordable homes for local needs. The approach to housing in Local Villages is consistent with national planning policy¹⁶.

3.13 Most employment allocations are within or close to Hub Towns or Service Centres. A strategic employment site allocation on previously-developed land at Trecwn (Policy SP 3) and employment allocations at Scleddau and Goodwick (Policy GN.5) would meet employment needs in the north of the county close to Fishguard. The proposed allocation of an employment site in Narberth is supported as it addresses a gap in provision in this small town with a large rural hinterland. The chosen site represents a logical extension to a modern industrial estate to the west of Redstone Road. Highway constraints do not appear to be significant enough to prevent the site being delivered. Amendments are required to Policy GN.5 and the Proposals Map as a result (**MAC48**). A larger strategic allocation in Narberth would not fit with the Plan strategy. The allocations, taken together with the existing pattern of employment and criteria-based policies of the Plan, would ensure a reasonable degree of synergy between the distribution of housing and employment growth.

3.14 The Deliverability Study¹⁷ predicts reasonably even growth and geographical distribution across the Plan period. Most growth early in the Plan period would derive from existing commitments with allocations contributing more in the later period beyond 2015. Whilst current economic conditions are likely to impact on delivery in the short term, the Plan seeks to make provision for development across the Plan period.

Social and Physical Infrastructure

3.15 Policy GN.3 of the Plan requires development to fund new or improved infrastructure, services or community facilities that are needed to make development acceptable and are related in scale and kind to the development, assuming that the provision is not already programmed by the provider. In this regard, infrastructure providers have been involved in preparing the Plan. Bodies such as Welsh Water have taken into account the Plan in drawing up their future programmes, particularly those relating to sewage infrastructure and water resources where there are current capacity issues. However, the Deliverability Study indicates that no allocations have infrastructure or other constraints which are classified as High or Severe.

¹⁶ PPW Technical Advice Note (TAN) 6: Planning for Sustainable Rural Communities (Paragraph 2.2.3)

¹⁷ Site Deliverability Study – Final Report - March 2012

3.16 The Council propose that Policy GN.3 is amended to identify that if all contributions cannot be reasonably required then priorities would be determined on a case by case basis, although with residential allocations affordable housing would normally be the priority (**MAC42**).

I consider that the policy, as amended, reflects a realistic and flexible approach to the provision of infrastructure and would accord with the provisions of Circular 13/97 – Planning Obligations and the Community Infrastructure Levy (CIL) Regulations 2010. The revised policy would ensure that the cumulative impact of the Plan’s policies would be taken into account in considering the viability and deliverability of development. The Reasoned Justification (RJ) to Policy GN.3 is proposed to be amended to reflect the possibility of CIL being introduced in Pembrokeshire during the lifetime of the Plan (**MAC43**). The Deliverability Study would form the basis for any Charging Schedule for CIL. Additional clarification will be provided by updated Supplementary Planning Guidance (SPG) - Planning Obligations.

Conclusion

3.17 Subject to the changes proposed, the development strategy has a sound basis and is consistent with national policy and the WSP. It satisfies the consistency, coherence and effectiveness tests of soundness.

Recommendation

3.18 That in order to make the Plan sound the following changes are required:

MAC09, MAC21, MAC42, MAC43, MAC48, MAC117, MAC119

Inspector Change IC01

4 Transport and Accessibility

- 4.1 The Plan strategy and settlement hierarchy are based on the objective of ensuring that everyone has reasonable access to goods and services. However, as Pembrokeshire is relatively isolated from the rest of Wales and the UK and the settlement pattern is dispersed, there will be a continued heavy reliance on the private vehicle. Notwithstanding this inevitability, it is important that the Plan emphasises accessible locations and sustainable transport and in this respect a change is proposed to Policy GN.1 (General Development Policy) to include an appropriate criterion (**MAC37**).
- 4.2 In this context the Plan seeks to capitalise on those locations that are served by a choice of transport modes. All the Hub Towns have access to regular bus services and are close to rail connections. Housing allocations in the Hub Towns would generally be within walking or cycling distance of town or local centres and employment opportunities. Higher density housing developments of at least 30 dwellings per hectare are proposed in Hub Towns. The strategic employment allocations are close to bus services. The Service Centres of Kilgetty and Johnston have railway stations. All Service Centres are served by regular bus routes along the Strategic Road Network and have bus links to surrounding rural settlements.
- 4.3 In designating Service Villages, the Plan takes into account access to public transport as well as availability of services in the settlement. The majority of new development in the rural areas will be located in those settlements which have relatively good accessibility by non-car modes when compared to the rural area as a whole¹⁸. Large and Small Local Villages are not all served by public transport. This was an important factor in limiting development (see Rural Facilities Survey Report).
- 4.4 Policy SP 10 of the Plan supports improvements to transport infrastructure that would increase access to employment, services and facilities. Policy GN.38 sets out criteria that would need to be satisfied in considering transport network improvements and safeguards certain transport routes and improvements that are programmed. Programming details are included in Appendix 6 to the Plan. The majority of the schemes are identified in the Regional Transport Plan for South West Wales – 2010 – 2015 (RTP). The schemes include bus, rail and shared path improvements in addition to highway schemes.
- 4.5 Some of the schemes listed by Policy GN.38 would be likely to be necessary or desirable to allow particular allocations to come forward. For example the Blackbridge Access Improvement and Waterston Bypass would ensure suitable access to the Blackbridge Strategic Employment Site allocated by Policy SP 3. The Pembroke Community Regeneration Project Phase 2 (Bush Hill to Monkton bypass route) would significantly improve road access to the housing allocations in Monkton. The Plan does not impose a requirement that the transport schemes are

¹⁸ PPW Paragraph 4.7.7

implemented alongside the allocations. However, in assessing development proposals, the Council would need to be satisfied that a number of policies of the Plan were met, including Policies SP 1 and GN.1. In this respect I consider that sufficient safeguards are included within the Plan to ensure that necessary transport infrastructure is in place. Indicators are included within the Monitoring Framework relating to the delivery of safeguarded transport schemes. At the same time the Plan is not too prescriptive and allows for changed circumstances affecting the allocations or transport schemes.

- 4.6 The Blackbridge and Waterston Route is being progressed through a recognised appraisal method¹⁹. The appraisal has recommended changes to the route which need to be incorporated into the Plan. The revised route would make better use of the existing highway network and has more regard to the location of existing dwellings in the vicinity. I consider that the change to the Proposals Map (**MAC124**) would make the Plan sound in respect of this proposal, albeit that the precise details would require further appraisal at project stage. Policy GN.38 is proposed for amendment so that the need for compliance with wildlife legislation in the implementation of the proposal is made explicit (**MAC 106**).
- 4.7 A park and ride scheme is needed to serve Tenby²⁰. The scheme is listed in Policy GN.38 and included in the RTP. Grant funding has been obtained for a sustainable access study for the Tenby area as a precursor to the implementation of a park and ride. The park and ride facility could be within the PCNP or in the Plan area. The scheme is not at a stage where a site can be selected so the suggestion of a park and ride facility at New Hedges is premature.

Recommendation

- 4.8 That in order to make the Plan sound the following changes are required:

MAC37, MAC106, MAC124

¹⁹ WELTAG – Welsh Transport Planning and Appraisal Guidance

²⁰ Located within the PCNP

5 The Economy

Employment Land Allocations and Policies

- 5.1 The suite of allocations - strategic employment sites, local employment sites, areas for port and energy related development and mixed-use sites - would build on existing provision²¹ to ensure a range of sites and locations to meet the County’s needs over the Plan period. The allocations are supported by criteria-based policies which allow employment proposals on unallocated land (Policy GN.6), protect employment sites (Policy GN.8) and allow existing employment sites to extend (Policy GN.9). It is recommended that Policy GN.6 be amended to ensure that a sequential approach to unallocated land is followed (**MAC49**). The revised policy would steer employment allocations to the more appropriate locations, consistent with other policies of the Plan and national policy²². The RJ to Policy GN.8 requires amendment to clarify that it is Business Class Uses (B1, B2 and B8) that are protected (**MAC54**).
- 5.2 The areas for port and energy related development and strategic employment sites (Policies SP 2 and SP 3) would be the main locations for significant inward investment. The recent designation of the Haven Waterway Enterprise Zone will assist in this respect. The Council accepts that some of the sites, such as Blackbridge and Trecwn, are aspirational but the Plan strategy is not reliant on their delivery. The criteria-based policies would also assist in encouraging economic growth. The local employment sites allocated by Policy GN.5, together with the criteria-based policies, provide for local employment needs. Changes are proposed to Policies SP 3 and GN.5 to specify the type of uses (B1, B2 and B8) that would generally be appropriate on allocated sites (**MAC13** and **MAC47**).
- 5.3 Non-housing allocations in the JUDP have been reviewed as recommended by PPW. Some employment allocations have changed to housing sites. Mixed-use sites have been allocated on some previously-developed land which has proved difficult to develop for solely employment use. However, one of the main purposes of the allocations under Policy GN.7 is to facilitate employment development. As such it is proposed to revise the policy to ensure that a considerable proportion of the mixed-use development is employment related (**MAC50**). Further explanation on the purposes of mixed use allocations and how they are to be delivered is contained in a revised RJ to the policy (**MAC51**, **MAC52** and **MAC53**). Reference is now made to how mixed-use proposals will be considered on non-allocated sites to ensure that the approach is clear (**MAC C**).
- 5.4 Pembroke Dock and Milford Dock contain a mix of uses. However, the docks are not typical of the vacant problematic sites identified by Policy GN.7. It is appropriate that Policy SP 2 applies to these areas, albeit with

²¹ See Employment Land Survey 2011

²² PPW Paragraph 7.1.4

a recognition that the docks have particular characteristics which may make them suitable for other uses in addition to those specified by Policy SP 2. The RJ to Policy SP 2 is recommended for change to reflect these circumstances (MAC12). In addition the area at Milford Docks subject to Policy SP 2 is to be extended to cover the whole of the dock (**MAC120**).

- 5.5 The employment policies will ensure a reasonable supply of suitable sites, providing the choice and flexibility required by PPW²³. Development would be achieved predominantly by the private sector but with some public sector intervention supported by grant funding.

Retailing

- 5.6 The retail hierarchy identifies Haverfordwest as a Sub-Regional Town Centre. Pembroke Dock, Pembroke, Milford Haven, Fishguard and Narberth are defined as Town Centres. Goodwick, Neyland, Crymych, Letterston, Johnston and Kilgetty are shown as Local Retail Centres. The hierarchy is consistent with the role and function of these centres. The hierarchy is supported by a robust evidence base²⁴. Although Kilgetty has a significant convenience store allocation, this is a reflection that the development will serve a relatively wide area of South-East Pembrokeshire rather than that Kilgetty itself should move up the hierarchy.
- 5.7 Provision is made for additional comparison goods floorspace in Haverfordwest to support its sub-regional role. A further comparison goods allocation at Wilkinson’s Car Park would lead to the loss of town centre parking. Moreover, there is insufficient evidence that the site is deliverable. There is no retail need for a large out-of-centre foodstore at Slade Lane South and there is insufficient evidence to indicate that it is required to deliver housing.
- 5.8 The modest town centre allocations in Pembroke Dock, Fishguard and Narberth are well-related to the size and other characteristics of the respective towns. Pembroke Dock would benefit qualitatively from investment in the St Govan’s Centre. Fishguard suffers from significant leakage of both convenience and comparison shopping. Permission exists on the allocated former primary school site for a modest foodstore for which there is a quantitative and qualitative need. In Narberth the development of the former primary school with comparison and convenience units, the frontage of which connects with the town centre, would consolidate the town’s niche retail role. A larger site extending onto the public car park is not needed and is unlikely to be delivered.
- 5.9 Benefits would arise for Milford Haven Town Centre if linkages between the centre and the Docks and the Marina could be reinforced. The proposed changes to the RJ to Policy SP 2 acknowledge the benefits that could be brought about by transformative development proposals (MAC12). The allocation for a food store at Kilgetty, whilst larger than

²³ Paragraph 7.2.1

²⁴ County Wide Retail Study March 2010 and Retail Background Papers

would normally be expected for a Local Retail Centre, reflects an existing commitment and meets a proven need for convenience floorspace in the catchment, which includes parts of the PCNP. No suitable sites exist in centres higher up the hierarchy to meet the identified level of quantitative need for convenience shopping.

5.10 An additional or alternative convenience store allocation on the Old Brewery Site in Narberth is not considered appropriate. The site is not well-related to the town centre. The need for further convenience shopping in South-East Pembrokeshire beyond the allocations has not been demonstrated. Retail development at New Hedges would not follow the sequential approach for the selection of sites²⁵.

5.11 The retail hierarchy and retail allocation policies of the LDP (Policies SP 4 and GN.13) are supported by policies which promote town centre development and control out-of-centre retailing (Policies GN.12 and GN.14). In relation to Policy GN.15, a proposed change clarifies that small scale retail facilities should be located within settlement boundaries (**MAC69**). Local retail centres are not given spatial definition but shops and related uses are protected by Policy GN.33, as confirmed by **MAC70**. A number of amendments are proposed to these criteria-based policies to provide clarity (MAC64, MAC65, MAC66, MAC67 and MAC68).

Tourism

5.12 Tourism makes a significant contribution to the economy of Pembrokeshire. The Plan recognises the importance of the visitor economy but with a focus on providing a strong and diverse year round industry in a quality environment. In this context Policy SP 5 allows development related to the visitor economy in sustainable locations that contributes to the diversity and quality of accommodation and attractions. A change to the policy that ensures consistency with other policies of the Plan is supported – the more stringent test of “enhance the environment” is to be replaced with “respect and protect” (**MAC15**). The revised policy is consistent with PPW and the objectives of the WSP.

5.13 Policy GN.16 permits well-located visitor attractions and leisure facilities. It is appropriate that the policy also supports extensions to existing facilities of appropriate scale so that it is consistent with other economic policies of the Plan such as Policy GN.9 (Extensions to Employment Sites) and Policy GN.17 (Self-Catering and Serviced Accommodation). A change to Policy GN.16 is proposed to achieve this consistency (**MAC71**).

5.14 Caravan and camping sites provide a significant proportion of the available accommodation for the visitor to Pembrokeshire. However, some sites are visually intrusive. In the south-east of the County there are concentrations of sites which collectively have a significant impact on the landscape. The suite of LDP policies apply different criteria to proposals for new or extended touring caravan, camping and static

²⁵ PPW Paragraph 10.2.11

caravan sites depending on their location relative to existing settlements and whether or not they are in the south-east Community Council areas. To my mind the policies achieve an appropriate balance between encouraging such accommodation, allowing site improvements and protecting the landscape. Policy GN.19 restricts increases in static caravan numbers, given the surplus of such provision²⁶, but does not prevent the enlargement of sites or the upgrading of pitches in most parts of the County. Amendments are proposed to Policies GN.18 and GN.19 so that the similarities and differences between the approaches to touring caravan/camping sites and static caravan sites are clear (**MAC77**, **MAC79** and **MAC80**). Policy GN.21, which deals with holiday occupancy conditions, is not necessary as it repeats national policy²⁷ (**MAC82**). I support its deletion. However, reference is still required to the use of occupancy conditions in appropriate circumstances (**MAC81**).

The Rural Economy

5.15 The Plan allocates land for employment development adjacent to the rural Service Centres of Crymych and Letterston and at other locations which will serve the rural areas of the County, including those with high incidences of Welsh speakers. In particular allocations in Templeton and Narberth are well-located for the eastern part of the County. Allocations in Trecwn, Scleddau and Goodwick will assist the economy in the north of the County. The Plan identifies a diverse range of sites. The allocations are supported by criteria based policies (Policy SP 15 and Paragraph 5.1 of this report refer).

5.16 Further support for the rural economy is provided by policies which encourage farm diversification and the conversion of agricultural buildings for employment related activities (Policies GN.10 and GN.11 respectively). The need for new buildings to be sensitively located and designed is to be highlighted with a cross-reference to TAN 6 within Policy GN.10 (MAC61). These policies are generally consistent with the national approach to rural areas²⁸.

²⁶ Background Paper: Static and Touring Caravan and Camp Sites May 2010

²⁷ TAN 13 – Tourism Paragraph 15

²⁸ PPW Paragraphs 7.3.2 and 7.3.3

Recommendation

5.17 That in order to make the Plan sound the following changes are required:

MAC13, MAC15, MAC47, MAC49, MAC50, MAC51, MAC53, MAC54, MAC69, MAC70, MAC71, MAC77, MAC79, MAC80, MAC81, MAC82, MAC120, MAC C

5.18 The following minor changes which the Council proposes to the submitted Plan are also endorsed, since they improve the Plan’s clarity, coherence and consistency of interpretation:

MAC12, MAC52, MAC61, MAC64, MAC65, MAC66, MAC67, MAC68

6 Minerals and Waste

Minerals

- 6.1 Minerals Technical Advice Note 1 (MTAN1) on Aggregates requires that minimum landbanks are maintained throughout the period of a LDP. The required landbanks are a 10 year supply of hard rock and a 7 year supply of sand and gravel. The requirement for landbanks does not apply in National Parks which are only expected to contribute to supply in exceptional circumstances.
- 6.2 In the case of Pembrokeshire as a whole, a significant proportion of existing reserves in the County are located in the PCNP. The Council has an agreement with the PCNPA to calculate the reserve on a countywide basis. Taking into account the most up to date figures²⁹, the combined landbank is about 36 years for hard rock and 18 years for sand and gravel in 2012 with some 29 years hard rock supply and 8 years sand and gravel supply in 2021 (**MAC16**). Although there is a presumption against relying on the National Park, working quarries exist there with reserves. Two permissions have been granted for sand and gravel quarry extensions in the PCNP in recent years. Moreover, there has been a lack of demand for sand and gravel sites in the Plan area, possibly due to the availability of marine-dredged sources. The Minerals Industry has not come forward with suggested sand and gravel allocations. The Council now propose an Area of Search for future sand and gravel working consistent with the safeguarded mineral resource which is explained in the RJ to Policy SP 6 (**MAC18**). The Proposals Map is to distinguish between sand and gravel, hard rock and coal reserves (MAC126).
- 6.3 The Plan’s approach is acceptable in the circumstances. However, it is important that the Plan recognises that the minerals resource in the National Park cannot be relied upon in the longer term. This was highlighted in the Regional Technical Statement for Minerals October 2008. MTAN1 advises that allocations for aggregates in the NP are inappropriate. In this respect it is proposed that the RJ to Policy SP 6 and the Monitoring Framework is revised to ensure that there is a commitment to finding alternative non-National Park locations for minerals towards the end of the Plan period within the County and/or elsewhere in South West Wales (**MAC19, MAC119**).
- 6.4 Prior extraction of the mineral resource is sought where new development is permitted (Policy GN.23). The proposal to amend Policy GN.23 and its RJ to clarify when prior extraction would be appropriate, taking into account viability, environmental and other planning considerations, is necessary (**MAC84, MAC85**). Proposals for mineral working are to be considered against a criteria-based policy (Policy GN.24). In this regard, revised working of limestone at Blaencilgoed Quarry would be considered against such criteria. An allocation would be contrary to the advice in MTAN1 as a substantial hard rock land bank exists. Policy GN.25 encourages the use of recycled waste materials and

²⁹ Mineral Landbank Calculations Update July 2012

secondary aggregates in accordance with MTAN1. The overall policy approach to minerals is sound, subject to the changes highlighted above.

Waste

- 6.5 The Plan includes a strategic policy (SP 11) which requires the production of waste to be minimised. Where waste does occur the emphasis is on re-use or recovery rather than disposal. The approach is consistent with European and UK legislation and follows the provisions of the South West Wales Regional Waste Plan 1st Review August 2008 (RWP).
- 6.6 Locations where the in-building handling and treatment of waste would be acceptable are allocated by Policy GN.39. These sites are generally the larger employment allocations and existing major energy installations, offering a choice of sites where there is sufficient land area to separate waste operations from sensitive uses. The majority of these sites were identified as having potential for in-building waste in the RWP. This is clarified by a proposed change to the RJ to Policy SP 11 (MAC27). The sites would provide the capacity expressed in tonnage which is a requirement of emerging national waste policy³⁰. Some of these sites could provide installations with the capacity to serve more than one Local Authority area. It is recommended that the RJ to the policy is revised to clarify that the sites would not be given over entirely to such uses (MAC109). A criteria-based policy for considering waste proposals is also included in the Plan (Policy GN.40). The policy requires amendment to ensure consistency with TAN21 – Waste (**MAC110**).
- 6.7 Policy GN.39 also allocates land for an extension to the civic amenity site at Winsel to meet an identified need in the Haverfordwest area for additional capacity. There is also a requirement for a new civic amenity site in the south-east of the county due to the constrained size of the existing facility at the Salterns, Tenby. A site at Kingsmoor Common near Kilgetty was identified in the Deposit Plan but deleted at FC stage due to common land and access constraints. An alternative site is being pursued in the National Park close to Tenby, the largest town in the catchment. However, at this stage there is insufficient certainty that the site is deliverable. It is proposed to revise the RJ to Policy GN.39 to explain the current position (**MAC108**). In addition the Monitoring Framework is to incorporate an indicator to measure progress towards finding the new site (**MAC119**). If the site found is in the Plan area a proposal would be judged against Policy GN.40. This is considered to represent an acceptable approach in the circumstances.
- 6.8 Energy recovery is preferable to disposal. The RWP includes energy recovery within the “Preferred Options” of its Technology Strategy. An Energy from Waste (EfW) facility would be provided in partnership with other organisations on a regional basis. This approach is supported by Welsh Government (WG) funding which is channelled through procurement hubs. An EfW facility would need to be located near an end-

³⁰ Collections, Infrastructure and Markets Sector Plan – July 2012

user for the energy produced to satisfy the proximity principle.

6.9 The allocation of an EfW plant on land adjacent to the Milford Haven Murco Refinery under Policy GN.39 seeks to provide a facility in the above context. However, the need may be met elsewhere in the region. Moreover, although the Murco Refinery is one of the largest industrial energy users in South West Wales³¹, the Valero Refinery to the west of Pembroke is recorded as a significantly larger energy user. Furthermore, Policy GN.39 identifies large areas of land for the in-building handling and treatment of waste, which would include EfW. Locations listed include the Murco and Valero Refineries, Pembroke Power Station and Petro Plus/Dragon LNG which have site areas ranging from 120ha to 215ha. It is accepted that significant areas of operational land at these sites will not be available for waste treatment. However, the inclusion of the sites within Policy GN.39 suggests that land is likely to be available for an EfW development at one or more of the sites. This is acknowledged by Annex C to TAN 21 and the RWP (Paragraph 11.1.2). To my mind there is insufficient justification for the allocation of the greenfield site for EfW. Alternative options exist, should the procurement process lead to a site in Pembrokeshire. Therefore, it is recommended that Policy GN.39, Paragraph 6.160 and the Proposals Map be amended to delete reference to the Energy from Waste allocation adjoining the Murco Refinery (WST/LDP/086/01) (**IC02**). Any EfW proposal in Pembrokeshire would be subject to detailed evaluation against Policy GN.40 taking into account the processes involved and would also require Environment Agency Wales (EAW) permits under Integrated Pollution Prevention and Control.

Recommendation

6.10 That in order to make the Plan sound the following changes are required:

MAC16, MAC18, MAC19, MAC84, MAC85, MAC108, MAC110, MAC119

Inspector Change IC02

6.11 The following minor changes which the Council proposes to the submitted Plan are also endorsed, since they improve the Plan’s clarity, coherence and consistency of interpretation:

MAC27, MAC109, MAC126

³¹ Figure 20 of the RWP

7 Housing

The Level of Housing Growth

- 7.1 The LDP aims to deliver around 5700 homes in the Plan period. Policy SP 2 has been amended to specify an approximate number of dwellings rather than the precise figure contained in the submitted Plan (**MAC20**). It is now proposed that the housing requirement is based on the 2008-based household projections, which is appropriate as it reflects Welsh Government (WG) advice that the latest such figures should be used³² (**MAC02**). Household growth was converted into a dwelling requirement using a multiplier of 1.08. This convertor rate is higher than that used by most Welsh Councils but is justified due to the greater proportion of second and holiday homes than can be generally found elsewhere.
- 7.2 The actual housing supply figure contained within Policy SP 7 and detailed within Table 2 of Appendix 3 of the Plan is some 30% higher than the housing requirement. The reasoning for the supply figure is contained within an amended paragraph 5.38 which adds clarity to the Plan (**MAC21**). In my view this level of over-supply is acceptable, having regard to the number of existing planning permissions that are unlikely to be implemented and the fact that some allocations will not be taken up, particularly if current market conditions continue well into the Plan period. In addition over-supply will assist in ensuring a 5 year housing land supply, gives a choice of sites to both developers and households in testing times and is likely to deliver more affordable housing. The PCNPA has also over-provided for housing in its LDP. Housing distribution is dealt with at Section 3 of this report.

Affordable Housing

- 7.3 The need for affordable housing is acute across the whole county. The Local Housing Market Assessment (LHMA), updated in 2012, indicated a need for 1656 additional affordable dwellings per annum over 10 years to make up the shortfall. PPW³³ advises that the authority-wide target for affordable housing should be based on the LHMA. However, the Council considers that the figures identified by the LHMA represent an over assessment and are unrealistic in terms of delivery. The Council has instead used the Common Housing Register as the main evidence base for arriving at a target which is explained in an amended RJ to Policy SP 8 (**MAC23**). A similar approach was used in the PCNP LDP. Analysis of the Register identified that in June 2010 there were 2427 households in need of affordable housing³⁴.
- 7.4 The Deposit Plan includes a target of 1450 new affordable dwellings which was considered realistic in 2010, albeit well below the level of need. Since then further viability work using the 3-Dragons Development Appraisal Toolkit was undertaken in the summer of 2012 to assess the

³² PPW Paragraph 9.2.2

³³ Paragraph 9.2.16

³⁴ Background Paper: Statement of Affordable Housing Need: February 2012

impact of the downturn in the housing market. As a result a change is proposed to Policy SP 8 such that the Plan now aims to deliver at least 980 new affordable homes (**MAC22**).

- 7.5 Affordable housing is to be sought on all housing developments. In arriving at the target, the Council has assessed the number of homes that are likely to be delivered from the various sources, including housing allocations, windfalls, commuted sums and exception sites. This is summarised in a revised RJ to Policy SP 8 (**MAC24**). A new Appendix 4 is proposed to show sources of delivery (**MAC118**). The assessment takes into account the most recent viability testing³⁵. The testing has revealed variations across the county in terms of the level of affordable housing that can be delivered. This is reflected in proposed changes to Policy GN.28 (Residential Allocations) where the indicative affordable housing requirement would range from up to 5% to 25% depending on the area of the county (**MAC26** and **MAC91**). So far as the target for windfalls in towns, service centres and service villages is concerned, Policy GN.29 is proposed for revision so that the Plan seeks 10% of housing as affordable (**MAC92**). A significant proportion of the new housing in Large and Small Local Villages would be affordable – 50% in Large Local Villages and 100% in Small Local Villages. The Council anticipate that homes in Local Villages would come forward on land owned by locals, for example family members, who would be prepared to make land available at a low cost. A significant proportion of the construction is likely to be self-build projects using local labour. Although this is a relatively untested approach, normal economic viability considerations are unlikely to apply.
- 7.6 Based on the evidence before me the affordable housing target and the policies that will seek to deliver affordable homes are challenging but appropriate. The approach is one that is Plan rather than market led, reflected in the use of lower land values in the viability calculations than those currently sought by landowners. Flexibility is to be built into Policy GN.29 by the introduction of a mechanism whereby sustained improvements in the financial viability of development will lead to the Council seeking a higher affordable housing contribution (**MAC92**). Moreover, the Plan recognises that the targets are the starting point for negotiating affordable housing contributions. Overall the target and policies achieve an appropriate balance between meeting need and site viability as required by TAN 2 – Planning and Affordable Housing³⁶. I support the proposed changes to the affordable housing policies.

Housing Delivery

- 7.7 The over-supply of housing built into the Plan introduces some flexibility in terms of delivery so that if some sites do not come forward it need not be significant for the implementation of the Plan. That said the assessment of site allocations through the Deliverability Study indicates that there is a realistic prospect of all sites being delivered during the

³⁵ Updated Affordable Housing Viability Assessment 2012, Further Analysis of Viability Appraisals October 2012

³⁶ Paragraphs 9.1 and 10.4

Plan period.

- 7.8 The Council's most recent agreed Joint Housing Land Availability Study³⁷ had a base date of 1 April 2011. The county as a whole had a 4.7 year land supply when set against the JUDP, a shortfall against the requirement for a 5 year housing land supply. However, the figures were affected by the number of sites moving from Category 2 to Category 3(i)³⁸ due to the economic climate. Moreover, the Deliverability Study predicts a land supply of 7.6 years for the first 5 years of the Plan post-adoption which would accord with national policy³⁹.
- 7.9 Some of the larger sites are expected to deliver significant numbers of houses during the Plan period, notably Slade Lane South and Shoals Hook Lane, Haverfordwest (512 and 277 units respectively) and Maesgwynne Farm, Fishguard (399 units). Delivery would be assisted by proactive planning and intervention by the Council. In this respect I welcome the commitment to further refine the Development Sites SPG following adoption of the Plan and to produce Site Development Briefs for the larger sites.
- 7.10 The Monitoring Section of the Plan is proposed to be amended to incorporate triggers relating to the adequacy of the land supply and commencement of the major allocations (**MAC119**). These changes are supported as they provide clearer mechanisms for housing delivery.

Other Housing Policies

- 7.11 The Council has identified a significant number of small settlements where infilling is appropriate, with an emphasis on affordable housing. Infilling elsewhere in the rural area would consolidate the considerable number of small groups of houses dispersed throughout the rural area, impact adversely on the landscape and encourage unsustainable travel patterns. Therefore, infilling is not permitted outside settlement boundaries. However, rural enterprise dwellings are allowed by Policies SP 16 and GN.27 if meeting the tests set out in TAN 6.
- 7.12 TAN 6⁴⁰ indicates that the residential conversion of rural buildings may have an adverse economic impact. As a result it can be appropriate to restrict such use. However, the Council considers that there are a finite number of such opportunities. Sensitive conversions will retain valuable buildings in the rural scene and provide additional rural housing. Restricting conversions to affordable housing is not realistic due to the high costs of such works but conversions will still need to contribute to affordable housing by commuted sums required by Policy GN.29. Therefore, the conversion of traditional and historic buildings in the countryside to dwellings is permitted by Policies GN.11 and GN.27. The

³⁷ Joint Housing Land Availability Study June 2012

³⁸ Definitions adopted by TAN 1 – Joint Housing Land Availability Studies (Paragraph 7.3.2)

³⁹ PPW Paragraph 9.2.3

⁴⁰ Paragraph 3.5.1

approach is justified.

- 7.13 There is a need for housing for older people in the county as evidenced by the Council’s Local Housing Strategy and LHMA. There is a particular need in the Tenby area due to the high proportion of the population over 65 and the lack of any public sector schemes coming forward. In response to this need the Council has allocated a site for an additional care facility adjacent to Park House, New Hedges through Policy GN.31. Although the site is outside any settlement boundary, it would relate to an existing large building complex at Park House, would complement the existing provision and would satisfy a need which is unlikely to be met by the public sector. However, there is insufficient justification to support the alternative site on adjacent land which, if developed, would lead to a coalescence of the Park House complex with New Hedges.
- 7.14 Policy GN.31 also has criteria against which proposals for new or extended specialist accommodation will be considered. The policy, as currently worded, is inconsistent with other policies of the Plan which allow comparable forms of built development outside settlement boundaries where a need has been demonstrated e.g. Policy GN.30 relating to affordable housing exception sites. As a result I recommend changes to require that new facilities are within or immediately adjoining a settlement boundary, rather than well-related to the boundary. So far as extensions to specialist accommodation are concerned, the wording of Criterion 2 of Policy GN.31 is consistent with that used elsewhere in the Plan where policies deal with extending existing built development, including that which is located in the countryside – Policies GN.16 (as revised) and GN.17 for example. For both new facilities and extensions, a need for the facility should be demonstrated (**IC03**).

Gypsies and Travellers

- 7.15 The Plan also considers the specific accommodation requirements of gypsies and travellers. The Council’s Gypsy Traveller Accommodation Need Assessment (2010) (GTANA), updated in 2012, demonstrated a need for between 19 and 68 additional residential pitches in the period of the Plan up to 2016, building on Pembrokeshire’s high number of existing authorised pitches. This identified need includes the small need arising from the PCNP. The large range of potential need identified is a reflection of uncertainties about the exact nature of future need; whether families are able to move into “bricks and mortar” if expressing a wish to do so; and variations in the waiting list for pitches. No assessment of need has been undertaken for the period beyond 2016.
- 7.16 In response to the need up to 2016 the Council has allocated land under Policy GN.32a to enable existing public sites at Kingsmoor Common, Kilgetty and Castle Quarry, Monkton to be extended which would result in 23 additional pitches. Planning permission has been obtained for the Castle Quarry extension. Assessments have been undertaken as a precursor to submitting a planning application for the Kingsmoor Common extension. Concurrently extinguishment of common land rights is being sought. Grant funding from WG is available for both sites. The

evidence indicates that both sites are deliverable early in the Plan period.

- 7.17 The above allocations meet the minimum requirement for pitches up to 2016. However, the Council has been seeking an additional site in the area of greatest need where specialist services are in place – the A477 corridor between Pembroke Dock and Kilgetty – so that it can meet the mid-range need figure. The Council has been unable to find a suitable site. Sites put forward by representors in Haverfordwest and near Llanteg are unsuitable and do not meet this specific need. The potential shortfall is to be addressed by a number of methods. The planned extensions on the allocated sites allow for generously sized pitches. The pitches may be able to provide space for more than one household recorded as being in need e.g. extended family groups. The Council will continue the search for sites. A chosen site would be assessed against criteria-based Policy GN.32b. Similarly proposals for new private sites would be judged against the same policy. It is proposed to amend the policy to incorporate considerations of local arising need and local connections to ensure consistency with Circular 30/2007⁴¹ (**MAC93**). It is also suggested that the RJ to the policy is revised to ensure consistency with the Circular and in particular Annex B – Good Practice – Criteria (MAC94, MAC95 and MAC96). These changes, which would assist in making additional provision for gypsies and travellers, are supported.
- 7.18 In terms of the need beyond 2016, the Council intend to undertake a further accommodation assessment within 2 years of Plan adoption. The results of the assessment would be fed into Plan review. However, it is unlikely that need arising during the second period of the Plan would be as high as that identified up to 2016 as the initial GTANA captured a backlog of need.
- 7.19 The monitoring framework of the Plan requires revision to take into account the latest information. Indicators, policy targets and triggers are proposed relating to the number of pitches provided by 2015; the need for a new GTANA by the end of 2014; and progress towards meeting post-2014 and 2016 need (**MAC119**). With these and the other necessary changes highlighted, the Plan contains appropriate measures to ensure that the needs of gypsies and travellers are met over the Plan period.

⁴¹ Welsh Government Circular 30/2007 – Planning for Gypsy and Traveller Caravan Sites (Paragraph 29)

Recommendation

7.20 That in order to make the Plan sound the following changes are required:

MAC02, MAC20, MAC21, MAC22, MAC23, MAC24, MAC26, MAC91, MAC92, MAC93, MAC118, MAC119

Inspector Change IC03

7.21 The following minor changes which the Council proposes to the submitted Plan are also endorsed, since they improve the Plan’s clarity, coherence and consistency of interpretation:

MAC94, MAC95, MAC96

8 Community Facilities and Open Space

Community Facilities

8.1 The Plan recognises that community facilities are essential to community cohesion. Policy GN.33 of the Plan supports proposed community facilities which are within or well-related to a settlement and also seeks to protect existing facilities. The Plan also allocates land to allow the provision of new and extended schools, the enlargement of Withybush Hospital and the extension of a number of cemeteries. It is proposed that the footnote to the policy is amended to clarify that local shops are considered to represent community facilities (**MAC97**). The RJ to the policy, referring to the evidence that will be needed to demonstrate that a facility is no longer required, is proposed for revision to incorporate a marketing requirement for privately owned facilities such as shops and public houses (**MAC98**). These changes are supported.

Open Space

8.2 Open space, including areas with both recreational and amenity value, are protected by Policies GN.34 and GN.35 of the Plan as required by PPW⁴². The Proposals Map identifies the larger areas of open space. However, all such areas, even if not shown on the Proposals Map, are protected by the policies. The protection extends to village greens. School playing fields are not normally open to the general public so they are protected by Policy GN.33 rather than the open space policies. Amendments are required to areas subject to open space protection policies in Neyland, Fishguard, Kilgetty, St Florence and St Dogmaels to reflect the position on the ground (**MAC121, MAC122, MAC123, MAC125 and MAC128**).

8.2 PPW⁴³ indicates that the development plan should set standards of provision for sport and recreation so that local deficiencies can be met through the planning process. TAN 16 – Sport, Recreation and Open Space advises that the LDP should set out clear guidance on the scale and form of open space and recreation facilities sought in conjunction with major new residential and mixed-use allocations⁴⁴. The Council’s Open Space Assessment 2010 forms the basis for identifying the type of open space that is needed in a particular area. For example there is a deficit of equipped play areas in many areas. Milford Haven’s open space provision is significantly below the 2.4 ha standard per 1000 population⁴⁵. Many rural settlements have provision below the standard. However, the Plan does not set standards of provision or include a policy that requires larger developments to provide open space to a particular standard. Instead the Council rely on Policy GN.34 to encourage the creation of new recreation areas and Policy GN.3 (Infrastructure and New Development) to deliver open space along with other facilities in conjunction with new

⁴² Paragraph 11.2.3

⁴³ Paragraph 11.2.2

⁴⁴ Paragraph 3.16

⁴⁵ Field in Trust “Six Acre Standard”

developments.

8.3 The Council’s approach is realistic in that Policy GN.34 will support efforts by the Council, other public bodies, voluntary groups and the private sector to provide open space to meet deficits without imposing requirements which are undeliverable. Policy GN.3 balances the need for facilities in association with new development, including recreational and amenity open space, against viability considerations. The contributions that may be necessary to make a development acceptable are not prioritised other than affordable housing for residential developments. The policy recognises that priorities may vary depending on the location of the site within the county. In considering priorities, the assessment of existing recreation provision and the need generated by the scheme will be factors in determining the amount and type of open space provision that should be made. In circumstances where there is a deficit in provision it is reasonable to assume that open space provision would be a greater priority than some other facilities. It is intended to produce an SPG on Developer Contributions to set out more detailed requirements. The policy approach is not as prescriptive as that suggested by national policy but is capable of delivering appropriate open space in association with new developments. An indicator is to be included in the Monitoring Framework to ensure that the open space provision does not fall significantly below the standard sought by the Developer Contributions SPG (**MAC119**).

8.4 Proposed changes to Policy GN.34 delete “inappropriate development” and remove reference to the applicant demonstrating that a recreation area has no value (MAC99). The former has a specific meaning relating to Green Belts and is not relevant in this context. The latter is a matter for the local community and Council to determine, not the applicant. Both changes make the policy more coherent and are endorsed. In relation to Policy GN.35 there is a need for it to be demonstrated that development adversely affecting amenity open space cannot be accommodated elsewhere, which is addressed by **MAC100**.

Recommendation

8.5 That in order to make the Plan sound the following change is required:

MAC97, MAC98, MAC100, MAC119, MAC121, MAC122, MAC123, MAC125, MAC128

8.6 The following minor change which the Council propose to the submitted Plan is also endorsed, since it improves the Plan’s clarity and coherence:

MAC99

9 The Countryside, Environment, Renewables and Sustainable Design

The Countryside

- 9.1 The Plan as a whole directs development to existing settlements through its allocations and criteria-based policies. This approach is supported by Policy SP 16 which promotes limited forms of development which require a rural location and by national policy in PPW. Changes are recommended to the policy to improve its clarity (MAC35).
- 9.2 The Plan includes reference to Green Wedges in the RJ to Policy GN.1 (General Development Policy). They are shown on the Proposals Map. However, PPW⁴⁶ advises that Green Wedges should be established through development plans which should state the areas that require such protection and why. As a result of these requirements a policy is proposed to define Green Wedges between specific settlements within which there will be a presumption against inappropriate development. The RJ explains why these wedges are important. Supporting information about the Green Wedge designations is included in the Green Wedge Background Paper of September 2010. The Green Wedge policy is necessary to make the Plan sound (**MAC101**).
- 9.3 The best and most versatile agricultural land is protected by national policy⁴⁷. There is no need for a policy in the LDP on agricultural land. That said the quality of agricultural land is a consideration that has been taken into account in allocating land for development alongside other sustainability criteria. Development is proposed in a few locations on some of the better agricultural land but only where other factors in favour of the allocation outweigh the loss of the farmland.

The Environment

- 9.4 The SA and SEA processes which underpin the Plan ensure that environmental considerations, including responding to climate change, are integrated into the LDP. The HRA took into account the likely significant impact on European sites. Mitigation has been introduced into the Plan through the strengthening and rewording of policies (See Appendix 8 of the HRA). Development proposals in or near to European sites will need to be screened for project level HRA.
- 9.5 The Plan has a number of policies which address environmental issues, including the overarching strategic policy on sustainable development (Policy SP.1). The RJ to the policy now makes reference to the presumption in favour of sustainable development contained within PPW (**MAC B**). The inclusion of a strategic environmental policy is not necessary having regard to the overall contents of the Plan, national policy and UK and European legislation which seek to protect and

⁴⁶ Paragraph 4.8.11

⁴⁷ PPW Paragraph 4.10.1

enhance the environment. Such a policy would not be locally distinctive.

- 9.6 Flood risk is taken into account by Policy GN.1 (criterion 7). No housing allocations have been identified within Flood Risk Zones C1 or C2. The Development Sites SPG establishes requirements for the small number of other allocations in areas vulnerable to flooding. Localised flooding and other drainage issues, such as the impact on ordinary watercourses, could be highlighted in SPG where known.
- 9.7 The natural environment and biodiversity are protected by Policy GN.1 (Criteria 3 and 4). The RJ to the policy is proposed to be amended to refer to Ancient Woodlands and the availability of the Ancient Woodland Inventory (MAC39). An amendment is proposed to the policy on developer contributions (GN.3) to ensure that the impact of development on biodiversity is taken into account (**MAC42**). Policy GN.36 was amended at FC stage to require that all development demonstrates a positive approach to maintaining or enhancing biodiversity. TAN 5⁴⁸ indicates that a policy that protects woodlands and trees should be included in the LDP, where relevant. Although there is no single policy that protects woodlands, trees, hedges and verges, Policies SP 16 and GN.1 address protection of the environment with the RJ to both including references to such natural features.
- 9.8 Policy GN.37 combined with the statutory duties to preserve and enhance conservation areas and listed buildings provides sufficient protection for the historic environment. No requirement for locally-specific policies for the conservation of the built environment has been identified. I support deletion of Paragraph 6.155 relating to archaeological remains as it repeats national policy (**MAC105**).

Renewables

- 9.9 Pembrokeshire is recognised as an Energy Hub by the WSP. However, energy production is primarily non-renewable. That said there are opportunities in the county for small scale renewable energy projects such as small wind farms and solar power schemes. Landfalls may be required for off-shore projects. Such proposals would be supported by Policy GN.4. The policy also encourages developments to utilise power generated from renewable resources. District Heating Networks are a possibility on larger development sites. Those allocations with such potential are identified in the Development Sites SPG.
- 9.10 The Council has not set specific targets for renewable energy for the reasons set out in its Renewable Energy Study 2010. However, further work on capacity, particularly for wind energy, is to be undertaken. This may identify a target for Plan review. In the interim Policy GN.4 will allow the Plan area to contribute to national targets.

⁴⁸ Paragraph 3.3.2

Design

- 9.11 Welsh Government expects new dwellings and larger non-residential development to meet recognised sustainable building standards⁴⁹. In addition the Building Regulations impose minimum efficiency requirements on those constructing most new buildings. It is proposed to amend Policy GN.4 and its RJ so that it has regard to national policy, and will be flexible enough to deal with suggested revisions to Part L of the Building Regulations (**MAC44** and **MAC45**). The changes produce an appropriate policy to deal with resource efficiency and low-carbon energy through the planning regime.
- 9.12 Locally distinctive design is promoted by Policy GN.2. The policy also deals with other aspects of sustainable design including the use of Sustainable Drainage Systems (SuDS). The Development Sites SPG will emphasise the use of SuDS as the preferred option. It is proposed to amend the policy to include reference to landscape and townscape context and landscaping so that these elements are embedded as an integral part of the design process (MAC41). Implementation of the policy will be assisted by the preparation of SPG on design which will sit alongside TAN 12 - Design.

Recommendation

- 9.13 That in order to make the Plan sound the following changes are required:

MAC42, MAC44, MAC45, MAC101, MAC105, MAC B

- 9.14 The following minor changes which the Council proposes to the submitted Plan are also endorsed, since they improve the Plan’s clarity, coherence and consistency of interpretation:

MAC35, MAC39, MAC41

⁴⁹ PPW Paragraph 4.12.4

10 Settlement Boundaries and Housing Allocations

The Methodology

- 10.1 Settlement boundaries are defined for towns and villages in the settlement hierarchy (Policy SP 12). The method of defining boundaries, which differs between higher order settlements and Local Villages, is set out in Policy SP 13. Revisions are proposed to Policy SP 13 to clearly distinguish between the approach to higher and lower order settlements (MAC31). In towns, service centres and service villages, the boundaries take into account the physical, functional and visual extent of the settlement and encompass housing allocations. In Local Villages no allocations are proposed and the boundaries are defined more tightly, limiting development opportunities to small scale infill and rounding off.
- 10.2 In terms of the detailed delineation of boundaries, the methodology is set out in the Council’s Site Assessment Report (October 2010)⁵⁰. The considerations are the existing built environment; areas with planning permission that are physically connected and related to the settlement; and allocations made by the Plan which, once developed, would form a cohesive part of the settlement fabric. Existing employment sites and employment allocations on the periphery of settlements are generally excluded from boundaries as their inclusion would make them vulnerable to other forms of development such as housing. In the higher order settlements, caravan sites and working farms surrounded by built development are included within the boundary. A refined methodology for Local Villages excludes working farms and caravan sites from settlement boundaries as their inclusion would result in the potential for development of a scale which would be disproportionate to the size of the settlement.
- 10.3 For allocations a Candidate Site Process was undertaken whereby all sites put forward were assessed. Candidate sites which were 0.5ha or greater were initially sieved against known constraints. Smaller sites were considered as part of the settlement boundary review. Further stages of the assessment process of potential allocations considered conformity against the Preferred Strategy, access issues, proximity to settlements within the hierarchy, key stakeholder views, the scale and type of development and need for the proposal. The review of settlement boundaries coincided with the later stages of the site assessment process so that allocations could be taken into account.
- 10.4 The methodology for defining settlement boundaries and allocating sites is appropriate. Having examined the interpretation of this methodology at settlement level I am generally satisfied that it has been applied consistently. I deal with any inconsistencies in the application of the methodology in my appraisal of settlements and their boundaries and allocations as set out below. Reference is only made to Alternative Sites where this is necessary to support my reasoning.

⁵⁰ Paragraph 2.42

Haverfordwest

- 10.5 The settlement boundaries encompass built development or follow clear edges such as that formed by the A40 on the north-east side of the town. The large employment allocations at Withybush are physically distinct from the main built-up area and are, therefore, excluded from the boundary. Merlins Bridge is physically and functionally related to the town, albeit with a Green Wedge protecting the open land around Merlin’s Brook which is important to the setting of the town. The mixed use allocation in Old Hakin Road is justified.
- 10.6 The housing allocations extend the urban form in a logical manner. The allocation at Shoals Hook Lane consolidates development in a sustainable location between existing housing and the A40. The amendment proposed to Policy GN.28, increasing the number of units to 277 to ensure efficient use of the allocation, is supported (**MAC91**). The need to implement local highway improvements is recognised by the Council and will be incorporated into the Development Sites SPG. A larger urban extension around Slade Lane is not needed during the current Plan period and would be a matter for Plan review. The number of houses that are likely to be built during the Plan period at Slade Lane is, in my view, realistic, but does not preclude a greater take up of allocated land.

Milford Haven and Neyland

- 10.7 The settlement boundaries follow the edge of the built-up area, as proposed to be extended by housing allocations. The large employment allocations at Blackbridge and Honeyborough Industrial Estate are excluded from the settlement boundaries in accordance with the methodology. There is not a significant difference between the merits of the allocations and alternative sites in the Steynton area. However, the allocation on Thornton Road lies to the south of a firm edge formed by the highway. The allocation of a range of sites in the town will increase the choice for developers and the public. There is uncertainty over whether an extension to Thornton Cemetery can be delivered. Such a proposal would be considered against Policy GN.33.
- 10.8 There are constraints on the access to the housing site to the west of Silverstream, Hubberston. The likelihood is that the site would need to be accessed via the mixed use allocation to the west, a matter which can be highlighted in the Development Sites SPG. There are sufficient employment allocations in the area such that a larger site at Liddeston Ridge is not required during the Plan period. Hubberston Fort is partly within the settlement boundary but a housing allocation would not be appropriate due to uncertainty over whether constraints, such as the ancient monument, can be overcome.
- 10.9 Any historic functional link that Barnlake had with Neyland has been lost. The allocation of the Barnlake Point site for housing would not be compatible with the strategy for Small Local Villages. Whether considerations such as the planning history of the site justify the grant of

planning permission is a matter for the Council.

Pembroke Dock and Pembroke

- 10.10 The settlement boundaries incorporate the built-up areas of the towns, including the Dockyard, the employment areas on the eastern side of Pembroke Dock and the outlying housing estates at Monkton and along the Upper and Lower Lamphey Roads. With regard to the employment areas, they are sufficiently integrated with the built environment to justify inclusion.
- 10.11 The allocations at Imble Lane, Pembroke Dock are served by the existing highway network which can be improved to cater for additional housing in the area. Drainage constraints are capable of being overcome. Further allocations to the south-east of the town are not needed and would unacceptably encroach into surrounding open land. Development on the headland towards Pennar Point would be very exposed. The settlement boundary at Sycamore Woods has been drawn in accordance with the methodology. The alternative site is of insufficient size to warrant an allocation. Windfall opportunities for small housing developments exist within Pembroke Dock and other settlements.
- 10.12 There is a good range of housing allocations in Pembroke which relate well to the built form. Two of the largest allocations have outline planning permission. The site adjacent to Monkton Swifts has a number of constraints but they can be resolved with careful planning. Access limitations for the Monkton area are recognised by the Plan. The extent of access improvements required to bring sites forward is a matter for the Council, having regard to Policies SP 1 and GN.1 in particular. The allocations at Gibbas Way are well-related to the built-up area and are without significant constraints. The SPG Affordable Housing⁵¹ indicates that affordable units would be dispersed throughout sites such as those at Gibbas Way. Further allocations in the Monkton area are not needed and would be unlikely to be delivered in the Plan period. Alternative sites suggested on the eastern side of the town do not relate well to the physical characteristics of the settlement.

Fishguard and Goodwick

- 10.13 The settlement boundaries appropriately encircle built development and allocations. The Lower Town is separated from the main area of Fishguard by a Green Wedge so that its setting is protected. The Lower Town has a separate tightly defined settlement boundary.
- 10.14 A substantial allocation is proposed at Maesgwynne Farm which will meet the majority of the housing need for Fishguard and Goodwick. The site has outline planning permission. The Old Infants School is enclosed by existing development, lies close to the town centre and has an acceptable means of access. Sufficient open space exists elsewhere in

⁵¹ 2nd Draft August 2012 Paragraph 10.2

the town. Development for housing is appropriate. The site at Penwallis would be more appropriately dealt with as an affordable housing exception site rather than an allocation. Inclusion of land in the settlement boundary to the north of Plas-y-Fron would materially diminish the Green Wedge between Fishguard and the Lower Town. I support the Council’s decisions not to allocate the sites at Penwallis and Plas-y-Fron.

10.15 Goodwick has landscape, topography and other constraints that preclude land being allocated on the periphery of the built-up area for housing. Windfall opportunities exist such as land at the former Dewhirst Factory Site which has been given permission for housing (subject to a planning obligation). That said, the remainder of the Dewhirst site is well related to other industrial uses and would meet a need for local employment sites in the area. Whilst the viability of the site for employment use has been questioned, economic circumstances are likely to change over the Plan period.

Narberth

10.16 The settlement boundary includes the historic core and the main enclaves of 20th century development to the north of the town centre. Land between Kiln Park Road and the station is a discrete built up area which justifies inclusion in settlement limits. Some open areas are incorporated in these limits which would provide small scale development opportunities consistent with the methodology.

10.17 The housing allocations to the west of Redstone Road are reasonably close to the town centre and services such as the health centre. Planning permissions are in place for the majority of the land allocated. Land north of Station Road put forward for housing is a similar distance from the centre and close to the new primary school and station. However, additional allocations are not required in this small rural town. The Council’s approach to housing allocations in Narberth is sound.

10.18 Part of the Dingle Farm Caravan Site now has planning permission. The site has development on three sides. However, inclusion in the settlement boundary would not be consistent with the methodology as the site is not surrounded by development. The expansion of the National Weaving Company on Redstone Road would be more appropriately dealt with under Policy GN.9 rather than by a change to the settlement boundary.

Service Centres

10.19 The settlement boundaries for the Service Centres are appropriately defined around existing development and housing allocations and the mixed-use designation in *Johnston*. Employment allocations on the periphery of *Crymych* and *Letterston* are excluded from the boundary in accord with the methodology.

- 10.20 There are access and ownership constraints which affect the housing allocation to the north of Ysgol y Preseli in *Crymych*. However, the site is centrally located close to services. Plan monitoring and review would reveal any issues which may require intervention. An additional allocation exists at the south-eastern end of the settlement which is less constrained. No additional or alternative allocations are required in the settlement.
- 10.21 Four housing allocations are proposed in *Kilgetty*. However, the number of dwellings which could be delivered would not be disproportionate to the size of the settlement. The sites are well related to existing built form. Limitations on the capacity of the local sewage treatment works are likely to delay development until the latter period of the Plan.
- 10.22 The housing allocation is central to the linear village of *Letterston*. Additional commitments appear to exist at the eastern end of the village. The peripheral alternative site at the western end of the settlement is some distance from the village centre and is not needed.

Service Villages

- 10.23 The settlement boundaries for the Service Villages are generally consistent with the methodology. The scale of housing allocations in these villages varies depending on the size of the settlement and its range of services, the need for housing, the availability of suitable land without significant landscape or other constraints and the level of existing commitments. Having taken into account these considerations I am satisfied that in most cases the allocations are appropriate.
- 10.24 With regard to specific settlements, the allocation in *Begelly* relates well to the built-up area and is within walking distance of services in neighbouring *Kilgetty*. The allocation in *Blaenffos* was reduced in scale at FC stage. It is now more proportionate to the size of the village. The siting of the open space is dictated by the location of semi-natural neutral grassland which has been referred to by the Countryside Council for Wales. Although significant land exists within the settlement limits of *Boncath* there have been difficulties with delivery of a consented site. Land is allocated to the north of the village as an alternative. *Broadmoor* is a compact linear settlement so the only opportunity for additional housing is on the edge.
- 10.25 The allocation at *Sageston* represents a further phase of an existing development in the context of concerns over whether previously-developed land within or well-related to the village will come forward for housing. The contribution that open land within the *Carew* settlement limits makes to the village’s character is acknowledged by inclusion in the Conservation Area. The housing allocation at *Cilgerran* is well-related to the settlement. The use of SuDS should ensure that any local flooding issues in the river catchment are not exacerbated. Detailed assessment of watercourses and drainage would need to occur at application stage. Redevelopment of former industrial land at the eastern extremity of the village is assisted by its inclusion in the

settlement boundary.

- 10.26 Planning permission exists on part of the allocation at *Clarbeston Road* which is well related to the settlement and its services. Although the allocation at *Clunderwen* is on a depot, it is understood that an alternative location for the business is available. The site is central to the village. Opportunities for additional housing in *Cosheston* are limited but the allocation has reasonable access and represents rounding off. The allocations in *Croesgoch* are enclosed by field boundaries and lie opposite the modern primary school. Both allocations in *Crundale* have outline planning permission.
- 10.27 Land included within the settlement boundary at *Eglwysrwrw* is well-related to the village. New dwellings are under construction adjacent to the village allocation. The allocation at *Hayscastle Cross* meets the need for both this settlement and the neighbouring *Pont-yr-Hafod*. Vacant land included within the settlement boundary of *Hermon* is well-related to the village. The allocation at *Hook* extends a new housing estate. Previously-developed land at *Houghton* next to the school is allocated. The allocation at *Hundleton* relates well to the village and has planning permission.
- 10.28 The allocation at *Jeffreyston* is enclosed by strong natural boundaries and is well related to the built environment. Land allocated at *Llanddewi Velfrey* represents a natural rounding off. The allocation at *Lamphey* is served by existing access points and relates well to existing development. The alternative sites are not needed. Proposals for open space, community facilities and employment development beyond the settlement boundary could be considered against criteria-based policies of the Plan.
- 10.29 The allocation in *Llandissillio* is central to the village and services such as the school and post office. Inclusion of land near the Bush Inn within the settlement boundary would not be consistent with the methodology. The allocation at *Llangwm* develops land between the new school and the heart of the village. The alternative site in Rectory Road is constrained by its access and proximity to the Conservation Area. The allocation at *Maenclochog* is central and close to services. The proposed development at Station Terrace would be considered under Policy GN.9 of the Plan.
- 10.30 As *Martletwy* is not appropriate as a service village⁵², I recommend that the housing allocation under Policy GN.28 is deleted with consequent minor amendments to the totals at the end of the policy and Table 2 (**IC04**). The housing allocation at *Mathry* is well related to the village. Land to the south-west is included in the settlement boundary due to an extant planning permission. The alternative site to the north of the village is in an exposed location. The redevelopment of the farmyard for affordable housing would be considered under Policy GN.30. The inclusion of land within the settlement boundaries to the south of the

⁵² See Paragraph 3.8 of this report

A477 at *Milton* provides opportunities for small scale development opportunities. Allocations have been made at *New Hedges* under the National Park’s LDP.

- 10.31 The loss of Green Wedge arising from the housing allocation at the northern end of *Penally* is not significant. Improvements to the approach roads and safety measures on the village road would overcome access concerns. Additional land beyond the allocation at the western end of the village is not needed. The allocation in *Pentlepoir* is more central than the alternatives proposed. The inclusion of land at the south-west extremity of *Wooden* within the settlement limits is consistent with the methodology. The allocations at the western end of *Puncheston* are small scale and would assist in sustaining this remote settlement.
- 10.32 I have insufficient evidence before me about the landscape implications of extending the allocation at *Robeston Wathen* closer to the new line of the A40 so a larger site is not appropriate. The housing allocation at *Roch* is well related to existing development. Access and sewage constraints are capable of being overcome. The small allocation at *Rosemarket* represents rounding off. The allocation at *Simpson Cross* straddles the minor road. The smaller north-west portion incorporates the corner of a large field and does not physically relate to the existing built form and pattern of development. A smaller allocation incorporating the south-east portion only would be more logical and would be proportionate to the size of the village and its level of service provision (**IC05**). I recommend accordingly.
- 10.33 The allocation in *Spittal* is appropriately sited between the new school and existing housing. The allocation in *St Dogmaels* would be a natural extension of existing development. The alternative site to the north has greater access constraints. The alternative sites proposed in *St Florence* have generally poorer access than the allocation at the northern end of the village. The case for including land north of Ivy Tower Farm, *St Florence* in the settlement boundary is not clear cut so I see no reason to go against the Council’s approach. A large parcel of undeveloped land with potential for development is included within the *Tavernspite* settlement boundary. Although not allocated, ancient monument constraints appear to be capable of being overcome. Alternative sites on the edge of village are not needed.
- 10.34 A large site at the south-eastern end of *Tegryn* is under construction and will meet the housing needs of the village. Housing allocations at the northern and southern ends of *Templeton* are well related to the village. Existing parking and turning facilities for the school are satisfactory so there is no overriding need to allocate the land opposite which would not represent a natural extension to the village. The allocation and alternative site in *Tiers Cross* are similar so the Council’s choice is appropriate. The allocation at *Wolfscastle* relates to built development nearby.

Large Local Villages

10.35 The settlement boundaries for the Large Local Villages are consistent with the methodology. The working farm at *Burton* is appropriately excluded from the settlement boundary. Several sites put forward do not represent small scale rounding off or do not fit with the methodology, including those at *Burton, Freystrop, Hill Mountain, Mascle Bridge, Pen-y-Bryn, Stepside* and *Waterston*. Larger sites on the edge of *Burton Ferry, East Williamston, Hill Mountain, Keeston* and *Pen-y-Bryn* would effectively represent allocations which do not fit in with the settlement strategy. Housing sites under construction at the time of the formulation of the Deposit Plan have been included in the settlement boundaries of *Camrose, Freystrop* and *Keeston* in accordance with the methodology. Some of the smaller alternative sites put forward could be suitable for affordable housing under Policy GN.30.

Small Local Villages

10.36 The settlement boundaries for the Small Local Villages are consistent with the methodology, albeit that the opportunities for infilling are more limited than Large Local Villages due to the smaller scale of the villages. The working farms at *Lampeter Velfrey* and *Little Honeyborough* are appropriately excluded from the respective settlement boundaries. Several sites put forward by others but not allocated by the Council do not represent small scale rounding off or do not fit with the methodology, including those at *Carregwen, Lampeter Velfrey, Liddeston, Llanteg, Llawhaden, Portfield Gate, Princes Gate, Reynalton, Rhoshill* and *Wallis*. Larger sites on the edge of *Barnlake, Cold Blow, Llanteglos, Pelcomb Cross* and *Square and Compass* would effectively represent allocations which do not fit in with the settlement strategy. Some of the smaller alternative sites put forward could be suitable for affordable housing under Policy GN.30.

Other Locations

10.37 Definition in the settlement hierarchy or provision of settlement boundaries at *Brynawa, Chapel Hill, Crosshands, Gwastad, Poyston Cross, Sardis (South Pembrokeshire), Trecwn* and *Upper Nash* are not justified given the small groupings of dwellings. Allocations at such locations would be unsustainable and inappropriate. Other alternative sites suggested in isolated locations, including those near *Llanteg, Martletwy, Pont-yr-Hafod* and *Square and Compass*, would represent sporadic development in the countryside. The ribbon of development at *Velfrey Road, Whitland* is predominantly within Carmarthenshire. The creation of a separate small settlement boundary within Pembrokeshire to encompass garden land at the western end of the ribbon where it straddles Pembrokeshire would not be justified.

10.38 Recommendation

10.39 That in order to make the Plan sound the following changes are required:

MAC91

Inspector Changes IC04 and IC05

10.39 The following minor change which the Council proposes to the submitted Plan is also endorsed, since it improves the Plan’s clarity and consistency of interpretation:

MAC31

11 Implementation and Monitoring

- 11.1 The Council recognises that the private sector will deliver the vast majority of new developments. However, the County Council, other public sector organisations and the voluntary sector will also play a role in some types of development. Some infrastructure to support development will be programmed by the provider to coincide with new development. Other infrastructure will need to be funded by the developer if it is an essential requirement to allow the development to go ahead, and is not programmed by the provider (Policy GN.3 refers). The Deliverability Study and Development Sites SPG contain information on constraints, mechanisms to address the constraints and anticipated delivery of the sites. The Council intends to refine and finalise this SPG and others following adoption of the Plan to assist in implementation of the Plan’s proposals. Details of funding from public expenditure programmes are contained in the supporting evidence such as the RTP and the Pembrokeshire Regeneration Masterplan 2008/2013. In addition the Deliverability Study includes a section on potential funding streams.
- 11.2 The submitted Plan includes a separate Monitoring Framework. Amendments to the Framework have been suggested during the examination process to ensure that key indicators, policy targets and triggers are included to monitor delivery of LDP policies and proposals. Progress on implementation of the Plan, including reference to the Monitoring Framework will be an important component of the Council’s mandatory Annual Monitoring Report. The reasons for the changes to the Monitoring Framework are dealt with in the preceding chapters. As a result of changes to the Framework and Key Monitoring Outcomes revisions are also required to Figure 2⁵³ (**MAC06A, MAC06B and MAC07**) and Paragraph 7.18 dealing with Key Monitoring Outcomes (**MAC112B**).
- 11.3 With the commitment to take forward SPG and the proposed changes to the Monitoring Framework, the Plan provides robust mechanisms for implementation and monitoring and methods for establishing when the Plan or individual policies may need to be reviewed. It is also sufficiently flexible to deal with changing circumstances. The changes to the Monitoring Framework (**MAC119**) are recommended to ensure that the Plan satisfies the coherence and effectiveness soundness tests.

Recommendation

- 11.4 That in order to make the Plan sound the following changes are required:

MAC06A, MAC06B, MAC07, MAC119, MAC112B

⁵³ Relationship between Issues, Objectives, Policies and Monitoring

12 Overall Conclusions

- 12.1 I conclude that, with the changes that have been recommended and endorsed as set out in Appendix A and Appendix B of this report, the Pembrokeshire County Council Local Development Plan satisfies the requirements of section 64(5) of the 2004 Act and meets the procedural, consistency and coherence and effectiveness tests of soundness in LDP Wales. Furthermore, the Plan will contribute to the achievement of sustainable development.

Mark Dakeyne

INSPECTOR

Appendix A: Council’s proposed changes recommended or endorsed by the Inspector

Appendix B: Inspector’s binding recommendations

Appendix A

The Authority’s proposed changes recommended or endorsed by the Inspector.

Changes shaded grey and numbered in bold are recommended changes required to make the Plan sound. Other changes are not essential to make the Plan sound but are endorsed as they assist in the clarity, precision, coherence and consistency of the Plan. These other changes are not shaded grey and are numbered in non-bold.

Change No.	Policy or Para No	Proposed Change
MAC A		<i>Replace all references in LDP to Planning Policy Wales to refer to Edition 5 instead of Edition 4.</i>
<i>Chapter 1: Introduction</i>		
No Matters Arising Changes proposed in relation to this section.		
<i>Chapter 2: Key Plans & Strategies affecting Pembrokeshire</i>		
MAC01	2.5	<p><i>Amend paragraph 2.5 to read:</i></p> <p>"Additionally the Spatial Plan identifies medium-sized key settlements, these being Tenby in the Pembrokeshire Coast National Park, Narberth in Pembrokeshire, Whitland and St Clears in Carmarthenshire and Cardigan in Ceredigion. These have Service Centre, employment and tourism functions. Local Centres are identified at Saundersfoot (National Park), St Davids (National Park), Crymych (mainly within Pembrokeshire LDP but straddling the boundary with the National Park), Kilgetty, Newport (National Park) and Letterston in Pembrokeshire and Laugharne / Pendine and Newcastle Emlyn in Carmarthenshire."</p>
<i>Chapter 3: Key Economic, Social & Environmental Trends & Issues</i>		
MAC02	3.7	<p><i>Amend paragraph 3.7 to read:</i></p> <p>"The population of Pembrokeshire is forecast to grow during the plan period. Natural change is low, with deaths slightly outnumbering births but there is significant net immigration which is the main driver of the</p>

Change No.	Policy or Para No	Proposed Change
		<p>increasing population. Welsh Government population projections²¹ for Pembrokeshire excluding the National Park suggest that the population will grow from approximately 99,000 97,147 in 2011 to approximately 108,000 102,626 in 2021 - an increase of 9,000 5,479."</p> <p><i>Amend footnote 21 to read:</i></p> <p>"²¹ 2008 population forecast, based on 2006 population estimates and adjusted to take account of 2010 release of population projections for PCNPA Welsh Government/Stats Wales 2008-based population projections for Local Authorities and National Parks, published May 2010."</p>
MAC03	3.24	<p><i>Amend paragraph 3.24 to read:</i></p> <p>"Milford Haven Port is the busiest port in Wales and the 3rd most important in the UK (Milford Haven Port Authority Annual Report 2009). With 25% of the country’s petrol and diesel requirements and up to 30% of its gas being handled at the port, Milford Haven is the Energy Capital of the UK (Milford Haven Port Authority Annual Report and Accounts 2008). During 2009, the port handled just over 59m gross tons of shipping which amounted to over 39m tonnes of cargo. There are also important pipeline links from the Milford Haven ports into other parts of Wales and England. There are two Irish Sea ferry terminals in Pembrokeshire at Fishguard and Pembroke Dock providing important freight and passenger links to and from Ireland. While sea travel to and from Ireland is declining in terms of numbers of passengers there has been an increase in freight. This increase in freight has implications for the transport network. There is an airport in Haverfordwest which is primarily used for private flying, club flying, training and receipt of medical supplies air ambulance and which offers the opportunity for significant economic growth. The Regional Transport Plan identifies Haverfordwest (Withybush) Airport as one of three small regional Airports in south west Wales. There could be modest expansion of ancillary facilities at the airport during the plan period, more significant growth in activity being constrained by the capacity / alignment of the runways and by the use of part of the airfield by the Pembrokeshire County Show each year."</p>
MAC04	3.29	<p><i>Amend paragraph 3.29 to read:</i></p> <p>"As well as habitats there are many important species present across the county as a whole, with otters, bats, dormice, farmland birds, Marsh Fritillary and Brown Hairstreak butterflies locally prevalent. Whilst the</p>

Change No.	Policy or Para No	Proposed Change
		total area which is designated for biodiversity is 35.3 km ² (3530 ha) or 3.4% of the land area, many species exist and migrate across the area as a whole and beyond. The LDP plays an important role in enhancing biodiversity across the county as a whole and protecting designated sites and species and essential ecological connectivity ‘corridors’ for biodiversity from damaging development. Some habitats are important for their ground water dependent ecosystems, an issue picked up by the Water Framework Directive and the Revised Draft Water Resources Management Plan for Welsh Water 2011+ 2 , which identifies water resources as an issue for part of the County, but identifies proposed solutions.”
MAC05	3.28	<p><i>Amend paragraph 3.28 to read:</i></p> <p>“The predominance of designated sites in the County demonstrates its importance, internationally and nationally, across a rich diversity of habitats, including river, marine, lowland heaths and semi-natural oak woodland and some coastal and estuarine areas. These assets, including marine and terrestrial Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Sites of Special Scientific Interest (SSSIs), National Nature Reserves (NNRs), Local Nature Reserves (LNRs) and Wildlife Reserves need to be managed carefully for both local and national benefit and to safeguard the unique environment. New sites may be designated during the plan period through a consultation process with the Countryside Council for Wales (CCW).”</p>
<i>Chapter 4: Vision & Objectives</i>		
MAC06	4.1	<p><i>Amend paragraph 4.1 to read:</i></p> <p>“In considering how this Plan should tackle key issues affecting the county, identified in Chapter 2, 3, and guide and manage future development, it is important to have a clear vision and objectives for what the county should be like at the end of the plan period – 2021.”</p>

Change No.	Policy or Para No	Proposed Change				
MAC06A	Fig 2	<i>Amend Figure 2 to read:</i>				
				<ul style="list-style-type: none"> To be efficient in the use of resources and energy 	Criteria based policy requiring development proposals to minimise energy demand, improve efficiency and promote power generated from renewable resources. Criteria based policy on sustainable design	4. Development achieving high standards of resource and energy efficiency with all new dwellings meeting the standards set out in national planning policy.
MAC06B	Fig 2	<i>Amend Figure 2 to read:</i>				
		<i>A Strong Rural and Urban Economy (2) Infrastructure, Transport and Accessibility (3)</i>	<i>Building on the County's strategic location for energy and port related development (E)</i>	<ul style="list-style-type: none"> To ensure sufficient land is available for port & energy/ renewable energy technologies both for research and for delivery in key sites on the Haven and in the Hub Towns. To improve connectivity across the County and particularly to 	Allocated employment sites to enable energy related developments both for research and development on the Haven and in the Hub Towns. Criteria based policy supportive of port related development proposals. Requirements for future transport infrastructure improvements identified.	4. Availability and take up of employment land is secured for Port and energy/renewable energy related sectors. 5. Protection of safeguarded transport routes from inappropriate development.

Change No.	Policy or Para No	Proposed Change				
				the Hub Towns and Haven.		
MAC07	Fig 2	<i>Amend Figure 2 Sustainable Communities to read:</i>				
		Sustainable Communities (1)	Developing vibrant communities providing a range and mix of homes and local services (D)	<ul style="list-style-type: none"> ▪ To provide sufficient land to meet the housing needs arising within the County Council’s planning area. ▪ To provide housing which is affordable. 	<p>Land is identified within the Plan for 5600 5700 dwellings.</p> <p>Criteria based policy establishing affordable housing targets. All development in Small Local Villages to be for affordable housing.</p>	<p>11. An estimated 5600 5700 new dwellings are provided of which at least a minimum of 1450- 980 new affordable homes are provided.</p>
				<ul style="list-style-type: none"> ▪ To protect local culture and language. 	Criteria based policy on the Welsh language	12. Development is sensitive to the needs of language sensitive communities in scale and nature
				<ul style="list-style-type: none"> ▪ To enable the provision of community facilities. 	Identified allocations for community facilities. Criteria based policy to protect and provide community facilities.	13. Existing community facilities are protected and provision enhanced

Change No.	Policy or Para No	Proposed Change														
MAC08	Fig 2	<p><i>Amend Figure 2 Environment to read:</i></p> <table border="1" data-bbox="472 375 2114 1420"> <tr> <td data-bbox="472 375 734 1420">Environment (4)</td> <td data-bbox="734 375 958 1420"> <p>Delivering design excellence and environmental quality (B) and</p> <p>Protecting and enhancing the natural and built environment (J)</p> </td> <td data-bbox="958 375 1263 978"> <ul style="list-style-type: none"> To protect and enhance the natural environment, particularly designated nature sites and protected species and habitats across the plan area. </td> <td data-bbox="1263 375 1677 978"> <p>Identified designated nature sites on the Proposals Maps.</p> <p>Identified green wedges on the Proposals Maps.</p> <p>Criteria policy protecting landscape, biodiversity and habitats.</p> </td> <td data-bbox="1677 375 2114 978"> <p>14. Landscape quality, diversity and distinctiveness is maintained</p> <p>15. Development does not compromise the favourable conservation status of species and habitats of European significance and wherever possible enhances biodiversity</p> </td> </tr> <tr> <td data-bbox="472 978 734 1420"></td> <td data-bbox="734 978 958 1420"></td> <td data-bbox="958 978 1263 1420"> <ul style="list-style-type: none"> To manage waste sustainably. </td> <td data-bbox="1263 978 1677 1420"> <p>Criteria-based policies for assessment of waste management proposals.</p> <p>Allocations for new waste facilities.</p> <p>Criteria policy on use of recycled and secondary aggregates</p> </td> <td data-bbox="1677 978 2114 1420"> <p>16. Waste facilities to meet the County’s requirements.</p> </td> </tr> </table>					Environment (4)	<p>Delivering design excellence and environmental quality (B) and</p> <p>Protecting and enhancing the natural and built environment (J)</p>	<ul style="list-style-type: none"> To protect and enhance the natural environment, particularly designated nature sites and protected species and habitats across the plan area. 	<p>Identified designated nature sites on the Proposals Maps.</p> <p>Identified green wedges on the Proposals Maps.</p> <p>Criteria policy protecting landscape, biodiversity and habitats.</p>	<p>14. Landscape quality, diversity and distinctiveness is maintained</p> <p>15. Development does not compromise the favourable conservation status of species and habitats of European significance and wherever possible enhances biodiversity</p>			<ul style="list-style-type: none"> To manage waste sustainably. 	<p>Criteria-based policies for assessment of waste management proposals.</p> <p>Allocations for new waste facilities.</p> <p>Criteria policy on use of recycled and secondary aggregates</p>	<p>16. Waste facilities to meet the County’s requirements.</p>
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Change No.	Policy or Para No	Proposed Change				
				<ul style="list-style-type: none"> ▪ To conserve and enhance the historic environment ▪ To achieve good sustainable design. 	<p>Criteria policy on recovery and re-use of waste."</p> <p>Criteria based policy approach to assess development proposals which would impact on the historic and built environment.</p> <p>High quality sustainable design policy.</p>	<p>17. A flourishing historic and built environment</p> <p>18. High quality sustainable design.</p>
<i>Chapter 5: LDP Strategy</i>						
MAC09	5.2	<p><i>Amend paragraph 5.2 to read:</i></p> <p>"The strategy focuses on enabling development in accordance with the objectives and sub-objectives established in Figure 2 Chapter 4: It includes a settlement strategy that aims to achieve a balanced distribution of new development between urban and rural Pembrokeshire. Within the rural area, growth is focused on those settlements with a good level of service provision. It is anticipated that 60% of housing will be built in the urban areas and 40% in the rural areas⁴² "</p> <p><i>New footnote 42 to read:</i></p> <p>"⁴²Appendix 3 provides further information."</p>				
MAC10	SP 1	<p><i>Amend wording after policy text to read:</i></p> <p>"All key issues apply.</p> <p>This strategic policy will contribute towards achieving Objective(s): A, B, C, D and J.</p>				

Change No.	Policy or Para No	Proposed Change
		The following General Policies provide more detailed guidance on this strategic policy: GN1 – GN4, GN33 – GN37."
MAC B	SP 1 5.6	<p><i>Amend paragraph 5.6 to read:</i></p> <p>"The planning system provides for a presumption in favour of sustainable development and national planning policy provides a definition of sustainable development in Wales⁴⁴. The overarching aim of the Plan is to ensure that Sustainable Development is achieved. This means ensuring that the types of development that take place are appropriate for their location and built and designed in such a way as to achieve positive economic, social and environmental impacts. Detailed policies such as General Policies GN1 to GN4 and GN.33 to GN.37 of the Plan will be critical in ensuring that this Strategic Policy is met. These policies focus on ensuring that proposals are appropriate in scale and nature for different locations, that the design achieves safe, attractive and inclusive environments which are sustainable and optimise energy use and efficiency and incorporate renewable energy technologies where feasible, whilst addressing landscaping and infrastructure requirements of any development."</p> <p><i>New footnote 44 to read:</i></p> <p>"⁴⁴ See sections 4.1 and 4.2 of Planning Policy Wales (Edition 5)"</p>
MAC11	SP 2/ 5.9	<p><i>Amend paragraph 5.9 to read:</i></p> <p>"Milford Haven Port (which incorporates the dock areas at both Milford Haven and Pembroke Dock) provide internationally important and scarce deep-water port facilities in a sheltered location. At Fishguard Harbour (Goodwick) and Milford Haven Port improvements to facilities and infrastructure will benefit the local and national economy and will confer benefits on other countries, particularly the Republic of Ireland. These areas have been spatially defined on the Proposals Maps. The spatial area defined recognises those areas that are most suitable for these forms of development, but the policy is not intended to protect such areas exclusively for such development. Individual proposals coming forward under policy SP2 will require project level Habitats Regulation Appraisal to consider their likely significant effects on the features of the SAC. The seaward limit of planning control is normally the mean low water mark (at Pembroke Dock it is the mid-channel mark). Development proposals below this mark (or beyond the mid-channel mark at Pembroke Dock) are outside the</p>

Change No.	Policy or Para No	Proposed Change												
		scope of the planning system, being regulated under the provisions of other legislation."												
MAC12	SP 2/ 5.10	<p><i>Amend paragraph 5.10 to read:</i></p> <p>"Milford Haven Port already hosts major energy-related installations and infrastructure and there is potential to further develop this role. It also provides a ferry terminal, at Pembroke Dock, providing freight and passenger connections to the Republic of Ireland. As well as the ferry terminal, there are also extensive areas of employment land at Pembroke Dockyard, together with smaller areas used for other purposes. Within Pembroke Dockyard, discrete areas of land are available for re-use for employment and/or port-related purposes. Additionally, re-configuration of areas currently in use may be proposed in conjunction with transformative development proposals. At Milford Dock, current land uses include employment, leisure, marina, residential, retail, berthing for fishing vessels and port-related engineering. Further land in this area is available for re-use and there is a possibility that, as at Pembroke Dockyard, re-configuration of areas currently in use may be proposed in conjunction with transformative development proposals."</p>												
MAC13	SP 3	<p><i>Amend policy to read:</i></p> <p>"Land is provided for the development of 173 hectares of employment land on a mix of strategic and local employment sites. Strategic employment sites are identified at the following locations:</p> <table border="1" data-bbox="483 1059 2114 1385"> <thead> <tr> <th data-bbox="483 1059 1003 1131">Site Name</th> <th data-bbox="1003 1059 1339 1131">Site Reference</th> <th data-bbox="1339 1059 1592 1131">Site Size</th> <th data-bbox="1592 1059 2114 1131">Use Class</th> </tr> </thead> <tbody> <tr> <td data-bbox="483 1131 1003 1243">Blackbridge, Milford Haven</td> <td data-bbox="1003 1131 1339 1243">S/EMP/086/LDP/01</td> <td data-bbox="1339 1131 1592 1243">33.45ha</td> <td data-bbox="1592 1131 2114 1243">B1, B2, B8</td> </tr> <tr> <td data-bbox="483 1243 1003 1385">Pembrokeshire Science and Technology Park, Pembroke Dock</td> <td data-bbox="1003 1243 1339 1385">S/EMP/096/00001</td> <td data-bbox="1339 1243 1592 1385">22.38ha</td> <td data-bbox="1592 1243 2114 1385">B1</td> </tr> </tbody> </table>	Site Name	Site Reference	Site Size	Use Class	Blackbridge, Milford Haven	S/EMP/086/LDP/01	33.45ha	B1, B2, B8	Pembrokeshire Science and Technology Park, Pembroke Dock	S/EMP/096/00001	22.38ha	B1
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Blackbridge, Milford Haven	S/EMP/086/LDP/01	33.45ha	B1, B2, B8											
Pembrokeshire Science and Technology Park, Pembroke Dock	S/EMP/096/00001	22.38ha	B1											

Change No.	Policy or Para No	Proposed Change			
		Withybush Business Park, Haverfordwest	S/EMP/040/00001	20.61ha	B1
		Trecwn	S/EMP/136/0001	21.11ha	B1, B2, B8
<p>The specified uses are those that will be permitted on the listed sites. Where appropriate, other classes of employment use or compatible sui generis uses may also be permitted (or combinations of such uses)."</p>					
MAC14	SP 3/ 5.17	<p><i>Amend paragraph 5.17 to read:</i> "Policy GN36 will be particularly relevant to the delivery of strategic employment sites, to ensure the avoidance of significant adverse impact through the maintenance and enhancement of protected and priority species, their habitats and designated sites. Policy GN 36 also sets out a requirement for mitigation provisions in appropriate cases."</p>			
MAC15	SP 5	<p><i>Amend policy to read:</i> "Proposals for development relating to the visitor economy will be supported provided that they are in sustainable locations, contribute to the diversity and quality of accommodation and attractions, enhance respect and protect the environment, and benefit local communities."</p>			
MAC16	SP 6/ 5.31	<p><i>Amend paragraph 5.31 to read:</i> "Based on an 'in principle' agreement between the Council and the National Park Authority, a Pembrokeshire-wide reserve provides for a combined landbank for hard rock of 47.4 36.47 years and for sand and gravel of 15.4 17.86 years at 2008-2012, with 34.40 28.82 years of hard rock supply and 2.42 8.36 years of sand and gravel available at 2021."</p>			
MAC17	SP 6	<p><i>Amend footnote 47 to read:</i> "⁴⁷ Mineral Landbank Calculations (based on December 2008 data) Summary Statement for Pembrokeshire County Council – Update, July 2012."</p>			
MAC18	SP 6/	<p><i>Amend paragraph 5.34 to read:</i></p>			

Change No.	Policy or Para No	Proposed Change
	5.34	<p>“The minerals industry has not give an indication of its preference for future sand and gravel production sites within the plan area and in that context, neither sand and gravel working allocations nor identification of Preferred Areas for future working are appropriate for this plan. Instead, an Area of Search is identified for future sand and gravel working, which is the safeguarded sand and gravel resource area. This forms an element of the safeguarded mineral resource shown on the Proposals Map. The safeguarded sand and gravel resource will be identified separately from other elements of the safeguarded mineral resource in the Supplementary Planning Guidance on minerals safeguarding buffer zones.”</p>
MAC19	SP 6/ 5.35	<p><i>Amend paragraph 5.35 to read:</i></p> <p>“ Further discussions will now take place within the region between Local Planning Authorities and with minerals operators to identify the best potential locations for future sand and gravel working in Pembrokeshire and south west Wales. These will examine the nature and extent of potential alternative supplies, including opportunities to use recycled secondary products. The LDP therefore presents an interim position on minerals production, particularly in relation to sand and gravel. The Council is committed to maintaining the momentum towards the eventual cessation of minerals production in the Pembrokeshire Coast National Park and will work collaboratively to help resolve this issue, while recognising that full achievement will only be reached once existing consented quarries in the National Park are worked out or production ceases for other reasons. Should any shortfall in the reserve be revealed through annual monitoring, planning applications in the Areas of Search will be assessed against Policy GN 24.”</p>
MAC20	SP 7	<p><i>Amend policy to read:</i></p> <p>“Provision is made for approximately 7,300 7,524 dwellings in the plan period, to enable delivery of 5,700 5,724 dwellings.”</p>
MAC21	SP 7/ 5.38	<p><i>Amend paragraph 5.38 to read:</i></p> <p>“Sufficient residential land is made available to meet the future needs of communities for both market and affordable housing. On the basis of sites allocated for housing under Policy GN 28, as well as completions, units under construction and allowances for windfall sites, small sites, conversions, demolitions and bringing empty properties back into beneficial use, the Plan makes provision for 7,524338 dwellings. This allows for 1,797614 dwellings more than the 5,724 units required, to allow for choice, flexibility and renewal of the</p>

Change No.	Policy or Para No	Proposed Change
		<p>existing housing stock and for non-take up of sites. The scale of housing land provision is based on an anticipated growth in population of approximately 9,000. Detailed analysis in relation to the housing requirement is set out in the Scale and Location of Growth ADDENDUM 2011 background paper which draws on population and household estimates prepared by Welsh Government and the County Council. A summary of the housing requirement and supply is attached at appendix 3, with further site specific guidance included in the accompanying Supplementary Planning Guidance (SPG) on Development Sites.”</p>
<p>MAC22</p>	<p>SP 8</p>	<p><i>Amend policy to read:</i> “Approximately At least 1,450 980 new affordable dwellings will be provided. Linked key issues: Sustainable Communities This strategic policy will contribute towards achieving Objective(s): D The following General Policies provide more detailed guidance on this strategic policy: GN.28, GN29 and GN30”</p>
<p>MAC23</p>	<p>SP 8/ 5.40</p>	<p><i>Amend paragraph 5.40 to read:</i> “The need for affordable housing in Pembrokeshire is acute across the whole county and is informed by the Common Housing Register, the Pembrokeshire Local Housing Market Assessment (2007) (2012) and the Pembrokeshire Housing Strategy. In January 2010 there were 2,427 households in need of affordable housing. The LHMA identified an annual shortfall of 406 1656 affordable homes over 10 years to meet accumulated historical under provision. A detailed critique of the flaws in the LHMA methodology, which is considered to result in gross over assessment of the scale of need by duplicate counting and an alternative methodology to derive the scale of need are included in the supplementary background paper ‘Statement of Housing Need, 2011’.”</p>
<p>MAC24</p>	<p>SP 8/ 5.42</p>	<p><i>Amend paragraph 5.42 to read:</i> “The affordable housing target comprises a realistic assessment of how many affordable homes will be developed over the plan period to meet newly arising need and to contribute to existing identified need. The target provides for affordable homes delivered through various means, including: • The use of Social Housing Grant (SHG);</p>

Change No.	Policy or Para No	Proposed Change
		<ul style="list-style-type: none"> • Planning obligations negotiated as part of all residential developments; • On sites developed by social housing providers; and • On exception sites. • Planning obligations negotiated as part of all residential developments - approximately 476 dwellings; • On sites developed by Registered Social Landlords – approximately 401 dwellings; • Other sources, including exception sites and self-build affordable housing – approximately 105 dwellings."
MAC25	SP8/ 5.42	<p><i>Delete footnote 57 to read:</i> "⁵⁷ in compliance with PPW (Edition 4 2010), paragraph 9.2.16"</p>
MAC26	SP 8/ 5.43	<p><i>Amend paragraph 5.43 to read:</i> "The County Council has undertaken viability appraisals to establish appropriate thresholds and indicative (percentage) targets for developer provision of affordable housing on allocated sites. These demonstrate that it is usually viable for affordable homes to be provided on site and targets between up to 5% and 25% have been set on sites of 5 units or more it is usually viable for between 20% and 30% of a housing development to be for affordable homes."</p>
MAC27	SP 11/ 5.51	<p><i>Amend paragraph 5.51 to read:</i> "The RWP suggests that the total area of land required in South West Wales for new in building facilities ranges from 60 hectares to 85.2 hectares (depending on the option chosen) and an Appendix to that document lists sites in each Unitary Authority area (including Pembrokeshire) where this might potentially happen (these being major industry sites and some other sites where Use Class B2 might be accepted). This Plan provides an update on sites with potential for this type of use. The RWP makes it clear that a surplus of land is available for accommodation of even the highest estimate of the land requirement for new waste management facilities in the region. The LDP provides a choice of potentially suitable sites for various waste management activities and will rely on the market to make choices over whether to locate within the Plan area or elsewhere within the region. The sites allocated by policy GN.39</p>

Change No.	Policy or Para No	Proposed Change																																								
		plus the available Class B2 land within the B2 sites listed in the same policy meet the Regional Waste Plan’s requirements for the Plan area.”																																								
MAC28	5.55	<p><i>Amend paragraph 5.55 to read:</i></p> <p>“The settlement strategy aims to distribute new development equitably appropriately across rural and urban areas, using a settlement hierarchy that incorporates the principles of the Wales Spatial Plan. The settlement strategy aims to direct housing, employment and services to locations where people already live and work, in line with the Wales Spatial Plan and the settlement hierarchy.”</p>																																								
MAC29	SP 12	<p><i>Amend policy to read:</i></p> <p>1. Hub Towns</p> <p>1a–Haven Hub Haverfordwest Milford Haven Pembroke Dock Pembroke Neyland</p> <p>1b–North Pembrokeshire Hub Fishguard Goodwick</p>																																								
MAC30	SP 12/ 5.61	<p><i>Amend paragraph 5.61 table to read:</i></p> <table border="1" data-bbox="510 858 1944 1433"> <thead> <tr> <th data-bbox="510 858 887 1129">Policy</th> <th data-bbox="887 858 1039 1129">Haven Hub Towns</th> <th data-bbox="1039 858 1191 1129">Fishguard and Goodwick Hub</th> <th data-bbox="1191 858 1344 1129">Narberth</th> <th data-bbox="1344 858 1496 1129">Service Centres</th> <th data-bbox="1496 858 1648 1129">Service Villages</th> <th data-bbox="1648 858 1800 1129">Large Local Villages</th> <th data-bbox="1800 858 1944 1129">Small Local Villages</th> </tr> </thead> <tbody> <tr> <td data-bbox="510 1129 887 1177">Housing Allocations</td> <td data-bbox="887 1129 1039 1177">✓</td> <td data-bbox="1039 1129 1191 1177">✓</td> <td data-bbox="1191 1129 1344 1177">✓</td> <td data-bbox="1344 1129 1496 1177">✓</td> <td data-bbox="1496 1129 1648 1177">✓</td> <td data-bbox="1648 1129 1800 1177"></td> <td data-bbox="1800 1129 1944 1177"></td> </tr> <tr> <td data-bbox="510 1177 887 1262">Windfall market housing</td> <td data-bbox="887 1177 1039 1262">✓</td> <td data-bbox="1039 1177 1191 1262">✓</td> <td data-bbox="1191 1177 1344 1262">✓</td> <td data-bbox="1344 1177 1496 1262">✓</td> <td data-bbox="1496 1177 1648 1262">✓</td> <td data-bbox="1648 1177 1800 1262">✓</td> <td data-bbox="1800 1177 1944 1262"></td> </tr> <tr> <td data-bbox="510 1262 887 1347">Local need affordable housing</td> <td data-bbox="887 1262 1039 1347">✓</td> <td data-bbox="1039 1262 1191 1347">✓</td> <td data-bbox="1191 1262 1344 1347">✓</td> <td data-bbox="1344 1262 1496 1347">✓</td> <td data-bbox="1496 1262 1648 1347">✓</td> <td data-bbox="1648 1262 1800 1347">✓</td> <td data-bbox="1800 1262 1944 1347">✓</td> </tr> <tr> <td data-bbox="510 1347 887 1433">Exception sites for affordable housing</td> <td data-bbox="887 1347 1039 1433">✓</td> <td data-bbox="1039 1347 1191 1433">✓</td> <td data-bbox="1191 1347 1344 1433">✓</td> <td data-bbox="1344 1347 1496 1433">✓</td> <td data-bbox="1496 1347 1648 1433">✓</td> <td data-bbox="1648 1347 1800 1433">✓</td> <td data-bbox="1800 1347 1944 1433">✓</td> </tr> </tbody> </table>	Policy	Haven Hub Towns	Fishguard and Goodwick Hub	Narberth	Service Centres	Service Villages	Large Local Villages	Small Local Villages	Housing Allocations	✓	✓	✓	✓	✓			Windfall market housing	✓	✓	✓	✓	✓	✓		Local need affordable housing	✓	✓	✓	✓	✓	✓	✓	Exception sites for affordable housing	✓	✓	✓	✓	✓	✓	✓
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Change No.	Policy or Para No	Proposed Change							
		Employment Allocations	✓	✓	✓	✓	✓		
		Employment sites through criteria-based policies	✓	✓	✓	✓	✓	✓	✓
		Community facilities – within or well-related to settlements	✓	✓	✓	✓	✓	✓	✓
MAC31	SP 13	<p><i>Amend policy to read:</i></p> <p>“Settlement boundaries are defined shown for all settlements and define the areas within which development opportunities may be appropriate. Hub Towns, Rural Towns, Service Centres, and Services Villages, where market and local needs affordable housing will be permitted. Within Large Local Villages, Settlement Boundaries are defined indicating locations where market housing and local needs affordable housing will be permitted. Within Small Local Villages, Settlement Boundaries are defined indicating where appropriate local needs affordable housing will be permitted. In Hub and Rural Towns, Service Centres and Service Villages settlement boundaries define the physical, functional and visual extent of the settlement and take into account proposed allocations. Local Village settlement boundaries are defined more tightly, limiting opportunities to small scale infill and rounding off.”</p>							
MAC32	SP 13/ 5.63	<p><i>Amend paragraph 5.63 to read:</i></p> <p>“Settlement Boundaries define the areas that have a physical, functional and visual connection to a settlement. A Settlement Boundary ensures that development takes place in sustainable locations and that the natural environment is protected. For most types of development the most appropriate location is within a Settlement Boundary, although in some cases there will be justification for an edge-of-settlement or countryside location. The general policies will clarify locations considered acceptable for specific land-uses, including exceptional circumstances in which development may take place outside and adjacent to a settlement boundary. Development proposals for housing in the Hub Towns, Rural Towns, Service</p>							

Change No.	Policy or Para No	Proposed Change
		Centres and Service Villages will be expected to take into account, in the mix of housing type, size and tenure, the increasing numbers of single person households and the ageing population.”
MAC33	SP 15/ 5.74	<p><i>Amend paragraph 5.74 to read:</i></p> <p>“In the Service Centres, Service Villages and Large Local Villages a range of different housing types, employment and service proposals will be permitted. In Small Local Villages the housing will be restricted to local affordable housing only⁶³. Some uses can take place where a proposal is well-related to a Settlement Boundary, for example some types of employment proposal and affordable housing on exception sites. In Small Local Villages settlement boundaries are used to provide clarity on where local needs affordable housing may be suitable, and where employment and community facilities may come forwards within or adjacent to the settlement boundary.”</p> <p><i>New footnote 63 to read:</i></p> <p>“⁶³Supplementary Planning Guidance on affordable housing defines local needs affordable housing.”</p>
MAC34	SP 15/ 5.77	<p><i>Amend paragraph 5.77 to read:</i></p> <p>“Narberth is an attractive market town in east Pembrokeshire with a niche retail offer that attracts visitors from a wide catchment area. Development in Narberth should maintain the attractiveness of the experience of living in and visiting the town. Residential development during the plan period will include a range of different housing types, including an identified opportunity for live-work units. Narberth also offers good links to the A40 and therefore an employment allocation has been made along Redstone Road. Further proposals to develop and expand employment premises which are within or well-related to the Settlement Boundary of the town are also encouraged.”</p>
MAC35	SP 16	<p><i>Amend policy to read:</i></p> <p>“Within the Countryside development will meet tThe essential requirements of people who live and work in the countryside will be met whilst protecting the landscape and natural and built environment of Pembrokeshire and adjoining areas, by promoting. Development which minimises visual impact on the landscape and relates to one of the following will be promoted:</p>

Change No.	Policy or Para No	Proposed Change
		<p>1. Appropriate development which minimises visual impact on the landscape and respects the natural and built environment;</p> <p>21. Enterprises for which a countryside location is essential;</p> <p>32. Opportunities for rural enterprise workers to be housed in suitable accommodation that supports their employment ; and</p> <p>43. The re-use of appropriate existing buildings.”</p>
MAC36	SP 16/ 5.81	<p><i>Amend paragraph 5.81 to read:</i></p> <p>“All locations outside the Settlement Boundaries are considered to be countryside. Generally, national and local planning policies restrict residential development in areas defined as being in the countryside to those whose employment requires them to live in close proximity to their place of work in the countryside. Criteria for such proposals are established by national policy. In some instances conversion of traditional buildings in the countryside into residential use will be permitted where it means a traditional or historic building of significant historic and/or architectural merit, which might otherwise be lost, is conserved and used. The building must be physically capable of accommodating the new use with minimal alteration to the original structure. Converting non traditional buildings may be acceptable for employment uses.”</p>
<i>Chapter 6: General Policies</i>		
MAC37	GN.1	<p><i>Amend GN.1 criterion 5 to read:</i></p> <p>“It would take place in an accessible location, would incorporate sustainable transport and accessibility principles and would not result in a detrimental impact on highway safety or in traffic exceeding the capacity of the highway network.”</p>
MAC38	GN.1/ 6.4	<p><i>Amend footnote 68 to read:</i></p> <p>“⁶⁸ See Policy GN35A Green Wedges for further details See LDP Background paper ‘Green Wedges’ September 2010”</p>
MAC39	GN.1/ 6.4	<p><i>Amend paragraph 6.4 to read:</i></p> <p>“Pembrokeshire’s natural and built environment will be protected from inappropriate development and, where possible, enhanced. Various designations, including nature designations, geological and</p>

Change No.	Policy or Para No	Proposed Change
		<p>geomorphological designations, Town and Village Greens, Common Land and Green Wedges contribute to conserving the character of Pembrokeshire’s green spaces and their surrounding environs. Furthermore the Plan area has many attractive functional landscapes which are dependent on sound land management and conservation practices and has a close physical and functional interrelationship with the neighbouring Pembrokeshire Coast National Park. Any development proposal must therefore demonstrate that it respects the natural environment, the landscape character, coherence and integrity, native species, soils, and ground and surface waters. Sensitive landscaping and planting, and the creation, maintenance and management of landscape features important to wildlife will be encouraged. Where a development proposal would result in the loss of a local landscape feature it must demonstrate that this would be outweighed by its positive impact on the overall distinctive character of the area.</p> <p>6.4a Urban and rural woodland, tree cover and hedgerows can also contribute to the visual quality and diversity of the landscape, to recreational and educational opportunities and to substantive environmental benefits such as additional or enhanced priority habitats and feeding grounds, shelter, shade, improved carbon capture, ameliorating microclimates and improving air quality. Development proposals should utilise the natural features of a site. Development that would impact upon trees, woodland and/or hedgerows will require an arboricultural survey and should aim to retain and adequately protect these features prior to, during and after development. Prospective developers of schemes that may impact upon Ancient or Semi-Natural Woodland should consult the Ancient Woodland Inventory⁶⁹ prior to any disturbance of a site. The Local Planning Authority will consult with CCW prior to authorising development on sites affecting Ancient or Semi-Natural Woodland. In exceptional circumstances, where the need for a development exceeds the wildlife and/or amenity value, a good standard of replacement must be agreed prior to their removal. Pembrokeshire has a full set of quality assured LANDMAP layers which evaluate the visual and sensory landscape, cultural landscape, landscape habitats, the geological landscape, and the historic landscape and, along with national planning policy, applicants are encouraged to use this information to inform their proposals as it will be used in development decision making."</p> <p><i>New footnote 69 to read:</i></p>

Change No.	Policy or Para No	Proposed Change
		“ ⁶⁹ see Forestry Commission Wales website: http://www.forestry.gov.uk/forestry/INFD-8VPJFD ”
MAC40	GN.1/ 6.9	<p><i>Amend paragraph 6.9 to read:</i></p> <p>“Decisions on proposals made within the safeguarding zone of an existing installation(s) (including airfields) or for new hazardous installation(s) will be informed by guidance from the relevant safeguarding bodies on the health and safety implications of the proposal, including compatibility with adjacent and nearby land uses and the implications for approach routes in the vicinity. A separate advisory note will be prepared on which hazardous installations have safeguarding zones and how further information relating to these zones can be obtained.”</p>
MAC41	GN.2	<p><i>Amend policy to read:</i></p> <p>“Development will be permitted where relevant criteria are met:</p> <ol style="list-style-type: none"> 1. It is of a good design which pays due regard to local distinctiveness and contributes positively to the local context; 2. It is appropriate to the local character and landscape/ townscape context in terms of layout, scale, form, siting, massing, height, density, mix, detailing, use of materials, landscaping and access arrangements / layout; 3. It incorporates a resource efficient and climate responsive design through location, orientation, density, layout, land use, materials, water conservation and the use of sustainable drainage systems and waste management solutions; 4. It achieves a flexible and adaptable design; 5. It creates an inclusive and accessible environment for users that addresses community safety; 6. It provides a good quality, vibrant public realm that integrates well with adjoining streets and spaces and 7. It contributes to delivering well-designed outdoor space with good linkages to adjoining streets, spaces and other green infrastructure.”
MAC42	GN.3	<p><i>Amend policy to read:</i></p> <p>“Where development generates a directly related need for new or improved infrastructure, services or community facilities and this is not already programmed by a service or infrastructure company, then this</p>

Change No.	Policy or Para No	Proposed Change
		<p>must be funded by the development, and:</p> <ol style="list-style-type: none"> 1. Related in scale and kind to the development; and 2. Provided on site wherever appropriate. In exceptional circumstances contributions may be made to the provision of facilities elsewhere, provided their location can adequately service the development. The timely provision of directly related infrastructure, services and community facilities shall be secured by planning condition(s), the seeking of planning obligation(s) by negotiation, and/or by any other agreement or undertaking. Also in exceptional circumstances, the relocation of critical infrastructure will be permitted, where require as a consequence of fluvial or coastal flooding and/or erosion. <p>The viability of a development will be a key consideration when securing planning obligations and dispensation may be allowed where these requirements cannot be supported by land values.</p> <p>Measures necessary to mitigate the impact of physically deliver a development and ensure that it is acceptable in planning terms will be required in the first instance. Additional contributions will be sought in the following order of priority: Where appropriate contributions may be sought for a range of purposes, including:</p> <ol style="list-style-type: none"> 1) Affordable Housing 2) Recreational and Amenity Open Space 3) Sustainable Transport Facilities 4) Education 5) Community Facilities, including libraries, 6) Regeneration 7) Waste 8) Renewable and low carbon energy 9) Biodiversity 10) Otherwise in line with the Council’s current priorities, and finally 11) Otherwise in line with any further issues identified by the LDP, or by the local community.

Change No.	Policy or Para No	Proposed Change
		<p>In the event that viability considerations indicate that not all the identified contributions can reasonably be required, priority contributions will be determined on the basis of the individual circumstances of each case. In the case of housing developments, priority will be given to affordable housing unless there is an overwhelming need for the available contribution, in whole or in part, to be allocated for some other appropriate purpose/s."</p>
<p>MAC43</p>	<p>GN.3/ 6.23</p>	<p><i>Amend paragraph 6.23 to read:</i></p> <p>"Where necessary, developments will be required to contribute towards infrastructure, landscape improvements and mitigation measures, through planning obligations, unilateral agreement undertaking or a Community Infrastructure Levy as appropriate. The Council is currently assessing its position with regards to the Community Infrastructure Levy and will consider whether to introduce a Charging Schedule for larger projects. Such a Schedule would function alongside the continued use of planning obligations for small-scale infrastructure and to ensure the provision of affordable housing. Requirements for contributions could include affordable housing, transportation, physical infrastructure, surface water drainage separation scheme, flood alleviation schemes, Sustainable Drainage Systems (SuDS), energy schemes, education provision, libraries, community safety, creation or improvements of the leisure network, community facilities and biodiversity/nature conservation."</p>
<p>MAC44</p>	<p>GN.4</p>	<p><i>Amend policy to read:</i></p> <p>"Development proposals should seek to minimise resource demand, improve resource efficiency and utilise seek power generated from renewable resources, where appropriate. They will be expected to be well designed in terms of energy use. ^{80 81}</p> <p>For all major developments:</p> <ol style="list-style-type: none"> 1. Developers must show that they have addressed sustainable resource issues, by reference to accredited assessment schemes, and in the case of commercial developments must undertake an energy use assessment and consider the feasibility of incorporating Combined Heat and Power (CHP) schemes; 2. Energy efficient measures must be incorporated to provide a proportion of their energy requirements from on-site renewable power generation, in line with UK commitments; and 3. Proposals will be required to demonstrate the effective re-use of waste heat and power through co-

Change No.	Policy or Para No	Proposed Change
		<p>location with energy users and / or carbon capture where feasible.</p> <p>Developments which enable the supply of renewable energy through environmentally acceptable solutions will be supported.”</p> <p><i>New footnotes 80 & 81 to read:</i></p> <p>“ ⁸⁰ See Planning Policy Wales (PPW), section 4.12 and Technical Advice Note (Wales) 22 (TAN22) – Planning for Sustainable Buildings</p> <p>⁸¹ Proposed revisions to Part L of the Building Regulations have been subject to consultation. If agreed, the changes would result in many matters relating to achievement of zero carbon / low carbon / improved energy standards becoming a matter for consideration under the Building Regulations. To avoid duplication, a consequential partial phasing out of the sustainable buildings policy currently in TAN22 and associated revisions to PPW are under consideration by Welsh Government.”</p>
MAC45	GN.4/ 6.32	<p><i>Amend paragraph 6.32 to read:</i></p> <p>“Development proposals will be required to show that they have incorporated the highest possible standards of design. Development proposals will be expected to show that energy use has been taken into consideration at the design stage. This is a matter which is currently controlled through planning policy, but regulation may switch to Part L of the Building Regulations during the Plan period.”</p>
MAC46	GN.4/ 6.33	<p><i>Amend paragraph 6.33 to read:</i></p> <p>“Offshore renewable energy developments are normally outside the jurisdiction of the planning system, but such developments may require a landfall site for energy infrastructure. This policy supplements Government policy and guidance to provide further basis for determination of renewable and low-carbon energy proposals. Information on allocations identified as having potential to re-use heat and power, for instance through District Heating Networks, is included in the Development Sites Supplementary Planning Guidance⁸⁶.”</p> <p><i>New footnote 86 to read:</i></p>

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		" ⁸⁶ See the LDP Renewable Energy Study, paragraphs 5.9 and 5.10"																																								
MAC47	GN.5	<p><i>Amend policy to read:</i></p> <p>"The following sites are allocated for employment use:</p> <table border="1" data-bbox="488 478 2096 1394"> <thead> <tr> <th data-bbox="488 478 887 536">Employment Site</th> <th data-bbox="887 478 1288 536">Name</th> <th data-bbox="1288 478 1686 536">Area (ha)</th> <th data-bbox="1686 478 2096 536">Acceptable Uses</th> </tr> </thead> <tbody> <tr> <td data-bbox="488 536 887 632">EMP/040/00003</td> <td data-bbox="887 536 1288 632">Merlins Bridge Creamery Extension</td> <td data-bbox="1288 536 1686 632">5.13</td> <td data-bbox="1686 536 2096 632">B1, B2, B8</td> </tr> <tr> <td data-bbox="488 632 887 727">EMP/040/00005</td> <td data-bbox="887 632 1288 727">Withybush North of Business Park</td> <td data-bbox="1288 632 1686 727">6.09</td> <td data-bbox="1686 632 2096 727">B1, B2, B8</td> </tr> <tr> <td data-bbox="488 727 887 823">EMP/040/00004 and /040/00009</td> <td data-bbox="887 727 1288 823">Withybush East of Business Park</td> <td data-bbox="1288 727 1686 823">15.38</td> <td data-bbox="1686 727 2096 823">B1, B2, B8</td> </tr> <tr> <td data-bbox="488 823 887 951">EMP/086/00001</td> <td data-bbox="887 823 1288 951">Haven Head Business Park Northern Extension Milford Haven</td> <td data-bbox="1288 823 1686 951">3.82</td> <td data-bbox="1686 823 2096 951">B1, B8</td> </tr> <tr> <td data-bbox="488 951 887 1046">EMP/086/LDP/01</td> <td data-bbox="887 951 1288 1046">Adjacent to Marble Hall Road, Milford Haven</td> <td data-bbox="1288 951 1686 1046">6.86</td> <td data-bbox="1686 951 2096 1046">B1, B8</td> </tr> <tr> <td data-bbox="488 1046 887 1142">EMP/086/LDP/02</td> <td data-bbox="887 1046 1288 1142">Milford Haven Gas Storage Site</td> <td data-bbox="1288 1046 1686 1142">0.68</td> <td data-bbox="1686 1046 2096 1142">B1, B8</td> </tr> <tr> <td data-bbox="488 1142 887 1238">EMP/093/00001</td> <td data-bbox="887 1142 1288 1238">North of Honeyborough Industrial Estate</td> <td data-bbox="1288 1142 1686 1238">8.55</td> <td data-bbox="1686 1142 2096 1238">B1, B8</td> </tr> <tr> <td data-bbox="488 1238 887 1334">EMP/034/LDP/01</td> <td data-bbox="887 1238 1288 1334">Goodwick - Former Dewhirst Factory</td> <td data-bbox="1288 1238 1686 1334">0.99</td> <td data-bbox="1686 1238 2096 1334">B1, B8</td> </tr> <tr> <td data-bbox="488 1334 887 1394">EMP/034/LDP/02</td> <td data-bbox="887 1334 1288 1394">Goodwick - Parrog</td> <td data-bbox="1288 1334 1686 1394">0.6</td> <td data-bbox="1686 1334 2096 1394">B1, B8</td> </tr> </tbody> </table>	Employment Site	Name	Area (ha)	Acceptable Uses	EMP/040/00003	Merlins Bridge Creamery Extension	5.13	B1, B2, B8	EMP/040/00005	Withybush North of Business Park	6.09	B1, B2, B8	EMP/040/00004 and /040/00009	Withybush East of Business Park	15.38	B1, B2, B8	EMP/086/00001	Haven Head Business Park Northern Extension Milford Haven	3.82	B1, B8	EMP/086/LDP/01	Adjacent to Marble Hall Road, Milford Haven	6.86	B1, B8	EMP/086/LDP/02	Milford Haven Gas Storage Site	0.68	B1, B8	EMP/093/00001	North of Honeyborough Industrial Estate	8.55	B1, B8	EMP/034/LDP/01	Goodwick - Former Dewhirst Factory	0.99	B1, B8	EMP/034/LDP/02	Goodwick - Parrog	0.6	B1, B8
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Change No.	Policy or Para No	Proposed Change			
		EMP/030/00001	Crymych - adjacent to Riverlea / opposite Llygad-yr-Haul	5.2	B1, B8
		EMP/034/00006	Celtic Link Business Park, near Scleddau	13.47	B1, B2, B8
		EMP/132/00001	A4115, Templeton	2.88	B1, B8
		EMP/053/00001	Old Station Yard, Letterston	1.23	B1, B8
		EMP/000/LDP/01	Carew Airfield	5.6	B1, B8
<p>The specified uses are those that will be permitted on the listed sites. Where appropriate, other classes of employment use or compatible sui generis uses may also be permitted (or combinations of such uses)."</p>					
MAC48	GN.5	<i>Amend policy to include:</i>			
		Employment Site	Name	Area (ha)	Acceptable Uses
		EMP/088/LDP/01	Rushacre Enterprise Park extension	1.32	B1, B8
MAC49	GN.6	<p><i>Amend policy to read:</i></p> <p>"Employment proposals (B1, B2 and B8) on unallocated land will be permitted where:</p> <p>1. — The site is within or well-related to a Settlement Boundary, unless the proposal requires a countryside location, in which case evidence must be provided to support this; and</p> <p>2. — A sequential test has been performed indicating that no allocated employment site can reasonably accommodate the proposed development.</p> <p>1. On sites within settlement boundaries;</p>			

Change No.	Policy or Para No	Proposed Change												
		<p>2. On sites well-related to a settlement boundary if no sites within the same settlement boundary exist to serve the development;</p> <p>3. In countryside locations only if no other suitable sites exist and the enterprise requires such a location; and in all cases provided no allocated sites can reasonably accommodate the proposed development.”</p>												
MAC50	GN.7	<p><i>Amend policy to read:</i></p> <p>“The following sites are allocated for mixed use development, within which a considerable proportion of the development shall be employment-related:</p> <table border="1" data-bbox="486 667 2101 906"> <thead> <tr> <th data-bbox="486 667 1023 727">Mixed Use Site</th> <th data-bbox="1023 667 1561 727">Name</th> <th data-bbox="1561 667 2101 727">Area (ha)</th> </tr> </thead> <tbody> <tr> <td data-bbox="486 727 1023 788">MXU/040/01</td> <td data-bbox="1023 727 1561 788">Haverfordwest - Old Hakin Road</td> <td data-bbox="1561 727 2101 788">1.31</td> </tr> <tr> <td data-bbox="486 788 1023 849">MXU/048/01</td> <td data-bbox="1023 788 1561 849">Johnston - Arnold's Yard</td> <td data-bbox="1561 788 2101 849">5.47</td> </tr> <tr> <td data-bbox="486 849 1023 906">MXU/086/01</td> <td data-bbox="1023 849 1561 906">Dale Road, Hubberston</td> <td data-bbox="1561 849 2101 906">4.64</td> </tr> </tbody> </table>	Mixed Use Site	Name	Area (ha)	MXU/040/01	Haverfordwest - Old Hakin Road	1.31	MXU/048/01	Johnston - Arnold's Yard	5.47	MXU/086/01	Dale Road, Hubberston	4.64
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MAC51	GN.7/ 6.37	<p><i>Amend paragraph 6.37 to read:</i></p> <p>“Mixed use development may combine employment and other compatible uses (such as residential, leisure and community facilities) on the same site. It may include live – work units, but might alternatively or additionally include a mix of different land use(s) within a single site. The purpose of this policy is two-fold – firstly, by providing a range of uses, it will encourage sustainable and thriving communities where people can undertake more than one activity within a single site, such as living, working and recreation. Secondly, it may stimulate investment in employment development in conjunction with the development of residential or other forms of development on the site. The allocations of this policy will also contribute towards the supply of suitable employment land across the Plan area, helping to meet the requirements of section 7.5 and the introduction to Figure 7.1 of Planning Policy Wales (Edition 5, November 2012) and Technical Advice Note 6, para 3.1.4.”</p>												
MAC52	GN.7/ 6.37a	<p><i>Insert a new paragraph after paragraph 6.37:</i></p> <p>“6.37a To ensure that proposals on each mixed use site include a proportion of employment uses,</p>												

Change No.	Policy or Para No	Proposed Change
		<p>Supplementary Planning Guidance (SPG) will be prepared for each site, taking into account viability issues and also providing an indicative mix of uses to inform the submission of any subsequent planning application. The SPG would be subject to local consultation in the normal manner."</p>
<p>MAC53</p>	<p>GN.7/ 6.37b</p>	<p><i>Insert a new paragraph after paragraph 6.37a:</i></p> <p>"6.37b Where applications come forward on mixed use sites in advance of SPG being adopted the proposals will be required to demonstrate the scheme will provide considerable employment land unless economic viability considerations justify a more modest provision. Planning conditions or legal obligations will be used to ensure that schemes approved under this policy deliver the envisaged employment development element. Where employment uses on mixed use sites (including those within a live-work unit) are proposed for change to another use, the requirements of policy GN.8 must be satisfied."</p>
<p>MAC C</p>	<p>GN.7/ 6.37c</p>	<p><i>Insert a new paragraph after paragraph 6.37b:</i></p> <p>"6.37c Mixed-use proposals on non-allocated sites will be considered against the relevant General policies contained within the Plan for the combination of uses proposed. The Council is supportive of mixed-use proposals, live-work units and home working where the location proposed is appropriate for that combination of use. Applicants will be required to demonstrate compliance with all relevant policies, for example, mixed-use proposals containing an element of residential use will only be considered suitable in locations where residential use would be considered appropriate. The Council recognises that small-scale employment premises can often co-exist within or adjacent to residential development and that such co-location may in many instances bring sustainability benefits, provided that issues such as amenity can be satisfactorily addressed."</p>
<p>MAC54</p>	<p>GN. 8/ 6.38</p>	<p><i>Amend paragraph 6.38 to read:</i></p> <p>"The purpose of this policy is to ensure that existing sites used for employment purposes are not lost to (Use Classes B1, B2, B8) or A2 (office) uses are not lost to other uses unless there is a clear justification for accepting an alternative use. This will help to ensure that an adequate supply of employment sites remains available in the plan area. Loss of such sites is only permitted where one of the policy criteria can</p>

Change No.	Policy or Para No	Proposed Change
		be satisfied.”
MAC55	GN.8/ 6.39	<i>Amend paragraph 6.39 to read:</i> “Allocated employment sites and the most significant existing employment sites are specifically protected from such changes of use, with this policy providing similar protection for unallocated sites, but with a degree of flexibility provided by the policy criteria.”
MAC56	GN.8/ 6.40	<i>Amend paragraph 6.40 to read:</i> “To demonstrate that an existing use is inappropriate for a locality, a developer should provide evidence that the existing use is inappropriate in terms of its nature, scale and impact on the local road network or on local amenity.”
MAC57	GN.8/ 6.41	<i>Amend paragraph 6.41 to read:</i> “ To provide justification for a non-employment proposal In relation to criterion 2 , the availability of adequate alternative employment site provision in the vicinity must be demonstrated.”
MAC58	GN.8/ 6.42	<i>Amend paragraph 6.42 to read:</i> “Evidence of a lack of viability should include evidence of a lack of financial profit (for example from published accounts) and evidence of an inability to sell / rent the site. In order to demonstrate that a site is unviable for sale or for letting, the developer will be expected to demonstrate that they have marketed the site at an appropriate price, at locations and for a length of time appropriate to the degree of speciality of such a property and the prevailing market conditions. Further advice will be provided (in a Development Management Policy Note) on marketing requirements, including length of time on the market. ”
MAC59	GN.8/ 6.44	<i>Amend paragraph 6.44 to read:</i> “Where a change of use from an employment use to a housing use is deemed acceptable, the dwellings added to stock as a consequence will be counted as windfall development (see Appendix 4 3)”
MAC60	GN.9/ 6.45	<i>Amend paragraph 6.45 to read:</i> “This policy will support the Pembrokeshire economy by facilitating business growth in appropriate cases. Proposals for extensions to employment sites must include information on the scale, proposed increase in

Change No.	Policy or Para No	Proposed Change
		footprint and, where appropriate, unit numbers.”
MAC61	GN.10	<p><i>Amend policy to include footnote (criterion 2):</i></p> <p>“Diversifying the range of economic activities on a farm will be permitted where the following criteria are met:</p> <ol style="list-style-type: none"> 1. The proposed use helps to support the continued agricultural operation of the farm; 2. If a new building is justified⁸⁸ it should be sited in or adjacent to an existing group of buildings; and 3. If a retail use is proposed the scale and scope will not harm the vitality and viability of retail facilities in any nearby settlements, or undermine the retail hierarchy.” <p><i>New footnote 87 to read:</i></p> <p>“⁸⁸ see Welsh Assembly Government Technical Advice Note 6: Planning for Sustainable Rural Communities, July 2010, section 3.7.”</p>
MAC62	GN.11/ 6.52	<p><i>Amend paragraph 6.52 to read:</i></p> <p>“When considering the conversion of agricultural buildings to residential uses or live-work units the building must be traditional in character and domestic in scale, structurally sound, of permanent and substantial construction and capable of conversion without major or complete reconstruction. Traditional agricultural buildings are defined as:”</p>
MAC63	GN.11/ 6.53	<p><i>Amend paragraph 6. 53 to read:</i></p> <p>“Where planning permission for holiday accommodation is granted this will be subject to conditions and/or legal agreement to restrict the occupation of the building to holiday use. There are circumstances where the full-time residential use of a conversion would be inappropriate because of its provision of a reduced standard of living conditions in terms of low level of privacy or amenity provision. In these situations holiday occupancy conditions, limiting the time a single household may stay in a unit and return by, may be applied.”</p>
MAC64	GN.12	<p><i>Amend policy to read:</i></p> <p>“Within the Town Centres identified on the Proposals Map development will be permitted providing the</p>

Change No.	Policy or Para No	Proposed Change
		<p>following criteria are met:</p> <ol style="list-style-type: none"> 1. It falls within use classes A1, A2, A3, B1, C1, C3, D1 or D2 of the use Classes Order or is a sui generis use normally found in shopping centres, or any mixed use comprising one or more of these use classes; 2. The proposal would not create concentration of more than a third of non A1 (retail) uses within a Primary Frontage as defined on the Proposals Map; 3. The proposed development does not undermine or prevent the development of an identified retail allocation within the Town Centre; and 4. It does not propose a change of use to residential use (C3) on a ground floor in a Primary or Secondary Frontage."
MAC65	GN.12/ 6.55	<p><i>Amend paragraph 6.55 to read:</i></p> <p>"Within the Town Centres, Primary Frontages have been identified where the strongest groups of retail (A1) uses exist and Secondary frontages have been identified in areas with a broader mix of uses. It is important that A1 uses remain predominant in Primary Frontage areas as they are key to retaining the vitality and viability of these centres. As a guide no more than 30% of the floorspace linear frontage within a Primary Frontage in a shopping centre should be non A1 use class. In Secondary Frontages changes of use to other uses apart from A1 will be acceptable provided they do not propose a change of use of the ground floor to residential use."</p>
MAC66	GN.12/ 6.57	<p><i>Amend paragraph 6.57 to read:</i></p> <p>"Retail allocations have been identified within certain Town Centres, with a presumption in favour of their redevelopment for retail. Exemplary high quality design that integrates positively with existing development will be expected on these sites. GN.14 'Retail Allocations' lists individual allocated sites. "</p>
MAC67	GN.13 GN.14	<p><i>Amend and re-order within the Plan:</i></p> <p><i>Policy GN.13 to become GN.14; GN.14 becomes GN. 13</i></p>
MAC68	GN.14	<p><i>Amend GN.14 policy title:</i></p> <p>"GN.14 Major Out-Of-Town Centre Development"</p>

Change No.	Policy or Para No	Proposed Change
MAC69	GN.15	<p><i>Amend policy to read:</i></p> <p>“The development, or extension, of small scale retail facilities will be permitted where:</p> <ol style="list-style-type: none"> 1. The proposal is well located to serve the needs of the community within a settlement boundary; and” 2. The proposed use will not impact negatively on the vitality and viability of any Town or Local Retail Centre.”
MAC70	GN.15/ 6.65	<p><i>Amend paragraph 6.65 to read:</i></p> <p>“Proposals above this scale will be assessed under GN.13 Major Out of Town Development and the National Planning Policy Tests established in Planning Policy Wales (Edition 5, November 2012). Proposals for a change of use which would result in the loss of retail provision will be assessed in accordance with national policy and Policy GN.33 Community Facilities.”</p>
MAC71	GN.16	<p><i>Amend policy to read:</i></p> <p>“A. New visitor attractions and commercial recreation and leisure proposals will be permitted where both the following criteria are met:</p> <ol style="list-style-type: none"> 1. The site is well located in relation to A or B class roads and/or, rail stations and/or bus routes; and 2. The site is within or immediately adjoins a settlement, unless the proposal requires a countryside location, in which case evidence must be provided to support this. <p>B. Extensions to the area, or an intensification, of the visitor, commercial recreation or leisure facility will be permitted where the scale and nature of the facility and of the proposed extension would be compatible with its location.”</p>
MAC72	GN.16/ 6.67	<p><i>Amend paragraph 6.67 to read:</i></p> <p>“This policy aims to support new visitor attractions and leisure facilities that are well located to serve both residents and visitors. Visitor attractions and leisure facilities should, where practicable, be located on previously developed land. Proposals to extend existing visitor and commercial recreation and leisure proposals will be assessed under GN.9 Extensions to Employment Sites.”</p>
MAC73	GN.17	<p><i>Amend policy to read:</i></p>

Change No.	Policy or Para No	Proposed Change
		<p>“Proposals for self-catering, serviced or hotel accommodation excluding caravan accommodation will be permitted where:</p> <p>A. For new developments either</p> <p>1) It is within or is well-related to a Town, Service Centre or Service Village;</p> <p>Or</p> <p>2) The proposal is for the conversion of an existing dwelling, a historic building or conversion or a traditional agricultural building.</p> <p>B. For extensions:</p> <p>The scale and nature of the accommodation, including the extension, would be compatible with its location.”</p>
MAC74	GN.17/ 6.68	<p><i>Amend paragraph 6.68 to read:</i></p> <p>“Self catering and serviced accommodation comprises non caravan accommodation. Self catering accommodation comprises non caravan accommodation including includes rented flats, houses, bungalows and chalets the primary purpose for which is holiday letting includes any building for which the primary purpose is self contained holiday letting. Serviced development relates to accommodation where an element of service is provided, such as for bed and breakfast and hotel businesses.”</p>
MAC75	GN.17/ 6.69	<p><i>Amend paragraph 6.69 to read:</i></p> <p>“Self-catering or serviced development can be appropriate either where it is within or well related to a settlement or where it makes use of an existing dwelling. It may also be appropriate for a historic building for example historic buildings may be appropriate for boutique hotels which are part of diversifying and broadening the quality visitor accommodation on offer in the county. The reasoned justification for GN.27 Residential Development sets out circumstances where conversion of historic buildings would be acceptable for residential use. Traditional agricultural buildings when converted may also be appropriate for self catering or catered development. GN.11 Conversion or Change of Use of Agricultural Buildings sets out criteria for conversion or change of use of agricultural buildings.”</p>
MAC76	GN.17/ 6.72	<p><i>Amend paragraph 6.72 to read:</i></p> <p>“Planning conditions will be imposed where appropriate to ensure that facilities remain as holiday</p>

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		<p>accommodation units and are not used as permanent accommodation or occupied as a primary residence. In these situations holiday occupancy conditions, limiting the time a single household may stay in a unit and return by, may be applied.”</p>
<p>MAC77</p>	<p>GN.18</p>	<p><i>Amend policy to read:</i></p> <p>“A. New touring caravan and tent sites will be permitted whereif they fall outside the Community Council areas of Amroth, St Florence, East Williamston, Penally, Saundersfoot and St Mary out Liberty and provided that either:</p> <ol style="list-style-type: none"> 1. The site is within or well-related to a settlement identified in the hierarchy as a Town, Service Centre or Service Village; <p>Or</p> <ol style="list-style-type: none"> 2. The site is within or well-related to a Local Village and will provide a community facility not present within the existing settlement; and in all cases: 3. The site is outside the Community Council areas of Amroth, St Florence, East Williamston, Penally, Saundersfoot and St Mary out Liberty. <p>B. Extensions to touring caravan and tent sites will be permitted where the following criteria are met:</p> <ol style="list-style-type: none"> 4. The enlargement of the area of a touring caravan or tent site will be permitted where it an approved site would achieve a demonstrable overall environmental improvement both for the site and its setting in the surrounding landscape.; and 2. Increases in touring pitch numbers <p>C. An increase in the number of touring caravan or tent pitches will be permitted where the site is outside the Community Council areas of Amroth, St Florence, East Williamston, Penally, Saundersfoot and St Mary out Liberty and would achieve a demonstrable overall environmental improvement both for the site and its setting in the surrounding landscape.”</p>

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MAC78	GN.18/ 6.74	<p><i>Amend paragraph 6.74 to read:</i></p> <p>“Any new touring or tent sites must be within or well-related to a settlement identified in the hierarchy as a Service Village, Service Centre or Town in order to achieve these objectives. This will ensure that visitors are able to access easily those services and facilities available in nearby settlements, for example walking to nearby pubs or restaurants. A definition of well-related is provided in the glossary. Any proposed sites must be within or in physical proximity to the settlement and be seen as part of the same landscape as the settlement. In exceptional circumstances new New sites will be permitted where they are within or well-related to a settlement identified as a Local Village in the hierarchy, where evidence is provided that the site will provide a service or facility such as a shop not otherwise available in the settlement and which will be available and accessible to the local community to use. In such instances planning conditions requiring that the facility be open to the general public will be attached to consents.”</p>
MAC79	GN.19	<p><i>Amend policy to read:</i></p> <p>“A. Proposals for new static caravan and chalet sites or extensions to existing sites by an increase in the number of pitches will be permitted where:</p> <ol style="list-style-type: none"> 1. The site is within the Settlement boundary of a defined settlement. <p>B. The enlargement of the area of an approved site a static caravan or chalet site will be permitted where it would achieve a demonstrable overall environmental improvement both for the site and its setting in the surrounding landscape.</p> <p>C. Upgrading of touring pitches to static pitches will be permitted where:</p> <ol style="list-style-type: none"> 1. The site is well-related to a settlement identified in the hierarchy as a Service Village, Service Centre or Town; or 2. The site is well-related to a Local Village, and will provide a community facility not present within the existing settlement; and and in all cases: 3. There is no overall increase in the number of pitches; and 4. The site is outside the Community Council areas of Amroth, St Florence, East Williamston, Penally,

Change No.	Policy or Para No	Proposed Change
		<p>Saundersfoot and St Mary out Liberty.</p> <p>3. In all cases the following should apply:</p> <p>i) There is no overall increase in the number of pitches; and</p> <p>ii) There would be a demonstrable overall environmental improvement both for the site and its setting in the surrounding landscape; and</p> <p>iii) The site is outside the Community Council areas of Amroth, St Florence, East Williamston, Penally, Saundersfoot and St Mary out Liberty."</p>
MAC80	GN.19/ 6.79	<p><i>Amend 6.79 to read:</i></p> <p>"Static caravans play an important role in Pembrokeshire’s visitor economy⁸⁸; however bed space provision of static caravans / pitches across Pembrokeshire consistently exceeds demand. Evidence from monitoring suggests that current static caravans situated on sites are not fully occupied and that further capacity exists under current consents for a significant number (365) of additional caravans to be added to existing sites. Some static caravan sites prove visually intrusive as such may be detrimental to the overall quality and viability of tourism in Pembrokeshire. To prevent further detrimental impacts it is considered inappropriate to allow for new sites to be developed except in settlements."</p>
MAC81	GN.19/ 6.80	<p><i>Insert a new paragraph after 6.80 to read:</i></p> <p>"6.80a Planning conditions will be imposed where appropriate to ensure that facilities remain as holiday accommodation units and are not used as permanent accommodation or occupied as a primary residence. In these situations holiday occupancy conditions, limiting the time a single household may stay in a unit and return by, may be applied."</p>
MAC82	GN.21	<p><i>Delete policy GN.21 which reads:</i></p> <p>GN.21 Seasonal and Holiday Occupancy</p> <p>Where a new unit of holiday accommodation is proposed, development will only be permitted where the unit is occupied / available for holiday use and for no other purposes.</p> <p>6.85 The aim of this policy is to ensure that units of holiday accommodation remain as such and that they are not occupied permanently or at inappropriate times of the year.</p>

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		<p>6.86 Seasonal occupancy conditions restricting the use of a unit during certain months of the year may be appropriate where there are seasonal landscape implications for example on touring caravan pitches, if during winter months the visual impact of the pitch is likely to become more prominent.</p> <p>6.87 There are circumstances where the full-time residential use of a building and associated land may lead to a more intensive manifestation of domestic activity than holiday use which may be harmful to landscape character. In those situations holiday occupancy conditions, limiting the time a single household may stay in a unit and return by, may be applied.</p>
MAC83	GN.22/ 6.92	<p><i>Amend paragraph 6.92 to read:</i></p> <p>“At Fishguard Harbour there are proposals to build a new is consent for a marina development. and The landward extent of this is shown on the Proposals Map. At Pembroke Dock (West Llanion Pill) there is a consented marina development known as Martello Quays, also shown on the Proposals Map. Additionally this policy provides criteria for evaluation of proposals for new and extended marinas at other locations.”</p>
MAC84	GN.23	<p><i>Amend policy to read:</i></p> <p>“Where new development is permitted in an area of mineral resource, prior extraction of any economic reserves of the mineral must be achieved, wherever feasible appropriate in terms of economic feasibility and environmental and other planning considerations, prior to the commencement of the development.”</p>
MAC85	GN.23/ 6.94	<p><i>Amend paragraph 6.94 to read:</i></p> <p>“The purpose of this policy is to avoid, wherever feasible, inappropriate sterilisation of the mineral resource where development is proposed. Market demand for the material beneath the development site at the time of development will be a factor in determining whether prior extraction is feasible. There may also be circumstances where the desirability of retention of on-site features of a site (for instance existing trees and hedge banks) might preclude prior extraction.”</p>
MAC86	GN.23/ 6.94	<p><i>Amend paragraph 6.94a to read:</i></p> <p>–“Safeguarding of the mineral resource of the plan area is undertaken by this Plan in accordance with Welsh</p>

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		policy requirements and therefore does not need a separate LDP policy. Safeguarding covers the outcrop area of the economic mineral resource but excludes settlements. "
MAC87	GN.26	<i>Amend policy title to read:</i> "Buffer Zones around Mineral Working Sites"
MAC88	GN.26/ 6.101	Amend paragraph 6.101 to read: "Buffer zones around mineral working sites are shown on the Proposals Map and are used to overcome conflicts between mineral workings and other land uses. These Buffer Zones are distinct from those associated with the mineral safeguarding zones required by Welsh policy, which are also shown on the LDP Proposals Map. The buffer zones introduced by this policy are identified on the Proposals Maps and are placed around all active mineral workings and also inactive (dormant) quarries. Proximity of mineral workings and sensitive land uses (in particular housing, hospitals and schools) within Buffer Zones is not normally permitted because of the potential negative impact of one type of development on the other. These arise because of noise and dust from mineral extraction and processing and vibration from blasting operations. Buffer Zones provide areas of protection around permitted and proposed mineral workings. Some types of less sensitive development (possibly including industry, offices and ancillary development related to mineral working) may be acceptable in a buffer zone but development, which would be sensitive to mineral working, including housing, hospitals and schools will, in most cases, be resisted. A further exception to the general approach is listed in Minerals Planning Policy Wales (paragraph 40), where the site of the new development in relation to the mineral operation would be located within or on the far side of an existing built up area which already encroaches into the buffer zone. This has been taken into consideration in preparing this Plan's site-specific proposals."
MAC89	GN.27/ 6.108	<i>Amend paragraph 6.108 to read:</i> "Redevelopment or replacement can allow the development of housing accommodation which is better adapted to meeting the present and future housing needs and contribute to energy efficiency and reduced carbon dioxide levels as long as the quality of the environment is enhanced. In some situations the cost of renovation of substandard properties is prohibitive. The new dwelling should reflect the character of the existing dwelling and relate well to other dwellings in the area and the surrounding landscape. The new dwelling should be located on or close to the siting of the original dwelling. The reuse of materials from the

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		demolished dwelling will be encouraged. The existing dwelling should not be a Listed Building, or an important building that defines the character of an area."
MAC90	GN.27/ 6.110	<i>Amend paragraph 6.110 to read:</i> "Conversions of historic buildings to residential use will be permitted where the applicant demonstrates exemplary standards of design and sustainability. Such buildings can make a significant contribution to the aesthetic quality of urban and rural landscapes and the proposal must demonstrate that it complements and enhances its surroundings. Proposals for conversion of historic buildings will be permitted subject to the structure being capable of conversion without extensive alteration and retaining substantially the original form, with few changes to cosmetic detail. Such buildings may include town or country houses, religious buildings and former military premises. Any conversion of an historic building must preserve and enhance external and internal features that are indicative of its former uses. The conversion of agricultural buildings is dealt with under a separate policy GN.11 Conversion or Change of Use of Agricultural Buildings. "
MAC91	GN.28	<i>Amend policy:</i> <i>See Annex 1.</i>
MAC92	GN.29	<i>Amend policy and text to read:</i> GN.29 Local Needs Affordable Housing Provision Local needs affordable housing will be a requirement: 1. at a rate of 25% in Towns, Service Centres and Service Villages; 2. at a rate of 50% in Large Local Villages; and 3. for all new dwellings in Small Local Villages. 6.116 The need for affordable housing is acute in Pembrokeshire, with the Local Housing Market Assessment indicating it is the least affordable county in Wales and a survey by Halifax Estate Agents suggesting an average income to house price ratio of 7.4:1 in 2008. This is further supported by evidence from housing waiting list data and Community Council surveys. The Welsh Government has made the delivery of affordable housing a priority for the planning system, and a community's need for affordable housing is a material planning consideration.

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		<p>6.117 The expected percentage of affordable homes on each qualifying site is derived from extensive and comprehensive testing of housing viability, undertaken in 2010. The viability tests, conducted using the 3 Dragons Development Appraisal Toolkit, have regard to unique site characteristics and allow for changes to the state of the economy and the economics of development. Where on site provision is impractical, for small scale developments (less than 5 in a Town, Service Centre or Service Village, less than 2 in a Large Local Village) or for developments where otherwise the percentage would be reduced by ‘rounding down’ the Council will seek a commuted sum contribution to support off site affordable housing provision. Where a developer can demonstrate that the expected percentage is not deliverable, they may negotiate with the LPA to ensure delivery of a reasonable number of affordable homes, which contributes to meeting the need for affordable homes in Pembrokeshire. In local villages the objective of residential development is to meet the need for more affordable homes in rural areas and therefore concerns over the viability of development do not justify any relaxation of the policy.</p> <p>6.118 The Authority will not accept piecemeal development of large sites, whether allocated or otherwise, as a means of avoiding the requirement for affordable housing. It is anticipated that approximately 1450 new affordable homes will be provided over the Plan period.</p> <p>6.119 The affordable housing provided under this policy must be available in perpetuity for local people in need of affordable housing within the community and permission will be subject to conditions or a planning obligation to ensure that this will be the case. Definitions of “local” and “in need” can be found in the Affordable Housing SPG. Evidence of need for affordable housing will be determined using the Common Housing Register and Community Council surveys. Further information on the form of affordable housing (either affordable rented or low cost home ownership) and mechanisms linked to delivery are also provided in the SPG on Affordable Housing.</p> <p>“GN.29 Local Needs Affordable Housing</p> <p>Local needs affordable housing will be sought on all housing developments. Indicative targets for provision on allocated sites are set out in Policy GN.28, and on unallocated sites the provision shall be as follows:</p> <p>1 - In Towns, Service Centres and Service Villages 10% of dwellings proposed will be affordable.</p>

Change No.	Policy or Para No	Proposed Change
		<p>2 - In Large Local Villages 50% of the dwellings proposed will be affordable.</p> <p>3 - In Small Local Villages all new dwellings must be affordable.</p> <p>Where it is demonstrated that the provision of an affordable dwelling on site is not possible¹¹² a commuted sum contribution for affordable housing will be sought. The commuted sum shall be related to the contribution rates set out above and charged on the basis of floorspace (per sq. metre).</p> <p>The authority may seek a higher percentage contribution on any site where local circumstances and/or recent developments in the area suggest it would be financially viable. Where a sustained positive change in the financial viability of development can be demonstrated through monitoring¹¹³ the local authority will seek a higher percentage contribution towards affordable housing. In Towns, Services Centres and Service Villages a provision of affordable housing below the target figure may be appropriate where this is supported by economic viability evidence.</p> <p>6.116 The need for affordable housing is acute in Pembrokeshire, evidenced by housing waiting list data, Local Housing Market Assessments and Community Council surveys. The Welsh Government has made the delivery of affordable housing a priority for the planning system¹¹⁴, and a community's need for affordable housing is a material planning consideration. It is anticipated that at least 980 new affordable homes will be provided over the Plan period.</p> <p>6.117 The authority will seek a material or financial contribution to affordable housing from all new open market housing developments in order to maximise the delivery of affordable housing in an effort to meet the existing and newly-arising need. Where the site is large enough the developer will be expected to provide affordable housing on-site, in accordance with percentage</p>

Change No.	Policy or Para No	Proposed Change
		<p>targets stated in GN.28 (for housing allocations) or GN.29 (for windfall sites). These targets are derived from housing viability tests and form an indicative target. The viability tests, conducted using the 3 Dragons Development Appraisal Toolkit, have regard to unique site characteristics and allow for changes to the state of the economy and the economics of development. Where a developer can demonstrate that the expected percentage is not deliverable, they may negotiate with the LPA to ensure delivery of a reasonable number of affordable homes, which contribute to meeting the need for affordable homes in Pembrokeshire. In Local Villages the objective of residential development is to meet the need for more affordable homes in rural areas and therefore concerns over the viability of development do not justify any relaxation of the policy.</p> <p>6.118 If on site provision is impractical, for example on small scale developments or where through ‘rounding’ a large site is left with a fraction of an affordable dwelling to provide, the Council will seek a commuted sum contribution to support off site affordable housing provision.</p> <p>6.119 All affordable housing must be available in perpetuity for people in need of affordable housing and any planning permission will be subject to conditions or a planning obligation to ensure that this will be the case. The Authority will not accept piecemeal development of large sites, whether allocated or otherwise, as a means of avoiding the requirement for affordable housing. Affordable Housing SPG contains important details of tenure and type of affordable housing sought by the authority. It also establishes how the contribution percentage rate may be adjusted and how a commuted sum will be applied.”</p> <p><i>New Footnotes 112, 113 & 114 to read:</i></p> <p>¹¹² Such as on small sites where an entire affordable dwelling cannot be provided</p> <p>¹¹³ Indicators and timeframes for implementing changes to the target will be contained in Affordable Housing Supplementary Planning Guidance</p> <p>¹¹⁴ Planning Policy Wales (Edition 5, November 2012), Technical Advice Note 2 (2006), Technical Advice Note 6, Section 4.2 (July 2010)”</p>

Change No.	Policy or Para No	Proposed Change
MAC93	GN.32b	<p><i>Amend policy to read:</i></p> <p>“Outside Settlement Boundaries Proposals for new permanent or transit gypsy traveller sites or extensions to existing authorised sites will only be permitted where it is demonstrated that the proposed development:</p> <ol style="list-style-type: none"> 1. cannot be accommodated on an existing authorised site and is to meet locally arising need or the need of families with a local connection 2. is accessible to existing community, social, educational and other services and 3. is sensitively sited in the landscape and satisfactory landscaping is provided.”
MAC94	GN.32b/ 6.129	<p><i>Amend paragraph 6.129 to read:</i></p> <p>“Proposals for new sites or extensions to existing sites must have good access to services, particularly essential services such as primary schools or and doctors surgeries.”</p>
MAC95	GN.32b/ 6.130	<p><i>Amend paragraph 6.130 to read:</i></p> <p>“Site design must combine a layout which will meet the needs of the inhabitants of the site, meet standards for pitch separation and screen mitigate the visual impact of the development on the landscape.”</p>
MAC96	GN.32b/ 6.131	<p><i>Amend paragraph 6.131 to read:</i></p> <p>“Gypsy Traveller sites require good road access, particularly those which have an element of, or are entirely transit sites. GN1 General Development Policy will therefore be a key consideration for any proposal. Another criterion of particular importance is the potential impact on amenity of any surrounding properties. GN.1 General Development Policy will therefore be a key consideration for any proposal.”</p>
MAC97	GN.33	<p><i>Amend footnote 117 to read:</i></p> <p>“Community facilities are any facilities that serve the community and contribute to the quality of everyday life, including local shops, schools, libraries, religious buildings, sports halls and leisure centres, cinemas and theatres, community halls, public houses, post offices and health centres, playgrounds, cemeteries and small scale community based reuse and recycle facilities (including bring sites)”</p>
MAC98	GN.33/	<p><i>Amend paragraph 6.136 to read:</i></p>

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	6.136	<p>“Acceptable evidence that the facility is no longer required can include any of the following:</p> <ul style="list-style-type: none"> i) Resolution of County or Community Council to close the facility. ii) That the cost of refurbishment, repair or running costs is greater than the income the facility can generate and no suitable funding is available for its support. iii) Lack of reasonable use in the past e.g. demonstration of very limited use in hours or by very few people. iv) Lack of demand by prospective operators as evidenced by appropriate marketing for sale or rent for 6 months or more.”
MAC99	GN.34	<p><i>Amend policy to read:</i></p> <p>“A. Outdoor recreation areas, which include public open spaces, leisure routes and recreational facilities, are protected. From inappropriate development.</p> <p>Development will be permitted on outdoor recreation areas where:</p> <ul style="list-style-type: none"> 1. It can be demonstrated by the applicant that The area has no significant public recreational value; or 2. A suitable replacement facility is to be made available; or 3. The recreational facilities will be enhanced through the redevelopment of part of the site. <p>B. New outdoor recreation area(s) will be permitted where the following criteria are met:</p> <ul style="list-style-type: none"> 1. It is well located to serve the community needs; 2. It is appropriate size, design and form to meet the needs of the people it is intended to serve; and 3. Provision is made for the future management and maintenance of the site/route.”
MAC100	GN.35	<p><i>Amend policy to read:</i></p> <p>“Development which would adversely affect the appearance, character or local amenity value of areas of public and private open space will not normally be permitted. In exceptional circumstances, where the proposal will bring clear social and/or economic benefits to the local community and make a positive contribution to the built environment, development may be permitted where it can be demonstrated that no suitable alternative site is available.”</p>

Change No.	Policy or Para No	Proposed Change
MAC101	GN.35a	<p><i>New policy to read:</i></p> <p>“GN 35A Green Wedges</p> <p>In order to prevent the coalescence of settlements Green Wedges have been identified at the following locations:</p> <ul style="list-style-type: none"> • Haverfordwest / Merlins Bridge (east) • Haverfordwest / Merlins Bridge (west) • Haverfordwest / Portfield Gate • Neyland / Llanstadwell • Fishguard / Goodwick • Fishguard / Lower Town • Tenby / Penally <p>These areas have particular importance in maintaining the distinct identities of separate communities. Within the Green Wedges there will be a general presumption against inappropriate development.</p> <p>6.47a Green Wedges play an important role in maintaining Pembrokeshire’s landscape setting and preserving openness. Land on the edge of the Hub Towns and tourism centres is vulnerable to the pressure of development, this in turn can result in the urbanisation of rural areas, coalescence of settlements and loss of important green space. This policy aims to identify and protect such vulnerable areas from inappropriate development, as defined in national policy¹²⁰, with development proposals determined in accordance with PPW paragraphs 4.8.14- 4.8.18.</p> <p>6.47b Specific details of each of the designations are contained in LDP Background paper ‘Green Wedges’ September 2010. The spatial extent of the Green Wedge allocations is shown on the LDP Proposals Map.”</p>

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		<p><i>New Footnote 120 to read:</i> “¹²⁰ Planning Policy Wales (Edition 5, November 2012), section 4.8.”</p>
MAC102	GN.36/ 6.148	<p><i>Amend paragraph 6.148 to read:</i> “The protection and enhancement of biodiversity is fundamental to the high environmental quality of Pembrokeshire. Planning proposals that affect internationally, nationally, regionally and locally designated sites, shown on the Proposals Map, are a material consideration when considering a development proposal and will be assessed in accordance with national planning policy and guidance, working with stakeholders and statutory consultees, and using appropriate data sources. Development Proposals with potential for adverse effect on internationally or nationally important sites will require detailed assessment before progressing. Specifically if any development proposal is likely to have a significant effect on a European, protected site or species it shall be subject to an Appropriate Assessment of the implications in relation to the site’s conservation objectives.”</p>
MAC103	N/A	<p><i>Amend footnote 122 to read:</i> “CCW LANDMAP and Protected Sites Maps, Core Management Plans of relevant European sites, Phase 1 Habitats Survey data, and the West Wales Biodiversity Information Centre geo-database of species records and habitat information.”</p>
MAC104	GN.36/ 6.148	<p><i>Amend footnote 124 to read:</i> “Technical Advice Note 5: Nature Conservation and Planning 2009, section 5.3 6.3”</p>
MAC105	GN.37/ 6.155	<p><i>Delete paragraph 6.155:</i> “Should the importance of archaeological remains, be outweighed by other material considerations and insufficient to require their physical preservation in situ, the Authority will ensure that the developer has made appropriate and satisfactory provision for the excavation and/or recording and publication of a record of the remains, prior to development commencing. Whenever possible, development should be undertaken in a way that enhances surviving archaeological remains.”</p>
MAC106	GN.38	<p><i>Amend part of policy to read:</i></p>

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		<p><u>“Local road improvement schemes:</u></p> <p>3. Northern Distributor Network – Bulford Road link (Johnston to Tiers Cross)</p> <p>4. Pembroke Community Regeneration Project Phase 1 (Bridgend Terrace diversion) and Phase 2 (Bush Hill to Monkton bypass route)</p> <p>5. Blackbridge Access Improvement and Waterston bypass¹³¹</p> <p>6. Southern Strategic Route – A 477 Nash Fingerpost to Energy Site corridor enhancement”</p> <p><i>New Footnote 131 to read:</i></p> <p>“¹³¹ Development at this site will be required to comply with the requirements of the Conservation of Habitats and Species Regulations 2010.”</p>
MAC107	GN.38/ 6.158	<p><i>Amend paragraph 6.158 to read:</i></p> <p>“It is not considered appropriate for this plan to identify aspirational proposals where there is no certainty of implementation within the plan period. Any significant new proposals for new routes or improvements may trigger partial or early review of the Plan.”</p>
MAC108	GN.39/ 6.161	<p><i>Reinstate paragraph 6.161 and amend to read:</i></p> <p>“6.161 The Civic Amenity site at the Salterns, Tenby, is constrained by size. It serves communities within and outside the Pembrokeshire Coast National Park. A new site to serve South East Pembrokeshire is required and this could be located either within or outside the National Park. The Council has identified a potential site for the new facility within the National Park and intends to submit a planning application to the National Park Authority in the near future. If the application is unsuccessful, the search for a site will continue. If such a site is found in the Council’s planning area, any related planning application would be considered through policy GN.40 (waste minimisation, re-use, recovery, composting and treatment), any other relevant LDP policies and national and regional guidance.”</p>
MAC109	GN.39/ 6.163	<p><i>Amend paragraph 6.163 to read:</i></p> <p>“In accordance with the Regional Waste Plan a choice of locations and sites for new in-building facilities for</p>

Change No.	Policy or Para No	Proposed Change
		<p>handling and treatment of waste and for new open-air waste handling and treatment facilities is provided. These facilities will normally be provided on appropriate B2 employment sites and major industrial sites, some of which are brown field and/or related to ports. The B2 sites listed in this policy have been identified in accordance with the approach set out in the Regional Waste Plan, paragraph 10.2.2. The sites listed as having potential to accept new in-building facilities for handling and treatment of waste will contribute to the provision of waste management facilities rather than being given over entirely to such uses. The intention of listing them in the policy is to direct development interest to potentially appropriate sites."</p>
MAC110	GN.40	<p><i>Amend policy to read:</i></p> <p>"Proposals for the development of waste minimisation, re-use, recovery, composting and treatment facilities, including waste transfer stations and 'energy from waste' facilities, will be permitted where:</p> <ol style="list-style-type: none"> 1. The site is located at an existing waste management site or at a unit/on a site allocated or protected for B2 uses or at sites with other potential synergies if appropriate, at the type of site otherwise indicated by Welsh Government Technical Advice Note 21 (TAN 21) Waste, paragraph C36: or 2. The site can be readily accessed from A or B class roads where transport by road is the only available option; and <p>In all cases;</p> <ol style="list-style-type: none"> 3. There is an identified national, regional or local need for the facility; 4. All waste arisings from the new facility have been considered and mitigated; and 5. The co-location of the new facilities with potential energy users has been considered and incorporated where possible. <p>In addition, for the development of specialist facilities to process or dispose of hazardous waste:</p> <ol style="list-style-type: none"> 6. It must be demonstrated that no significant adverse impacts will be caused to the health and safety of the public, the economy or the environment."
MAC111	GN.40/ 6.172	<p><i>Delete paragraph 6.172:</i></p> <p>"The main concerns regarding facilities to treat such wastes are public health, safety, environmental impact</p>

Change No.	Policy or Para No	Proposed Change
		and possible detriment to the local economy. An Environmental Permit will also be required*. Footnote: *by the Environment Agency Wales."
<i>Chapter 7: Achieving the Vision: Implementation & Monitoring</i>		
MAC 112A	7.9	<p><i>Amend paragraph 7.9 to read:</i></p> <p>"More stringent requirements for infrastructure and public sector restraint on investment in the provision of new infrastructure and buildings may impact on progress during the early years of the plan. However, funding sources such as the Convergence Programme may provide resources to enable delivery of proposals, particularly those relating to economic development"</p>
MAC 112B	7.18	<p><i>Amend paragraph 7.18 to read:</i></p> <p>The key monitoring outcomes shown in figure 2 of this plan indicate those elements of the plan that will attract most attention during annual monitoring. In summary, these are to:</p> <ul style="list-style-type: none"> • Ensure that development takes place in accord with the strategy of the LDP (outcome 1); • Ensure that no additional flood risk arises from development (outcome 2); • Ensure that development is delivered in line with the settlement hierarchy. (outcome 3); • — Achieve high standards of resource and energy efficiency with all new dwellings meeting the standards sets out in national policy (outcome 4); • Provide and secure take-up of new employment land for port and energy/ renewable energy related sectors (outcome 54); • — Protect safeguarded transport routes from inappropriate development (outcome 6); • Monitor levels of new infrastructure provided over the course of the Plan and progress with the prioritisation/funding and development of key strategic transport schemes and improved ICT connectivity (outcome 75); • Ensure that town and local centre vibrancy and diversity are maintained and that Haverfordwest’s role as a sub-regional centre is strengthened (outcome 86); • Provide a range of holiday accommodation and attractions are available to meet the different needs of

Change No.	Policy or Para No	Proposed Change
		<p>visitors (outcome 97);</p> <ul style="list-style-type: none"> • Ensure new employment and mixed use sites for live/work units are provided in both urban and rural areas and existing sites are safeguarded (outcome 108); • Ensure a range of employment opportunities exist in urban and rural areas (outcome 119); • Ensure that development which would undermine the safeguarded minerals resource is not permitted (outcome 1210); • Ensure that 5,724 new dwellings are provided to deliver 4,274 market dwellings and 1,450 affordable dwellings (outcome 1311); • Ensure development is sensitive to the needs of language sensitive communities in scale and nature (outcome 1412); • Protect existing community facilities and enhance provision (outcome 1513); • Maintain landscape quality, diversity and distinctiveness (outcome 1614); • Ensure development does not compromise the favourable conservation status of species and habitats of European significance (outcome 1715); • Provide waste facilities to meet the County’s requirements (outcome 1816); • Ensure a flourishing historic and built environment (outcome 1917); • Achieve high quality sustainable design (outcome 2018).

Change No.	Policy or Para No	Proposed Change
<i>Glossary of Terms</i>		
MAC114	N/A	<p><i>Amend ‘Habitats Regulations Appraisal (HRA)’ definition to read:</i></p> <p>“HRA is required under the European Directive 92/43/EEC and is the assessment of the impacts of implementing a plan or policy project on a Natura 2000 Site. Its purpose is to consider the impacts of a land use plan against conservation objectives of the site and to ascertain whether it would adversely affect the integrity of the site. Where significant negative effects are identified, alternative options should be examined to avoid any potential damaging effects. Appropriate Assessment (AA) is one part of the HRA process. It is only required where the plan-making body determines that the plan is likely to have a significant effect on European Designated sites, either alone or in combination with other plans or projects. It considers whether the impacts of a plan or project are assessed against the conservation objectives of a European Site, in order to identify whether there are likely to be any adverse effects on site integrity and site features.”</p>
MAC115	N/A	<p><i>New Glossary definition to read:</i></p> <p>“Outcrop - The surface expression of a mineral resource.”</p>
MAC116	N/A	<p><i>Amend ‘Well-related’ definition to read:</i></p> <p>“A site than can be physically, functionally and visually linked to a settlement Well-related means well related to the built form of a settlement in terms of proximity, physical connectivity and visual relationship.”</p>
<i>Appendices</i>		
MAC117	N/A	<p>Amend Appendix 3 Table 2: Housing Supply to reflect re-assessment of anticipated delivery of new residential units in Local Villages and Countryside.</p> <p>See Annex 2.</p>
MAC118	N/A	<p><i>Create new Appendix 4:</i></p> <p>“Affordable Housing Provision.</p> <p>The estimated and approximate number of affordable homes to be secured from each source of</p>

Change No.	Policy or Para No	Proposed Change	
		delivery is:	
		A	Planning Obligations
		i	From Allocations ⁵⁴ , including 20% reduction to factor non-development of sites with permission 435
		ii	From Windfall Sites ⁵⁵ 41
			Total 476
		B	Registered Social Landlords (RSLs) ⁵⁶
		i	Pembrokeshire Housing 400
		ii	Tai Cantref 269
		iii	40% reduction to eliminate double counting of allocated sites that RSLs will develop (estimate) -268
			Total 401
		C	Other sources
		i	Exception Sites (delivered by sources other than RSLs) 10
		ii	Self-build affordable housing 20
		iii	Rural Enterprise dwellings 75

⁵⁴ To include on-site affordable dwellings and off-site commuted sum contributions

⁵⁵ Ibid

⁵⁶ Figures in rows B.i and B.ii are projected and estimated total delivery to 2021 according to RSLs’ business plans and estimates, provided to the Authority in July 2012. Figures include all dwellings, including on allocated sites, windfall sites and exception sites. Row B.iii is an authority-estimate of the number of dwellings the RSLs will develop on allocated sites, which are already counted in row A.i

Change No.	Policy or Para No	Proposed Change	
		Total	105
		D	NET TOTAL (A+B+C)
			982 (rounded to 980)
MAC119	N/A	<i>Amend Appendix 5 (previously Appendix 4)</i> <i>See Annex 3.</i>	
<i>Maps</i>			
MAC120	SP 2	<i>Inset Map 2 Milford Haven - Amend boundary of SP2.</i> <i>See Annex 4a.</i>	
MAC121	N/A	<i>Inset Map 5 Neyland - Retain Recreational Open Space Designation at land north of the Rugby Football Field in Neyland.</i> <i>See Annex 4b.</i>	
MAC122	N/A	<i>Inset Map 6 Fishguard - Modify Amenity Open Space designation to exclude gardens to the rear of Glen Side and Nos 1 and 2 Slade Cottages.</i> <i>See Annex 4c.</i>	
MAC48	GN.5	<i>Inset Map 8 Narberth - Amend Proposals Map to identify an Employment allocation at Rushacre Enterprise Park</i> <i>See Annex 4d.</i>	
MAC123	N/A	<i>Inset Map 11 Kilgetty - Modify Deposit Plan Kilgetty Kingsmoor Common Recreational Open Space designation to exclude land allocated for retail use.</i> <i>See Annex 4e.</i>	
MAC124	N/A	<i>Proposals Map 31 Blackbridge - The Council is currently developing the road proposal through the WELTAG process. A report on the outcome of WELTAG stage 2 was presented to the PCC Cabinet on 2nd July 2012, with a decision to adopt Option 1b of the proposals for the Waterston Bypass and Option 2b for the</i>	

Change No.	Policy or Para No	Proposed Change
		<p><i>Blackbridge Access route. The lines for these routes vary from those currently proposed under GN.38 (as modified through 160/FC). A matters arising change is therefore proposed, presenting the agreed routes for each.</i></p> <p><i>See Annex 4f.</i></p>
MAC125	N/A	<p><i>Inset Map 52 St Florence - Modify Amenity Open Space designation in line with planning permission 06/1609/PA.</i></p> <p><i>See Annex 4g.</i></p>
MAC126	SP6 & GN.2 3	<p><i>All Proposals Map sheets & Inset Maps - The safeguarding of the mineral resource of the plan area has been undertaken in accordance with Welsh Government policy. The extent of the safeguarded area is not being amended. However, for each affected Proposals Map sheet and Inset Map, the safeguarding information will be refined so that it distinguishes between sand and gravel, hard rock and coal resources.</i></p> <p><i>Policy SP 6 records that an Area of Search is identified for future sand and gravel working, which coincides with the safeguarded sand and gravel resource area. The refinement of safeguarding areas shown on affected Proposals Map sheets and Inset Maps will result in this Area of Search being defined spatially by the Plan.</i></p> <p><i>This clarification to the Proposals Map sheets and Inset Maps will be presented spatially in the final version of the Plan.</i></p>
MAC127	GN.39	<p><i>Inset Map 1 Haverfordwest, Inset Map 2 Milford Haven & Inset Map 3 Pembroke Dock - Policy GN.39 allocates sites for the provision of new waste management facilities. The schedule of sites in the policy text is correct, but amendments are required to three Inset Maps to ensure that sites listed in GN.39 are presented spatially and in a consistent manner. The changes required are:</i></p> <ul style="list-style-type: none"> <i>• Inset Map 1 (Haverfordwest) – insert black font diamond within circle symbols at Withybush East of Business Park, Withybush North of Business Park and Merlins Bridge Creamery Extension sites.</i> <i>• Inset Map 2 (Milford Haven) – show the diamond within circle symbol at Thornton Industrial Estate at a larger size and in black font.</i>

Change No.	Policy or Para No	Proposed Change
		<ul style="list-style-type: none"> <i>Inset Map 3 (Pembroke Dock) – show the diamond within circle symbols at Kingswood and Waterloo in black font.</i> <p><i>The clarification to the specified Inset Maps will be presented spatially in the final version of the Plan.</i></p>
MAC128	N/A	<i>Inset Map 51 St Dogmaels - Retain Recreational Open Space designation at St Dogmaels School Playing Field. See Annex 4h</i>
MAC129	Key	<p><i>Key to Proposal & Inset Maps</i></p> <p>Safeguarded Mineral Resource (Policy GN-26 SP 6 and GN.23)</p>

Annex 1 Amended Policy GN.28 Residential Allocations (MAC91)

The following sites are allocated for residential development.

Housing Allocations	Site Reference	Minimum number of Units	Site Area (Ha)	Indicative Affordable Housing requirement
Hub Towns				
Haverfordwest - Hermitage Farm	HSG/040/00269	38	1.26	25%
Haverfordwest - Slade Lane North	HSG/040/00273	48 (459 *)	15.31	25%
Haverfordwest - Slade Lane South	HSG/040/00274	512	17.05	25%
Haverfordwest – between Shoals Hook Lane and bypass	HSG/040/00275	150 277	9.26	25%
Haverfordwest - Scarrowscant / Glenover	HSG/040/00106	140	4.73	25%
Milford Haven - Steynton Thornton Road	HSG/086/00223	224	7.49	Up to 5%
Milford Haven - Steynton Beaoning Field	HSG/086/00129	149	4.54	Up to 5%
Milford Haven - Hubberston West of Silverstream	HSG/086/00095	50	1.66	Up to 5%
Milford Haven - South West of The Meads	HSG/086/00222	93	3.09	Up to 5%
Milford Haven - Castle Pill	HSG/086/00318	72	3.05	Up to 5%
Milford Haven - Hubberston Adjacent to Kings Function Centre, Dale Rd	HSG/086/00117 HSG/086/00225	151	5.16	Up to 5%

Neyland - East of Poppy Drive	HSG/093/00066	101	3.37	10%
Pembroke Dock - North of Pembroke Road	HSG/096/00238	98	2.81	Up to 5%
Pembroke Dock - North of Imble Lane	HSG/096/00231	96	2.75	Up to 5%
Pembroke Dock - East of Hill Farm, Imble Lane	HSG/096/00233	63	1.79	Up to 5%
Pembroke - North & West of Railway Tunnel	HSG/095/00154	150	5.68	10%
Pembroke - Adjacent to Monkton Swifts	HSG/095/00153	118	3.7	10%
Pembroke - Adjacent to Long Mains & Monkton Priory	HSG/095/00147	115	7.57	10%
Pembroke - North of Gibbas Way	HSG/095/00144	70	2.85	10%
Pembroke - South of Gibbas Way	HSG/095/00144	58	2.33	10%
Fishguard - Maesgwynne Farm	HSG/034/00215	399	13.24	10%
Fishguard -East of Maesgwynne	HSG/034/00165	24	0.81	10%
Fishguard - Old Infants School	HSG/034/LDP/01	21	0.7	10%
Hub Towns Total		2,940 3067	119.81	
Hub Towns Total as percentage of Total allocations		69%	64%	
Rural Town				
Narberth - West of Bloomfield	HSG/088/00078	89	3.58	25%

Gardens				
Narberth - West of Rushacre	HSG/088/00077	58	2.4	25%
Rural Town Total		147	5.98	
Rural Town Total as percentage of Total allocations		3%	3%	
Service Centre				
Johnston - Adjacent to Milford Road	HSG/048/00038	130	5.21	10%
Letterston - Court Meadow	HSG/053/00009	90	2.28	Up to 5%
Crymych - Between the School & Station Road	HSG/030/00043	60	2.07	Up to 5%
Crymych - East of Waunaeron	HSG/030/LDP/01	35	1.24	Up to 5%
Kilgetty - Extension to James Park & Cotswold Gardens	HSG/050/00042	75	3.03	20%
Kilgetty - Land to the Rear of Newton Hall	HSG/050/00043	26	1.33	20%
Kilgetty - Land West of Stepside School	HSG/050/00041	19	0.61	20%
Kilgetty - Land to the South of Kivelgy Park	HSG/050/00044	20	0.8	20%
Service Centre Total		455	16.57	
Service Centre Total as percentage of Total allocations		10%	9%	
Service Villages				
Begelly - North of New Road	HSG/003/00024	65	3	10%
Blaenffos - Adjacent to Hafod	HSG/006/00003	10	0.93	Up to 5%

Boncath - North of Cilfan y Coed	HSG/007/LDP/01	10	0.69	Up to 5%
Broadmoor - Northwest of Lyndhurst Avenue	HSG/008/LDP/01	12	0.48	10%
Cilgerran - Adjacent to Holly Lodge	HSG/020/00062	24	1.1	Up to 5%
Clarbeston Road - West of Ash Grove	HSG/022/00012	21	0.83	15%
Clunderwen - Depot Site	HSG/152/LDP/01	28	0.96	Up to 5%
Cosheston - South of Tinkers Fold	HSG/025/00028	6	0.64	10%
Croesgoch - OS 7445, North of the Forge	HSG/028/00012	20	0.67	Up to 5%
Croesgoch - East of the Forge	HSG/028/00013	22	0.73	Up to 5%
Crundale - Opposite Woodholm Close	HSG/029/00014	13	0.51	25%
Crundale - Land at Cardigan Slade	HSG/029/00017	55	2.22	25%
Eglwysrwrw - South West of the School	HSG/033/00035	15	0.51	Up to 5%
Hayscastle Cross -Land Opposite Barrowgate	HSG/041/LDP/01	6	0.43	10%
Hook - Rear of Pill Road	HSG/044/00050	15	0.59	10%
Houghton - Nursery	HSG/045/00008	15	2.18	10%
Hundleton - East of Bentlass Road	HSG/046/00015	31	1.26	Up to 5%
Jeffreyston - Rear of Beggars Roost & Sunny Side	HSG/047/LDP/01	18	0.9	25%
Lamphey - South of Cleggars	HSG/052/00011	55	2.42	10%

Park				
Llandissillio - Pwll Quarry Cross	HSG/060/LDP/01	25	1.75	10%
Llanddewi Velfrey - North of the Village Hall	HSG/057/LDP/01	12	0.5	10%
Llangwm - Opposite The Kilns	HSG/063/00024	25 (75*)	3.01	15%
Maenclochog - North West of the Globe Inn	HSG/081/LDP/01	30 (58*)	2.31	Up to 5%
Martletwy - West of Post Office Farm	HSG/083/LDP/01	6	0.4	10%
Mathry - South of the Woodturner's	HSG/085/LDP/01	6	0.2	Up to 5%
Penally - North of The Paddock	HSG/097/LDP/01	8	0.29	25%
Penally - Penally Heights	HSG/097/LDP/02	11	0.56	25%
Pentlepoir - Land adjacent to Coppins Lodge	HSG/099/LDP/01	35	1.68	25%
Puncheston - Opposite Bro Dewi	HSG/108/LDP/01	6	0.39	Up to 5%
Puncheston - West of Awelfa	HSG/108/LDP/02	12	0.44	Up to 5%
Robeston Wathen - South of Robeston Court	HSG/113/LDP/01	14	0.63	25%
Roch - East of Pilgrim's Way	HSG/114/LDP/01	44	2.19	20%
Rosemarket - Opposite The Glades	HSG/116/LDP/01	13	0.5	15%
Sageston - South of the Plough Inn	HSG/015/00022	31	1.27	Up to 5%
Simpson Cross - East of Hill Lane	HSG/119/LDP/01	14	0.72	20%

Spittal - North West of Wesley Way	HSG/120/00018	22	0.87	15%
St Dogmaels - Awel y Mor Extension	HSG/122/00035	16	0.55	Up to 5%
St. Florence - North of Parsons Green	HSG/123/LDP/01	26	1.17	25%
Templeton - South of the B4315	HSG/132/00030	18	1.21	15%
Templeton - South of the Boars Head Junction	HSG/132/LDP/01	28	1.13	15%
Tiers Cross - North of Bulford Road	HSG/135/00004	23	0.91	Up to 5%
Wolfscastle – opposite Haul y fryn	HSG/149/LDP/01	30	1.2	15%
Service Villages Total		896	44.93	
Service Villages Total as percentage of Total allocations		20%	24%	
All Housing Allocations total		4,438 4565	187.29	

**Annex 2 – Submitted Appendix 3 to the Plan
Table 2 Housing Land Supply (MAC 117)**

Ref	Projected Housing Supply 2011–2021 with Focussed Changes			Urban total	urban %	Rural total	rural %
A	Existing Full and Reserved Matters permissions @ 10th March 2010	2539	1406	55.4		1133	44.6
B	Total units on LDP allocations	4927	3351	68.0		1576	32.0
C	Units on LDP allocations without full/RM permission	4357	2781	63.8		1576	36.2
D	Less units on LDP allocations that will not be delivered during the plan period	489	411	84.0		78	16.0
E	Plus units deleted as LDP allocations because building has commenced	102	102	100.0		0	0.0
F	Net allocated units 2011–2021 (C–D+E)	3970	2370	59.7		1498	37.7
G	Windfall capacity	1030	514	49.9		516	50.1
H	Projected windfall capacity (40%) of capacity	412	205.6	49.9		206.4	50.1
I	Projected number of Local Village units	200	0	0.0		200	100.0
J	Projected number of new countryside units plus rural conversions	400	0	0.0		400	100.0
K	Total Housing Supply and Urban/Rural split (A+F+H+I+J)	7521	3981.6	52.9		3437.4	45.7

Annex 2 – Revised Appendix 3 to the Plan
Table 2 Housing Land Supply (MAC 117)

Ref	Projected Housing Supply 2011-2021	Urban total	Urban %	Rural total	Rural %	
Ai	Housing Commitments (Permissions @ 10th March 2010)	3944	1983	50.3	1961	49.7
Aii	Expected contribution from housing commitments	2760	1388	50.3	1372	49.7
B	Permissions on allocated sites	701	546	77.9	155	22.1
C	Permitted dwellings not on allocated sites (Aii-B)	2059	842	40.9	1217	59.1
D	Dwellings on LDP allocations	4565	3067	67.2	1498	32.8
E	Dwellings on allocated sites with anticipated delivery beyond plan period	489	411	84.0	78	16.0
F	Dwellings commenced on former Deposit Allocations	102	102	100.0	0	0.0
G	Potential Windfall capacity	1030	514	49.9	516	50.1
H	Windfall dwellings at 40% capacity (Row G)	412	205.6	49.9	206.4	50.1
I	Dwellings in Local Villages	50	0	0.0	50	100.0
J	Dwellings in the Countryside	150	0	0.0	150	100.0
K	Total Housing Supply (C+D+F+H+I+J)	7338	4217	57.5	3121.4	42.5

Annex 3 Submitted Monitoring Framework (MAC 119)

Strategic Objective	Key Monitoring Outcomes	Policies to Achieve This	Indicators	Policy targets and triggers for further investigation	Implementation by
<p>Mitigating and responding to the challenge of climate change</p>	<p>1. Development takes place in accord with the strategy of the LDP.</p> <p>2. No significant additional flood risks arising from development.</p>	<p>SP1, GN3, GN4</p>	<p>1. Number of major development applications approved contrary to policy GN4.</p> <p>2. Number of planning obligations agreed against number of relevant permissions granted.</p> <p>3. Number of planning permissions granted contrary to policy GN3.</p> <p>4. Amount of development (by TAN15 paragraph 5.1 development category) permitted in C1 and C2 floodplain areas and otherwise not meeting</p>	<p>1. 0% – narrative on any deviation.</p> <p>2. 100% – narrative on any deviation.</p> <p>3. 0% – narrative on any deviation.</p> <p>4. Running total.</p>	<p>Private sector Public sector PCC</p>

Strategic Objective	Key Monitoring Outcomes	Policies to Achieve This	Indicators	Policy targets and triggers for further investigation	Implementation by
<p>all the TAN15 tests (paragraph 6.21 – v).*</p>					
<p><i>Sources of information and frequency of update:</i></p> <ul style="list-style-type: none"> • Swift – monitoring of planning applications – ongoing. • Annual County Council monitoring of planning obligations. 					
<p>Improving access to goods and services</p>	<p>3. Development is delivered in line with the settlement hierarchy.</p> <p>4. Development achieving high standards of resource and energy efficiency with all new dwellings meeting the standards set out in national policy.</p>	<p>SP3, SP4, SP10, SP12, GN33</p>	<p>1. Amount of development permitted on allocated sites as percentage of Plan allocations and as a percentage of total development permitted.</p> <p>2. Area of land safeguarded for transport proposals lost to development.</p> <p>3. Net change as a result of planning permission given for</p>	<p>1. 100% completion of allocated sites by 2021. At least one third of the allocations should be permitted by 2015. To ensure accordance with the strategy the percentage of development on allocated sites should be at least 80%.</p> <p>2. 0% – narrative on any deviation.</p> <p>3. Positive change.</p>	<p>Private sector Public sector PCC</p>

Strategic Objective	Key Monitoring Outcomes	Policies to Achieve This	Indicators	Policy targets and triggers for further investigation	Implementation by
			<p>community facilities (area and type)</p> <p>4.— Take-up of safeguarded routes and sites allocated for community facilities matched against expected timescales for development.</p> <p>5.— Number of applications approved contrary to Policy GN33.</p>	<p>4.— Meet expected timescales – narrative on any deviation.</p> <p>5.— 0 unless justified by policy framework.</p>	
<p><i>Sources of information and frequency of update:</i></p> <ul style="list-style-type: none"> •— Swift – monitoring of planning applications – ongoing. 					
<p>Building on the County’s strategic location for energy and port-related development</p>	<p>5.— Availability and take-up of employment land is secured for port and energy/renewable energy related sectors.</p>	<p>SP2</p>	<p>1.— Number of applications and area granted permission within designated areas that comply with Policy SP2.</p> <p>2.— Planning</p>	<p>1.— Running total.</p>	<p>Private sector</p> <p>Public sector</p> <p>PCC</p> <p>Milford Haven Port Authority</p>

Strategic Objective	Key Monitoring Outcomes	Policies to Achieve This	Indicators	Policy targets and triggers for further investigation	Implementation by
	6. Levels of new infrastructure provided over the course of the Plan and progress with the prioritisation/funding and development of key strategic transport schemes and improved ICT connectivity.		permission granted for employment development on allocated sites within identified port areas (Blackbridge, Milford Haven, Goodwick former Dewhurst factory site and Goodwick Parrog). 3. Number of planning obligations completed. 4. Number of applications permitted contrary to Policy GN3 and/or appeals upheld.	2. 100% by end of Plan period. Narrative to update on plans or projects emerging. 3. No specified target – rolling total. 4. 0 – narrative on any deviation.	
<p><i>Sources of information and frequency of update:</i></p> <ul style="list-style-type: none"> Annual employment land surveys Swift – monitoring of planning applications – ongoing. 					
Supporting the development of the distinctive	8. Pembrokeshire’s town and local centres are vibrant	SP4, SP5, SP12,	1. Number of applications approved contrary to policies SP4,	1. Should be 0	Private sector Public sector

Strategic Objective	Key Monitoring Outcomes	Policies to Achieve This	Indicators	Policy targets and triggers for further investigation	Implementation by
<p>role of Pembrokeshire’s towns, especially within the Haven Hub</p> <p>And</p> <p>Regenerating town centres and Sustaining and enhancing the rural and urban economy.</p>	<p>and diverse. Haverfordwest’s role as a sub-regional centre is strengthened.</p>	<p>SP14</p>	<p>SP14, GN1 (criterion 1), GN12, GN13, (or appeals upheld where these policies are reason for refusal) (enhance the environment and benefit local communities).</p> <p>2.— Amount of major retail, office and leisure development (sqm) permitted in town centres expressed as a percentage of all major development permitted. (TAN4)*</p> <p>3.— Proportion of allocations in each Centre developed as a percentage of whole.</p> <p>4.— Scale of use classes A1, A2 and A3 unit numbers and</p>	<p>2.— No specified target – rolling total.</p> <p>3.— 100% by end of Plan</p>	<p>PCC</p>

Strategic Objective	Key Monitoring Outcomes	Policies to Achieve This	Indicators	Policy targets and triggers for further investigation	Implementation by
			<p>floorspace within each of the town centre areas.</p> <p>5.— Number of ground floor vacant units in each of the Town Centres and percentage of vacant units in comparison with all units.</p> <p>6.— Percentage of vacant floorspace within primary and secondary frontages in each of the Town Centres.</p>	<p>period. 33% by March 2016.</p> <p>4.— In proportion to the hierarchy/role.</p> <p>5.— <10%</p> <p>6.— None should be significantly higher than others.</p>	
<p><i>Sources of information and frequency of update:</i></p>					

Strategic Objective	Key Monitoring Outcomes	Policies to Achieve This	Indicators	Policy targets and triggers for further investigation	Implementation by
<ul style="list-style-type: none"> • Annual retail surveys • Swift – monitoring of planning applications – ongoing • Annual employment land surveys. 					
<p>Developing quality visitor economy founded on a distinct sense of place and an outstanding natural and built environment.</p>	<p>9. A range of holiday accommodation and attractions are available to meet the different needs of visitors.</p>	<p>SP5</p>	<p>1. Percentage of applications approved contrary to policies SP5, GN16 and GN17, GN18 and GN19 (or appeals upheld where these policies are reason for refusal) (locational requirements)</p> <p>2. Percentage of visitor economy applications approved contrary to policy GN1 (or appeals upheld where this policy is reason for refusal)</p>	<p>1. Less than 10% of total applications approved, with narrative to explain any deviation.</p> <p>2. Less than 10% with narrative to explain any deviation.</p>	<p>Private sector Public sector PCC</p>
<p><i>Sources of information and frequency of update:</i></p> <ul style="list-style-type: none"> • Swift – monitoring of planning applications – ongoing. 					
<p>Sustaining and enhancing the rural and urban economy</p>	<p>10. New employment and mixed use sites for live/work units are provided in both</p>	<p>SP1, SP2, SP3, SP5,</p>	<p>1. Net employment land supply/development (hectares/ sqm)</p>	<p>1. No target – running total.</p>	<p>Private sector Public sector PCC</p>

Strategic Objective	Key Monitoring Outcomes	Policies to Achieve This	Indicators	Policy targets and triggers for further investigation	Implementation by
	<p>urban and rural areas and existing sites are safeguarded.</p> <p>11. A range of employment opportunities exist in urban and rural areas.</p> <p>Development which would undermine the safeguarded minerals resource is not permitted.</p>	<p>SP6, SP7, SP15, SP16</p>	<p>2.— Rate of development of allocated sites— by type of development and settlement hierarchy</p> <p>3.— Amount of development of allocated sites as percentage of all development over monitoring period by settlement hierarchy.</p> <p>4.— Running comparison of rate of development of strategic/non strategic allocated sites.</p> <p>5.— The extent of primary land won aggregates permitted in accordance with the</p>	<p>2.— 100% by end of Plan period. 33% by March 2016. In proportion with hierarchy.</p> <p>3.— >75%— with narrative to explain any deviation.</p> <p>4.— Narrative.</p>	<p>Minerals Operators</p>

Strategic Objective	Key Monitoring Outcomes	Policies to Achieve This	Indicators	Policy targets and triggers for further investigation	Implementation by
			<p>Regional Technical Statement for Aggregates expressed as a percentage of the total capacity required as identified in the Regional Technical Statement (MTAN).</p> <p>6.— Number and percentage of appeals dismissed based on the County Council’s reason being safeguarding of the minerals resource.</p>	<p>5.— Maintenance of the hard rock and sand and gravel landbanks for the duration of the Plan (to 2021) and for 10 years (hard rock) and 7 years (sand and gravel) beyond the Plan period and commencement of partial review if land bank drops to 12 years (hard rock) or 9 years (sand and gravel).</p> <p>6.— 100% — further investigation if less than 85% in two consecutive years.</p>	
<p><i>Sources of information and frequency of update:</i></p> <ul style="list-style-type: none"> ● Annual employment land surveys ● Swift — monitoring of planning applications — ongoing. ● Minerals landbank monitoring by the Regional Minerals Group (annual with an enhanced survey every 4 years) 					
Developing vibrant	13. An estimated 5600 new dwellings	SP3, SP4,	1.— Housing land supply (TAN1)	1.— Minimum 5 years housing land supply.	

Strategic Objective	Key Monitoring Outcomes	Policies to Achieve This	Indicators	Policy targets and triggers for further investigation	Implementation by
<p>communities providing a range and mix of homes and local services</p> <p>(See also indicators for Sustaining and enhancing the rural and urban economy)</p>	<p>are provided of which a minimum of 1450 new affordable homes are provided.</p> <p>14. Development is sensitive to the needs of language-sensitive communities in scale and nature.</p> <p>15. Existing community facilities are protected and provision enhanced.</p>	<p>SP5, SP7, SP8, SP9, SP15, GN31, GN32, GN33, GN34, GN35</p>	<p>2.— Annual dwelling completions and commitments.</p> <p>3.— Amount of housing development (dwellings hectares, type and settlement hierarchy) permitted and built on allocated housing sites as a percentage of the total housing allocation and as a percentage of the total housing development permitted.</p> <p>4.— Number and percentage of appeals upheld where the County Council’s refusal reasons based on the requirements of the settlement hierarchy are not met by the proposal.</p>	<p>2.— Average of 560 new dwellings per year.</p> <p>3.— 100% of allocations should be completed by 2021. One third of applications should be permitted by March 2016. As a total of all housing development permitted, a minimum of 80% should be on allocated sites.</p> <p>4.— 100% further investigation required if less than 85% in 2 consecutive years.</p>	

Strategic Objective	Key Monitoring Outcomes	Policies to Achieve This	Indicators	Policy targets and triggers for further investigation	Implementation by
			<p>5.— The number of net additional affordable and general market dwellings built (TAN2).</p> <p>6.— Average density of housing permitted on allocated sites.</p> <p>7.— Affordable housing completions and commitments.</p>	<p>5.— Running total.</p> <p>6.— Average density of newly constructed housing development across the Plan area to equal or exceed 30 dwellings per hectare — further investigation if average density is less than 25 dwellings per hectare in 2 consecutive years.</p> <p>7.— Running total.</p>	

Strategic Objective	Key Monitoring Outcomes	Policies to Achieve This	Indicators	Policy targets and triggers for further investigation	Implementation by
			<p>8.— Number of affordable dwellings with planning permission and number built as a percentage of all new housing with planning permission and built.</p> <p>9.— Number of applications where Policy SP9 is – reason for approval/refusal; Number of applications approved contrary to this policy; and number of appeals against this policy upheld.</p>	<p>8.— 145 affordable dwellings per annum consented – further investigation if less than 123 affordable dwellings completed per annum for 2 consecutive years (85% of the target) and affordable housing representing 26% of all new housing built – further investigation if this falls below 20%.</p> <p>9.— Reason for approval/refusal – running total. Contrary to policy – 0 with narrative on any deviation. Appeals less than 1%.</p>	

Strategic Objective	Key Monitoring Outcomes	Policies to Achieve This	Indicators	Policy targets and triggers for further investigation	Implementation by
			<p>10.— Number of permissions granted in relevant, identified communities with condition requiring phasing for Welsh language reason.</p> <p>11.— Number of sites and pitches permitted and completed for gypsies and travellers accommodation.</p> <p>12.— Progress towards take up of allocated sites for gypsies and travellers accommodation.</p>	<p>10.— Running total.</p> <p>11.— Running total.</p> <p>12.— 100% by end March 2016. Commence the necessary deregistration process at the Kilgetty (Kingsmoor Common) site within 2 years of Plan adoption, with further investigation if this does not happen.</p>	

Strategic Objective	Key Monitoring Outcomes	Policies to Achieve This	Indicators	Policy targets and triggers for further investigation	Implementation by
			<p>13.— Net change of community facilities. (By area and type)</p> <p>14.— Take-up of sites allocated for community facilities against expected timescales for development.</p> <p>15.— Number of applications approved contrary to policy GN33.</p> <p>16.— Net change in recreational open space created (in hectares).</p>	<p>9.— Positive change.</p> <p>13.— See individual targets.</p> <p>14.— 0 — narrative to explain any deviation.</p> <p>15.— 0 or net increase, unless justified by policy framework.</p>	
<p><i>Sources of information and frequency of update:</i></p>					

Strategic Objective	Key Monitoring Outcomes	Policies to Achieve This	Indicators	Policy targets and triggers for further investigation	Implementation by
<ul style="list-style-type: none"> • Annual joint housing land availability studies (JHLAS) • Swift – monitoring of planning applications – ongoing. • Annual County Council monitoring of new community facilities. 					
<p>Delivering design excellence and environmental quality.</p> <p>And</p> <p>Protecting and enhancing the natural and built environment</p>	<p>16. Landscape quality, diversity and distinctiveness are maintained.</p> <p>17. Development does not compromise the favourable conservation status of species and habitats of European significance.</p> <p>18. Waste facilities to meet the County’s requirements.</p> <p>19. A flourishing historic and built environment.</p>	<p>GN2, GN3</p> <p>SP1, SP13, SP16, GN3, GN4, GN36, GN37</p>	<p>1. Number of planning permissions granted contrary to policy GN1, criterion 3.</p> <p>2. Number of housing permissions within Settlement Boundaries as a percentage of all housing permissions. (Disaggregated Assembly Indicator).</p> <p>3. Number of permissions approved contrary to policy SP16.</p> <p>4. Number of affordable housing units permitted on exceptional sites.</p>	<p>1. 0 – narrative to explain any deviation.</p> <p>2. No specific target, but should respect the Plan strategy to direct majority of development to locations with existing services and facilities.</p> <p>3. 0 – narrative to explain any deviation.</p> <p>4. Running total – compare with planned provision through</p>	

Strategic Objective	Key Monitoring Outcomes	Policies to Achieve This	Indicators	Policy targets and triggers for further investigation	Implementation by
	20. High quality sustainable design.		<p>5.— Number of planning permissions on statutory or locally designated nature conservation sites.</p> <p>6.— Amount of Greenfield lost to development (ha) which is not allocated in the Plan.</p> <p>7.— Net change in Open Space as a result of development (ha) which is not allocated in the Plan.</p> <p>8.— Number planning permissions granted contrary to policy GN36.</p>	<p>allocation or land within settlements.</p> <p>5.— 0 unless justified within Policy framework.</p> <p>6.— 0 unless justified by policy.</p> <p>7.— Positive gain unless justified by policy.</p> <p>8.— 0 — narrative to explain any deviation.</p>	

Strategic Objective	Key Monitoring Outcomes	Policies to Achieve This	Indicators	Policy targets and triggers for further investigation	Implementation by
			<p>9.— Number of planning permissions granted contrary to policy GN37.</p> <p>10.— Number of applications involving Listed Buildings, SAMs approved contrary to policy GN37.</p> <p>11.— Loss/increase of Listed Buildings or SAMs as a result of development.</p> <p>12.— Area of Biodiversity Action Plan (BAP) habitat lost to new developments and area of BAP habitat created through enhancement schemes associated with new development.</p>	<p>9.— 0 — narrative to explain any deviation.</p> <p>10.— 0 — narrative to explain any deviation.</p> <p>11.— Running total with narrative.</p> <p>12.— Positive figure with narrative on types of habitats gained and lost.</p>	

Strategic Objective	Key Monitoring Outcomes	Policies to Achieve This	Indicators	Policy targets and triggers for further investigation	Implementation by
			<p>13.— Amount of new development (ha) permitted on previously developed land (brownfield, redevelopment and conversions) expressed as a percentage of all development permitted.</p> <p>14.— Amount of waste management capacity permitted expressed as a percentage of the total capacity required, as identified within the Regional Waste Plan (TAN21)</p> <p>15.— Commentary on the capacity of ‘out of plan provision’ permitted/built and secured through regional procurement</p>	<p>13.— No specific target.</p> <p>14.— 100%— further investigation if this falls</p>	

Strategic Objective	Key Monitoring Outcomes	Policies to Achieve This	Indicators	Policy targets and triggers for further investigation	Implementation by
			<p>arrangements:</p> <p>16.—The capacity (mW) of renewable energy developments permitted:</p> <p>17.—Net change to the number of building on the Buildings at Risk Register.</p>	<p>below 80% for 2 consecutive years:</p> <p>15.—No specific target.</p> <p>16.—No target but one may be set for LDP monitoring purposes, using the methodology set out in the WG’s recently published Renewable Energy Toolkit.</p>	

Strategic Objective	Key Monitoring Outcomes	Policies to Achieve This	Indicators	Policy targets and triggers for further investigation	Implementation by
				17.— No increase in the number of Buildings on the Register — narrative to inform of changes.	
<p><i>Sources of information and frequency of update:</i></p> <ul style="list-style-type: none"> ● Annual joint housing land availability studies (JHLAS) ● Regional joint procurement contracts. ● BAP reporting on the status of habitats of species (as part of the UK BAP reporting process). ● CCW monitoring of the condition of designated sites (every 4 years). ● Five yearly review of the Buildings at Risk Register. ● Swift — monitoring of planning applications — ongoing. 					

Annex 3 - Revised Monitoring Framework (MAC 119)

Appendix 5 to the Plan (previously Appendix 4)

<i>Strategic Objective</i>	<i>Key Monitoring Outcomes</i>	<i>Policies to achieve this</i>	<i>Indicators</i>	<i>Policy targets⁵⁷</i>	<i>Triggers for further investigation⁵⁸</i>	<i>Implementation by</i>
Mitigating and responding to the challenge of climate change (A)	<ol style="list-style-type: none"> Development takes place in accord with the strategy of the LDP. No significant additional flood risks arising from development. 	SP1, GN1	<p>(Core)</p> <ol style="list-style-type: none"> Amount of development (by TAN15 paragraph 5.1 development category) permitted in C1 and C2 floodplain areas and otherwise not meeting all the TAN15 tests (paragraph 6.21 – v).* 	<ol style="list-style-type: none"> Development in zones C1 and C2 is in line with the provisions of TAN 15. 	<ol style="list-style-type: none"> More than 1 approval within 1 year of development in zones C1 and C2 contrary to the provisions of TAN 15. 	Private sector EAW PCC
<p><i>Sources of information and frequency of update:</i></p> <ul style="list-style-type: none"> <i>Swift – monitoring of planning applications.</i> 						
Improving access to goods and services (I)	3. Development is delivered in line with the settlement hierarchy.	SP3 SP4 SP10 SP12 GN7 GN13 GN28	<ol style="list-style-type: none"> Number and proportion of housing planning permissions at different levels of the settlement hierarchy. 	<ol style="list-style-type: none"> 60% of permissions are in the Hub Towns. 	<ol style="list-style-type: none"> Permissions less than 50% in Hub Towns over a period of 3 years. 	Private sector Public sector PCC
			<ol style="list-style-type: none"> Area of land safeguarded for transport related 	<ol style="list-style-type: none"> 0% 	<ol style="list-style-type: none"> Any loss will require investigation 	

⁵⁷ Annual unless otherwise specified.

⁵⁸ Annual unless otherwise specified.

		GN33	proposals lost to development.			
			3. Net change in provision of community facilities as a consequence of planning permission (area and type).	3. To maintain key facilities.	3. Loss of over 3 community facilities within any 3 year period.	
			4. Level of services within rural settlements.	4. Services in settlements within the settlement hierarchy are not significantly lower than in the 2008 Rural Facilities Survey.	4. Monitor at Plan Review (2017) – a 10% change in number of settlements achieving service village level would require further investigation	
			(Core) 5. The capacity (mW) of renewable energy developments permitted.	5. No target but one may be set for LDP monitoring purposes, using the methodology set out in WG Renewable Energy Toolkit.	5. No trigger identified.	
			6. Amount of open space (m2) permitted in relation to overall number of dwellings permitted.	6. Provision of public open space at a rate of more than 25% below the standard requirement (as set out in SPG)	6. Provision of public open space at a rate of more than 35% below the standard requirement (as set out in SPG) at Plan	

						Review (2017).	
<p><i>Sources of information and frequency of update:</i></p> <ul style="list-style-type: none"> • <i>Swift – monitoring of planning applications.</i> • <i>New Rural Facilities Survey undertaken in 2017.</i> 							
<p>Building on the County’s strategic location for energy and port-related development (E)</p>	<p>4. Availability and take-up of employment land is secured for port and energy/renewable energy related sectors.</p> <p>5. Levels of new infrastructure provided over the course of the Plan and progress with the prioritisation/funding and development of key strategic transport schemes and improved ICT connectivity.</p>	<p>SP2 SP3 SP10 GN3 GN38</p>	<p>1. Planning permission granted for employment development on allocated sites within identified port areas (Blackbridge, Milford Haven, Goodwick former Dewhirst factory site and Goodwick Parrog).</p>	<p>1. 100% by end of Plan period.</p>	<p>1. 50% without planning permission at Plan Review (2017). Annual narrative to describe progress towards delivery</p>	<p>Private sector</p> <p>Public sector</p> <p>PCC</p> <p>Milford Haven</p> <p>Port Authority</p>	
			<p>2. Progress towards delivery of safeguarded transport schemes.</p>	<p>2. All delivered by 2021.</p>	<p>2. If finance not been secured for a project by Plan Review (2017).</p>		
<p><i>Sources of information and frequency of update:</i></p> <ul style="list-style-type: none"> • <i>Swift – monitoring of planning applications.</i> 							
<p>Supporting the development of the distinctive role of Pembrokeshire’s towns, especially within the Haven Hub (F)</p> <p>And</p>	<p>6. Pembrokeshire town and local centres are vibrant and diverse. Haverfordwest role as a sub-regional centre is strengthened.</p>	<p>SP4 SP5 SP12 SP14 GN12 GN13 GN14</p>	<p>1. Number of applications approved contrary to policies SP 4, SP 14, GN.12, and GN.13.</p>	<p>1. 0</p>	<p>1. More than 4 planning applications approved contrary to a single policy over 4 years.</p>	<p>Private sector</p> <p>Public sector</p> <p>PCC</p>	
			<p>(Core)</p> <p>2. Amount of major retail, office and leisure development</p>	<p>2. 100% (figure to exclude schemes which are allocated</p>	<p>2. 90% of target</p>		

<p>Regenerating town centres and Sustaining and enhancing the rural and urban economy.</p> <p>(G)</p>			(sq m) permitted in town centres expressed as a percentage of all major development permitted. (TAN4)*	sites outside town centres).	
			3. Level of floorspace of retail development permitted outside town centres other than schemes falling under Policy GN.15 Small Scale Retail or GN.10 (farm shop).	3. 0%	3. Narrative on any schemes not permitted under Policy GN.15 or GN.10.
			4. Progress towards delivery of Retail allocations.	4. 100% delivered by end of Plan period.	4. Any allocations which have not gained planning permission by Plan Review (2017).
			5. Change of presence of A1 uses (unit numbers and floorspace) in primary retail frontages.	5. At least 66% of the linear frontage is A1 use class within primary frontages.	5. Less than target.
			6. Percentage of ground floor vacant units in each Town Centre (within identified LDP boundary).	6. Vacancy levels are no higher than the national (UK) average.	6. Vacancy levels 5% higher than national (UK) average.
<p>Sources of information and frequency of update:</p> <ul style="list-style-type: none"> • Annual retail surveys • Swift – monitoring of planning applications • Annual employment land surveys. 					

<p>Developing quality visitor economy founded on a distinct sense of place and an outstanding natural and built environment</p> <p>(H)</p>	<p>7. A range of holiday accommodation and attractions are available to meet the different needs of visitors.</p>		<p>1. Number of applications approved contrary to policies SP5, GN16 and GN17, GN18 and GN19 (including at appeal).</p>	<p>1. No applications approved contrary to policies.</p>	<p>1. More than 4 approvals in 4 years.</p>	<p>Private sector Public sector PCC</p>
<p><i>Sources of information and frequency of update:</i></p> <ul style="list-style-type: none"> • <i>Swift – monitoring of planning applications.</i> • <i>Appeal decisions from the Planning Inspectorate.</i> 						
<p>Sustaining and enhancing the rural and urban economy</p> <p>(C)</p>	<p>8. New employment and mixed use sites for live/work units are provided in both urban and rural areas and existing sites are safeguarded.</p> <p>9. A range of employment opportunities exist in urban and rural areas.</p> <p>10. Development which would undermine the minerals reserve is not permitted.</p>	<p>SP2 SP3 SP5 SP6 SP7 SP15 SP16 GN24</p>	<p>(Core)</p> <p>1a. New employment land developed (hectares/sq m).</p> <p>1b. New employment land developed for offices (hectares/sq m)</p> <p>1c. New employment land developed for industry and warehousing (hectares/sq m)</p> <p>2. Area of land permitted on non-allocated sites (ha/sq m).</p> <p>3. Progress towards delivery of strategic employment sites: a) Blackbridge</p>	<p>1. 100 ha developed by 2021.</p> <p>2. 10% of total employment land permitted.</p> <p>3. 75% delivered by 2021.</p>	<p>1. Less than 45ha developed by 2017.</p> <p>2. 50% below target.</p> <p>3. Development not commenced by the following</p>	<p>Private sector Public sector PCC CNPA, other Local Planning Authorities in SW Wales, Minerals Operators</p>

			<ul style="list-style-type: none"> b) Pembrokeshire Science and Technology Park c) Withybush Business Park d) Trecwn 		<p>dates:</p> <ul style="list-style-type: none"> a) Blackbridge (2018) b) Pembrokeshire Science and Technology Park (March 2017) c) Withybush Business Park (March 2017) d) Trecwn (March 2017) 	
			<p>4. Progress towards delivery of mixed use sites:</p> <ul style="list-style-type: none"> a) Haverfordwest – Old Hakin Road b) Johnston Arnold’s Yard c) Dale Road, Hubberston 	<p>4. 66% delivered by 2021</p>	<p>4. Sites do not have planning permission by Plan Review (2017).</p>	
			<p>(Core)</p> <p>5. The extent of primary land won aggregates permitted in accordance with the Regional Technical Statement for Aggregates expressed as a percentage of the total capacity</p>	<p>5. Maintenance of the hard rock and sand and gravel landbanks for the duration of the Plan (to 2021) and for 10 years (hard rock) and 7 years (sand and gravel)</p>	<p>5. Further investigation if land bank drops to 12 years (hard rock) or 9 years (sand and gravel), to ensure sufficient provision at end of Plan</p>	

			required as identified in the Regional Technical Statement (MTAN).	beyond the Plan period.	period. Monitor tonnage permitted.	
			6. Number of applications that would reduce the mineral resource safeguarded by the Plan.	6. 0.	6. More than 4 approvals in 4 years.	
			7. Progress towards fulfilling the commitment to find alternative locations for minerals production in non-National Park locations within Pembrokeshire and / or elsewhere in SW Wales.	7. a) Regional discussions to resume by 2014 and b) Significant progress towards identification of new mineral reserves in the County and / or SW Wales region demonstrated by 2018.	7. No trigger, but narrative to update on position.	
<p><i>Sources of information and frequency of update:</i></p> <ul style="list-style-type: none"> • Annual employment land surveys • Swift – monitoring of planning applications. • Minerals landbank monitoring by the Regional Minerals Group (annual with an enhanced survey every 4 years) 						
Developing vibrant communities providing a range and mix of homes and local services (D)	11. An estimated 5700 new dwellings are provided of which a minimum of 980 new affordable homes are provided.	SP3 SP4 SP5 SP7 SP8 SP9 SP15 GN28	(Core) 1. Housing land supply (TAN 1)	1. Minimum 5 years housing land supply.	1. Supply less than 5.5 years.	
	12. Development is sensitive to the	GN29 GN31	2. Annual dwelling completions and commitments.	2. Average of 500 new completed dwellings per year over first 4 year period. Average of 640	2. 10% below target.	

(See also indicators for Sustaining and enhancing the rural and urban economy)	needs of language-sensitive communities in scale and nature.	GN32 GN33 GN34 GN35		new completed dwellings per year in remaining years.		
			(Core) 3. Amount of housing development permitted and built on allocated housing sites as a percentage of the total housing allocation and as a percentage of the total housing development permitted.	3. 80% of allocations should be completed by 2021. As a total of all housing development permitted, a minimum of 60% should be on allocated sites.	3. 30% of allocations should be permitted by March 2017. Investigation if permissions on allocated sites are below 60% of total.	
			4. Progress towards delivery on the following housing sites: a) Slade Lane South, Haverfordwest b) Slade Lane North, Haverfordwest a) Maesgwynne, Fishguard b) Shoals Hook Lane	4. All sites should deliver identified units anticipated in the Plan by 2021.	4. Development not commenced by the following dates: a) Slade Lane South, Haverfordwest 2017 b) Slade Lane North, Haverfordwest 2020 c) Maesgwynne, Fishguard – March 2017 d) Shoals Hook Lane March	

					2017.	
			5. Affordable Housing percentage target in GN.29	5. Target will reflect economic circumstances.	5. Should average house prices increase by 5% above the base price of 2012 levels sustained over 2 quarters then the Authority will consider other triggers identified in the Affordable Housing SPG and may conduct additional viability testing and modify the targets established in GN.28 and GN.29	
			(Core) 6. The number of net additional affordable and general market dwellings built (TAN2)	6. 5700 dwellings by 2021 including 980 affordable housing dwellings by 2021.	6. If total number of dwellings built by Plan Review (2017) is less than 50% of target.	
			7. a) Total number of affordable homes granted planning permission.	7. a) 980 by 2021	7. a) If less than 50% of target by Plan Review (2017).	
			7. b) Number of affordable homes gaining planning	7. b) 476 by 2021.	7. b) If less than 50% of target by Plan Review	

			permission through planning obligations.		(2017).	
			7. c) Number of affordable homes permitted as Exception sites.	7. c) 40 by 2021.	7. c) If less than 20 by Plan Review (2017).	
			7. d) Number of affordable homes permitted delivered by Registered Social Landlords.	7. d) 401 by 2021	7. d) Investigation if less than 200 by Plan Review (2017).	
			8. a) Number of rural workers dwellings granted planning permission	8. a) 40 by 2021.	8. a) 50% of target.	
			8. b) Indication of general level of Affordable Housing Need.	8. b) No significant increases annually.	8. b) Level of need varies by over 10% in comparison with 2012 level as measured by the Common Housing Register.	
			9. a) Number of affordable dwellings with planning permission and number built as a percentage of all new housing with planning permission and built.	9. a) 98 affordable dwellings per annum consented; affordable housing to be at least 15% of overall permission and completion.	9. a) Further investigation if affordable housing is less than 12.5% of overall permissions.	
			10. b) Proportion of housing	10. b) 75% of development	10. b) 10% on targets.	

			development fulfilling affordable housing contributions sought by the authority.	to meet or exceed contribution rate; 95% of development to make some form of contribution to affordable housing.		
			(Core) 11. Average density of housing permitted on allocated sites.	11. 30 dph in Hub Towns and 25 dph in Rural settlements.	11. Further investigation if less than 25dph in urban areas and less than 20dph in rural areas	
			12. Average density of housing permitted on windfall sites.	12. 30 dph in Hub Towns and 25 dph in Rural settlements.	12. Further investigation if less than 25dph in urban areas and less than 20dph in rural areas	
			13. a) Number of sites and pitches permitted and completed for gypsies and travellers accommodation	13. a) 40 additional Gypsy Traveller pitches are provided by the end of 2015.	13. a) Less than 40 permitted by the end of 2015.	
			12. b) Progress towards take up of allocated sites for gypsies and travellers accommodation.	12. b) 40 additional Gypsy Traveller pitches are provided by the end of 2015.	12. b) Less than 40 permitted by the end of 2015.	

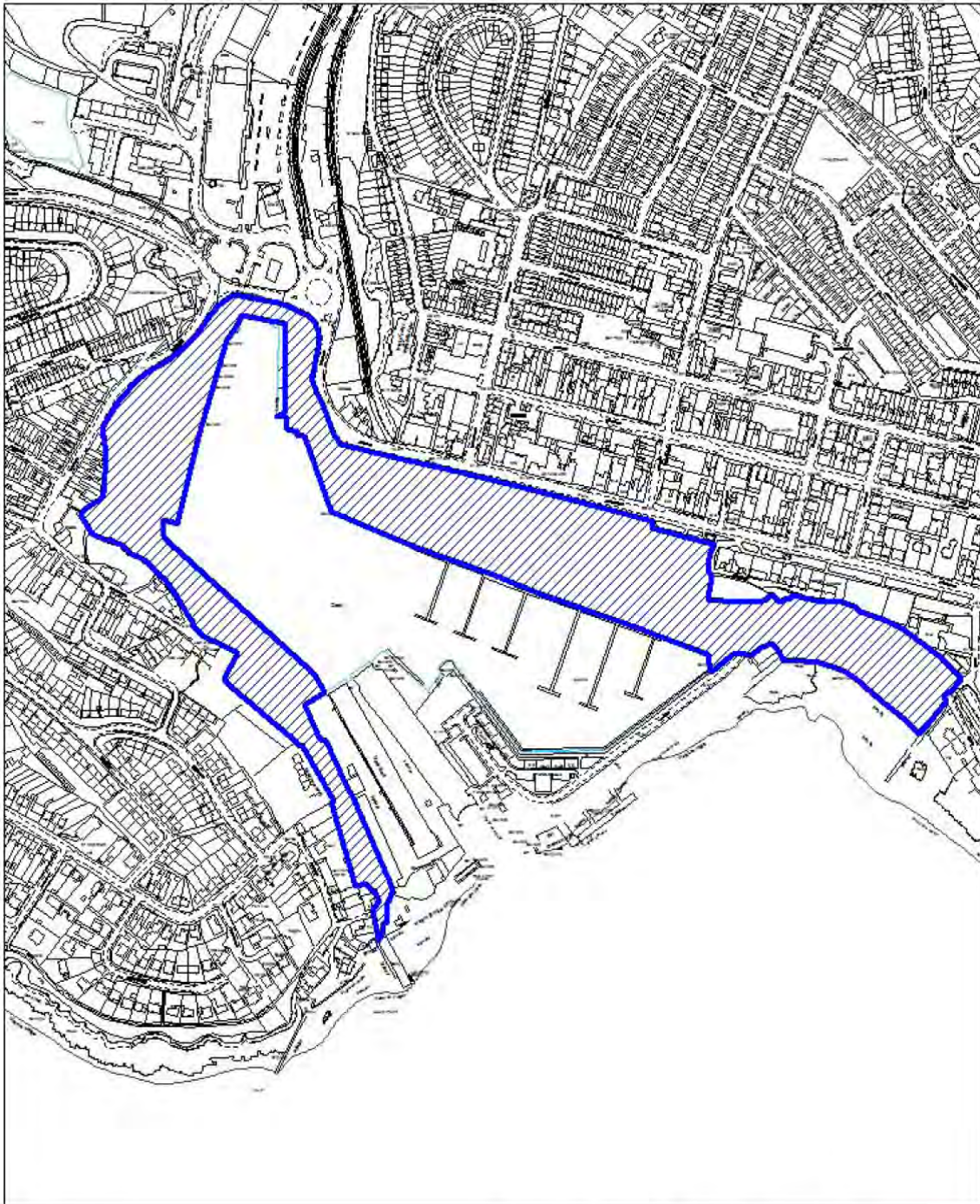
			13. a) Meeting newly arising need (post 2014) by the end of 2019 (Level of need identified within Gypsy Traveller Accommodation Needs Assessment produced end of 2014).	13. a) Need identified in 2014 survey met by the end of 2019.	13. a) Identified need not met by 2019.	
			13. b) Meeting newly arising (2016) need by the end of 2021 Level of need identified within Gypsy Traveller Accommodation Needs Assessment (produced end of 2016)	13. b) Need identified in 2016 survey met by the end of 2021.	13. b) No trigger.	
			14. Number of applications approved contrary to the protective aim of policy GN33.	14. 0	14. 3 over 3 years.	
<p>Sources of information and frequency of update:</p> <ul style="list-style-type: none"> a. <i>Annual joint housing land availability studies (JHLAS)</i> b. <i>Swift – monitoring of planning applications – ongoing.</i> c. <i>Annual County Council monitoring of new community facilities.</i> d. <i>Gypsy Traveller Accommodation Needs Assessment</i> 						
Delivering design excellence and environmental quality (B)	14 Landscape quality, diversity and distinctiveness are maintained.	SP1 SP13 SP16 GN2 GN3 GN4 GN36 GN37	1. Number of planning permissions granted contrary to policy GN1, the protective aim of criterion 3.	1. 0	1. More than 4 such permissions in 4 years.	
	15 Development does not compromise the		2. Number of housing permissions within Settlement Boundaries as a	2. 2%	2. 5% a year over 4 years.	

<p>And</p> <p>Protecting and enhancing the natural and built environment</p> <p>(J)</p>	<p>favourable conservation status of species and habitats of European significance.</p>	<p>GN39 GN40 GN41</p>	<p>percentage of all housing permissions.</p>			
			<p>3. Number of permissions approved contrary to policy SP16.</p>	<p>3. 0</p>	<p>3. More than 4 in 4 years.</p>	
	<p>16 Waste facilities to meet the County’s requirements.</p>		<p>(Core) 4. a) Amount of Greenfield land lost to development (ha) which is not allocated in the Plan.</p>	<p>4. a) None</p>	<p>4. a) None</p>	
	<p>17 A flourishing historic and built environment.</p>					
	<p>18 High quality sustainable design.</p>		<p>4. b) Amount of Greenfield lost to development outside settlement boundaries.</p>	<p>4. b) None</p>	<p>4. b) None</p>	
			<p>5. Loss of Open Space as a result of development (ha) which is not allocated in the Plan.</p>	<p>5. None</p>	<p>5. None</p>	
			<p>6. Number of planning permissions granted contrary to the aim of policy GN36.</p>	<p>6. None</p>	<p>6. More than 4 in 4 years.</p>	
			<p>7. Number of planning permissions, listed building consents and SAM consents granted contrary to policy GN37.</p>	<p>7. None</p>	<p>7. More than 4 in 4 years.</p>	
			<p>(Core) 8. Amount of new development (ha) permitted on</p>	<p>8. No target.</p>	<p>8. No trigger.</p>	

			<p>previously developed land (brownfield, redevelopment and conversions) expressed as a percentage of all development permitted.</p>			
			<p>(Core) 9. a) Amount of waste management capacity permitted</p>	9. a) No target	9. a) No trigger	
			9. b) Progress towards finding a new Civic Amenity Site to serve SE Pembrokeshire.	9. b) Provision of new site by 2015.	9. b) No planning permission in place by April 2014 and if site is not operational by 2015.	
			9. c) Winsel – Provision of extension to civic amenity site	9. c) Scheme implemented	9. c) No planning permission in place by April 2014 and if site is not operational by 2015.	

Sources of information and frequency of update:
 a. *Joint Housing Land Availability Studies (JHLAS)*
 b. *Swift – monitoring of planning applications.*

Annex 4a MAC120: Amended SP2 boundary in Milford Haven



Policy SP 2

Proposed extension to spatial area

Scale 1:5000

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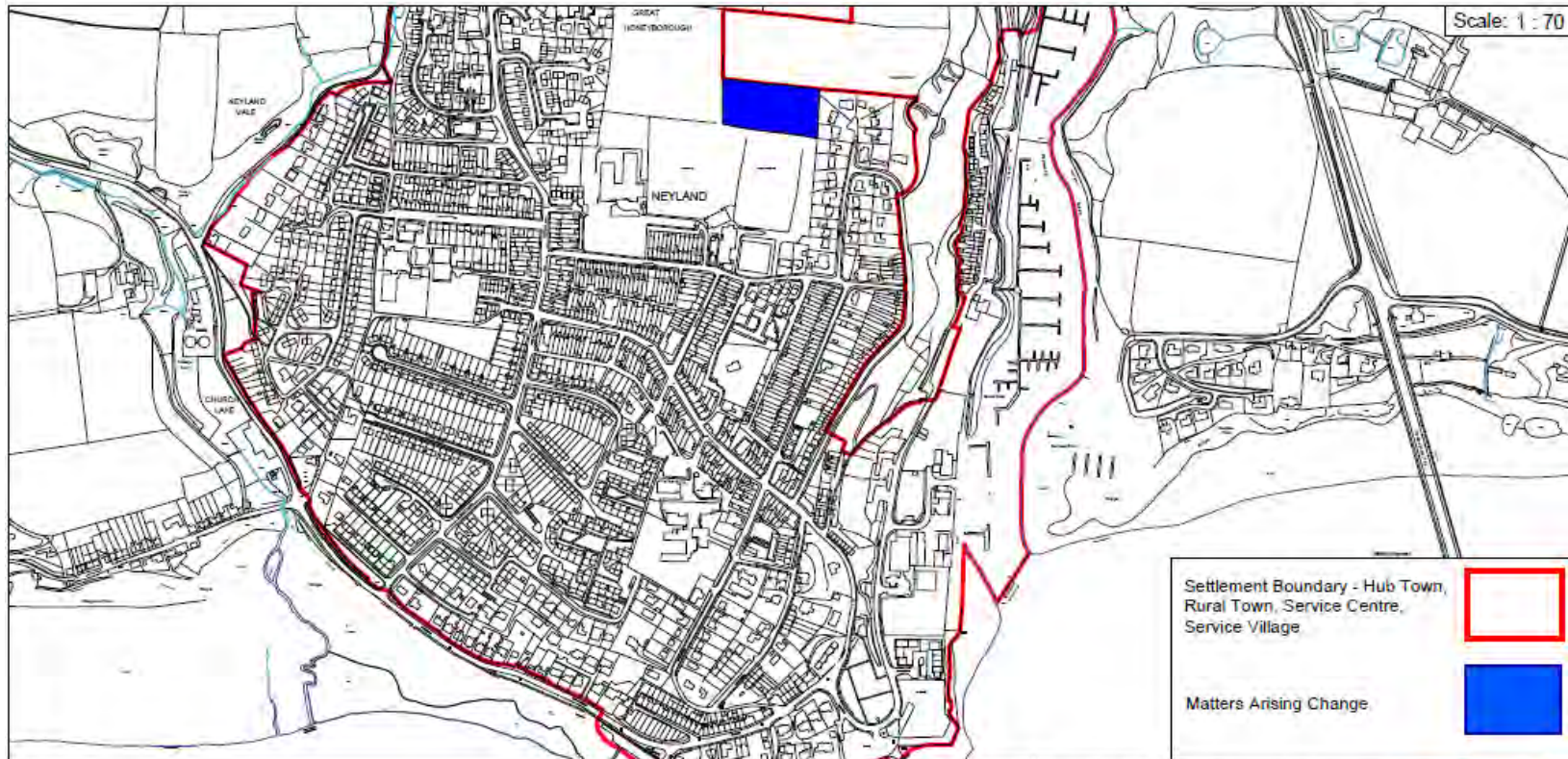
Compiled by on 19 September 2012

Pembrokeshire County Council
Cyngor Sir Penfro



Map Produced by
Development Department
County Hall, Haverfordwest
Pembrokeshire, SA61 1TP
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Annex 4b MAC 121: Recreational Open Space Designation north of the Rugby Football Field in Neyland



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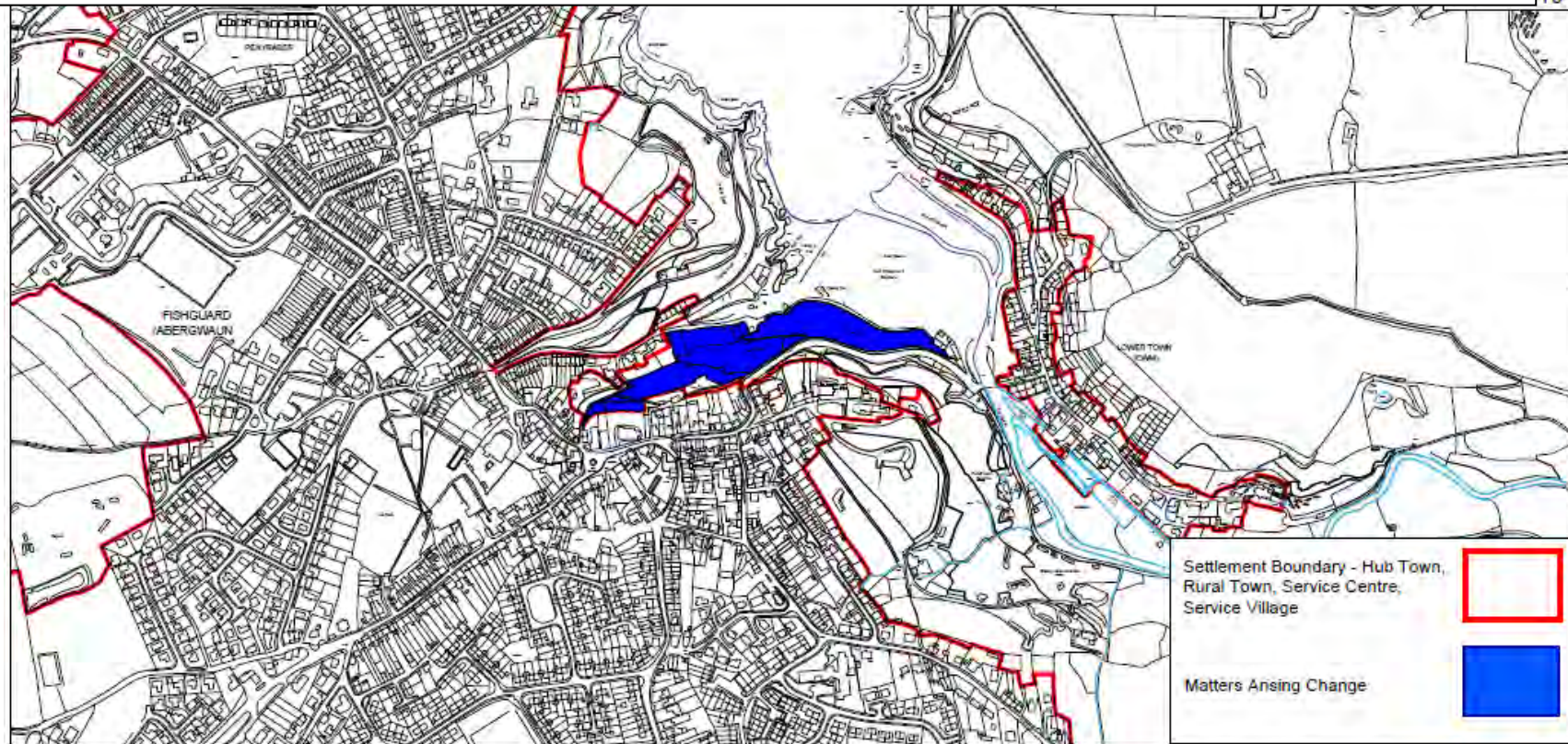
Map produced by the LDP Team,
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Pembrokeshire, SA61 1TP
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Annex 4c MAC 122: Amended Amenity Open Space designation, rear of Glen Side & Nos 1 & 2 Slade Cottages, Fishguard

E

70



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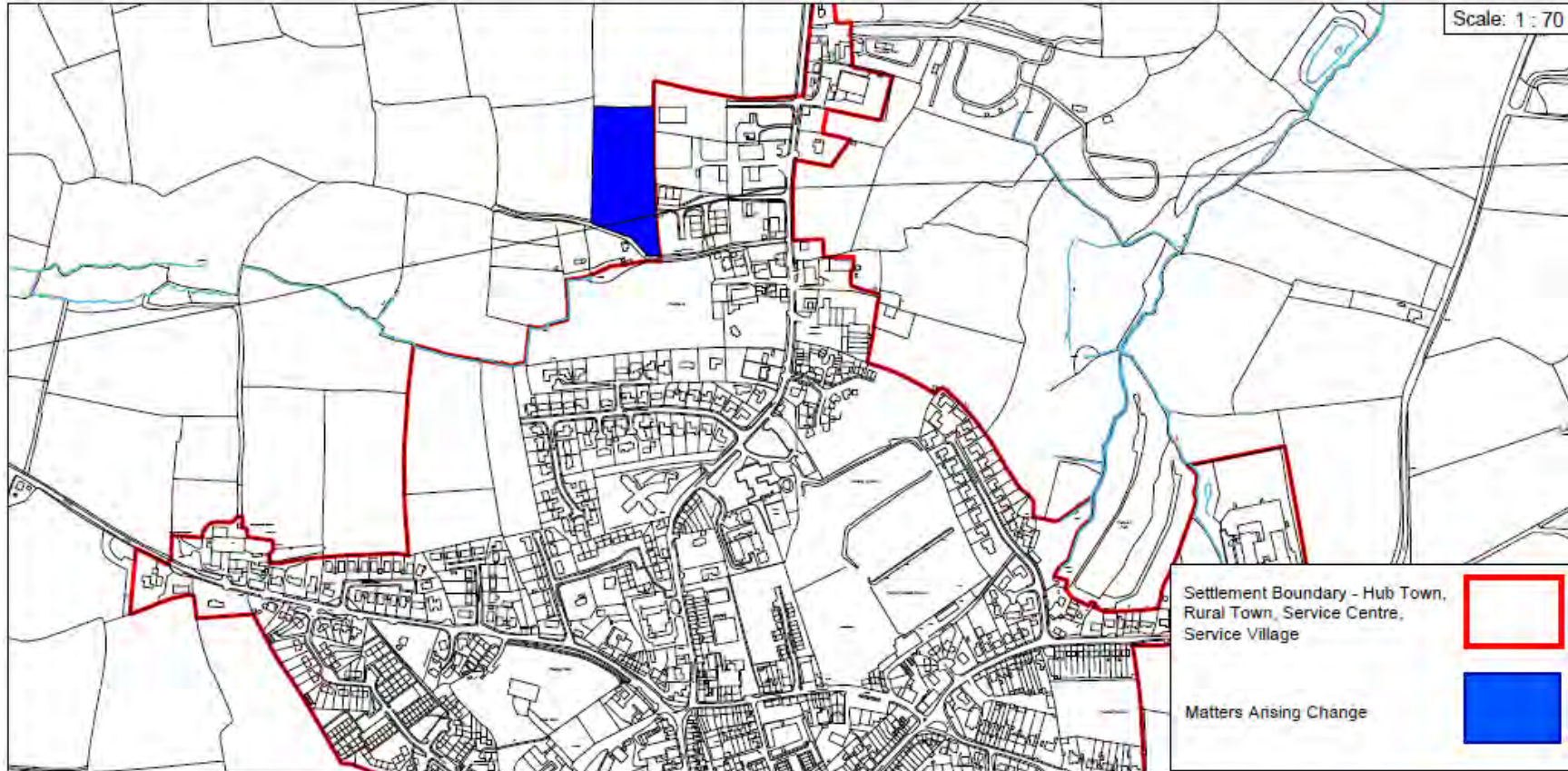
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Tel 01437 764551



Annex 4d MAC 48: New Employment Allocation, Rushacre Enterprise Park extension, Narberth



Scale: 1 : 70



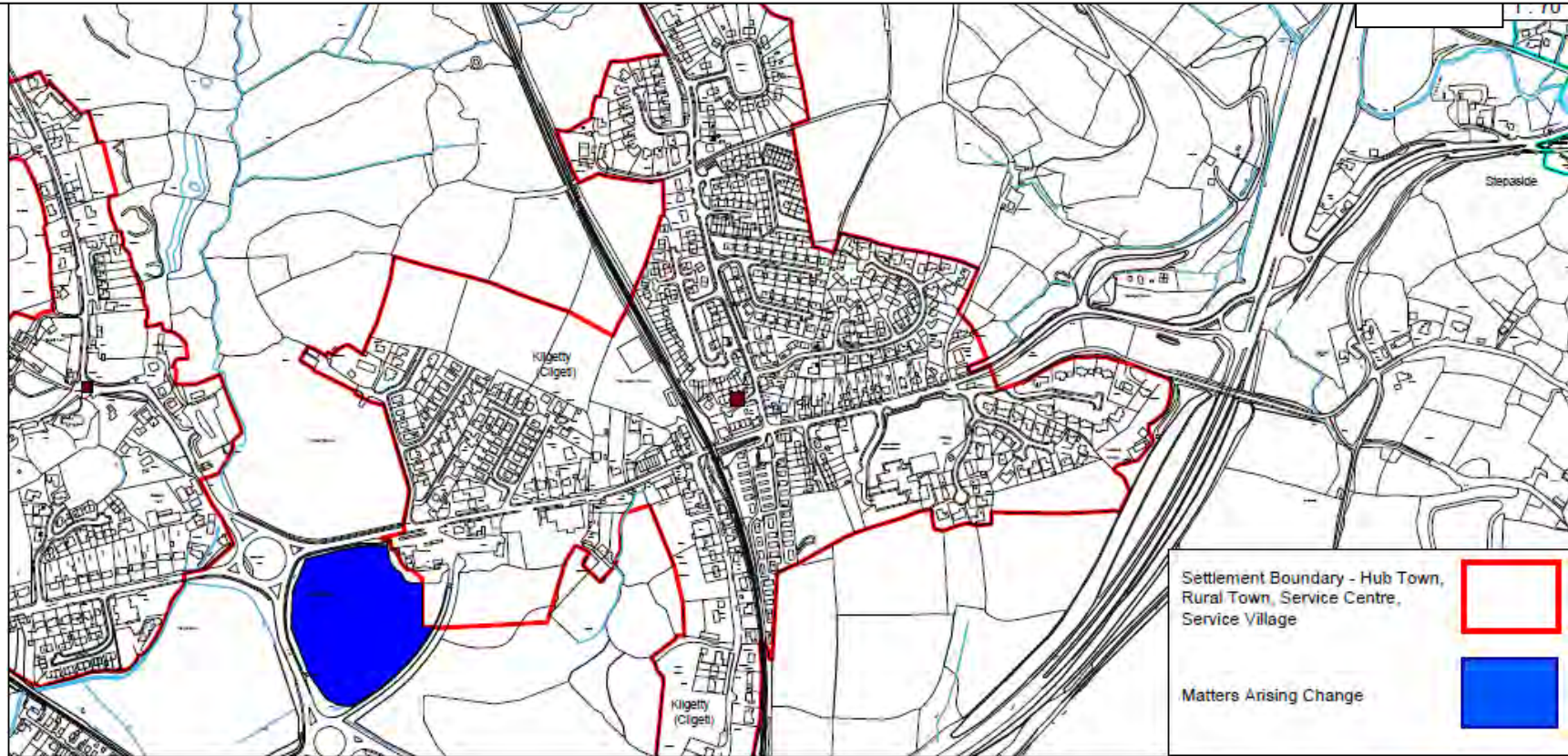
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Annex 4e MAC 123: Amend Recreational Open Space designation Kilgetty Kingsmoor Common to exclude land allocated for retail use



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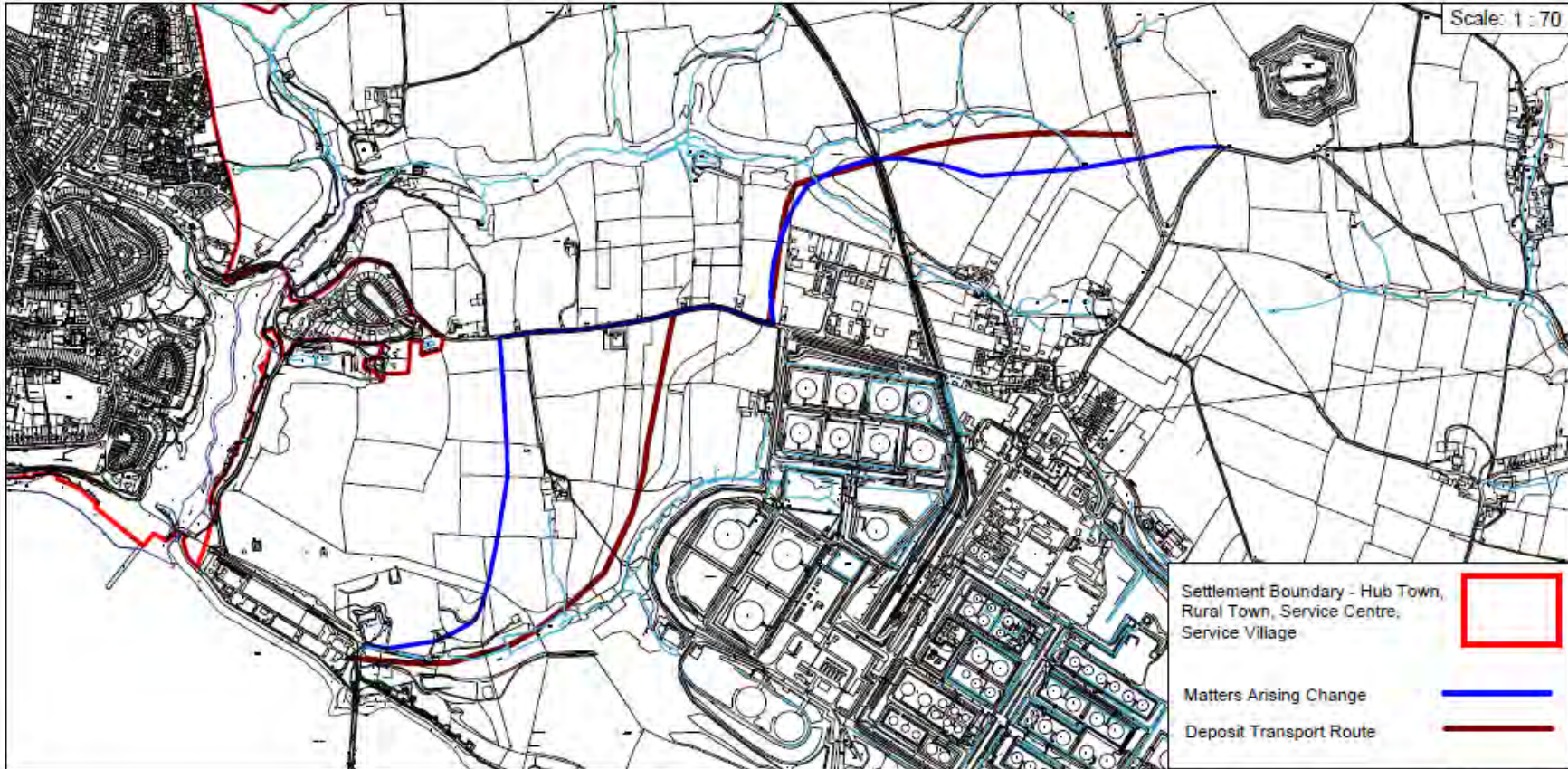
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Annex 4f MAC 124: Amend Blackbridge Access route.



Scale: 1 : 70



Settlement Boundary - Hub Town,
Rural Town, Service Centre,
Service Village



Matters Arising Change



Deposit Transport Route



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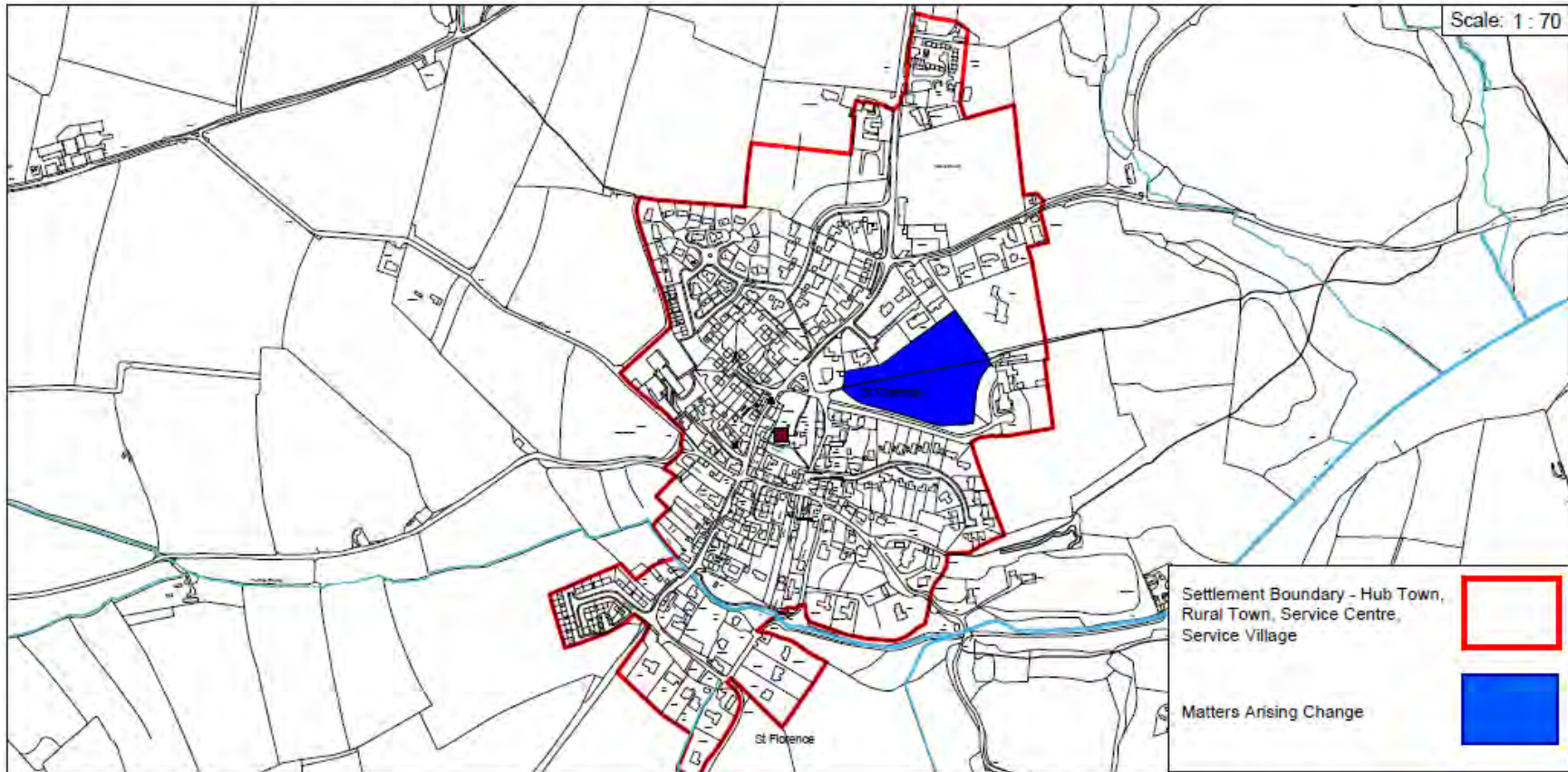


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Annex 4g MAC 125: Amend Amenity Open Space designation, St. Florence



Scale: 1 : 70



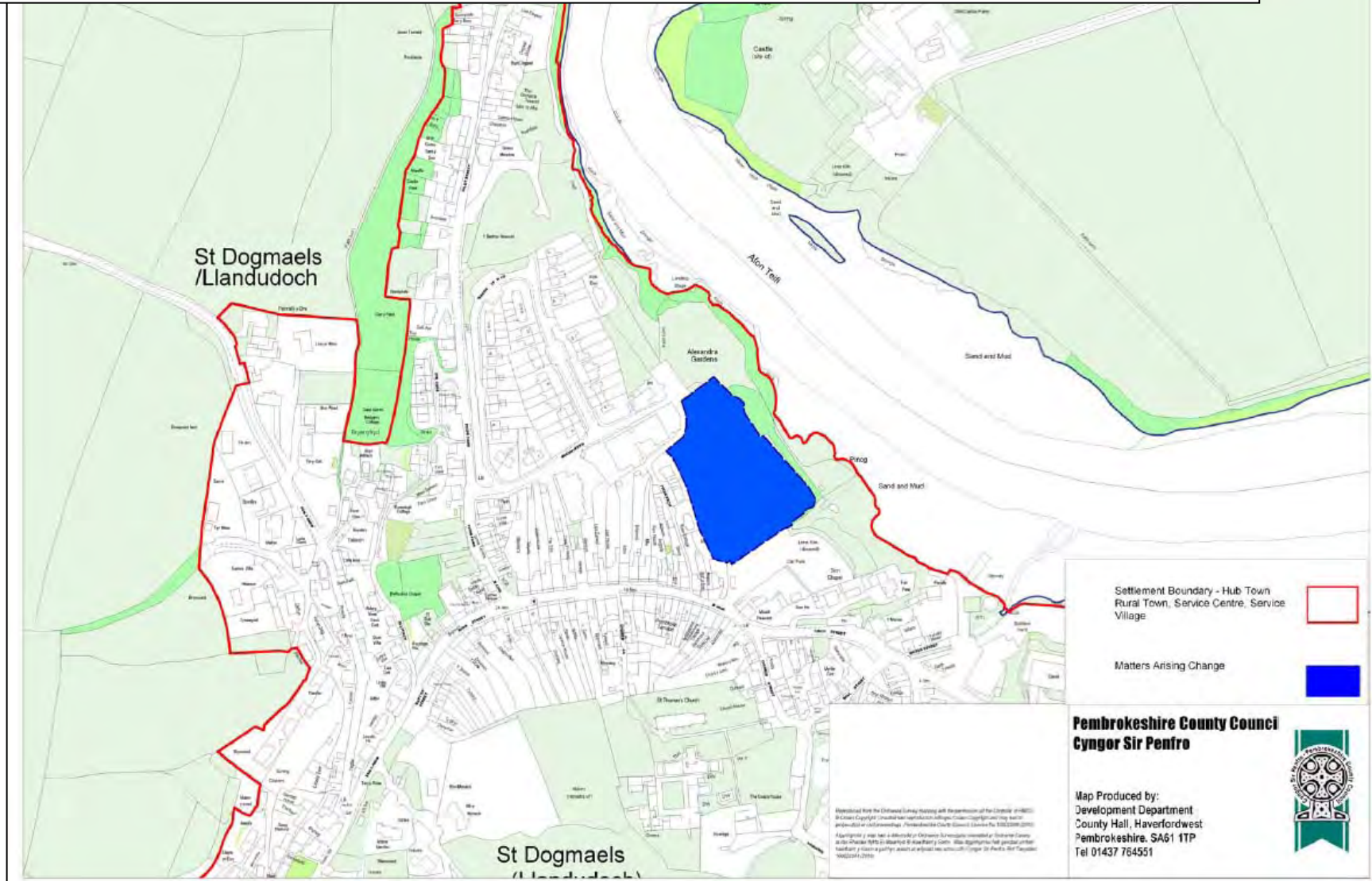
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Annex 4h MAC 128: Retain Recreational Open Space designation at St Dogmaels School Playing Field



Appendix B

Inspector’s binding Recommendations.

**These changes may result in consequential minor editorial changes.
For the avoidance of doubt such changes are also authorised.**

Change Number	Place in Plan	Change				
IC01	Policy SP 12	Policy SP12 - Delete Martletwy from list of 2c Service Villages and include as 2e Small Local Village				
	Footnote 61	Delete final sentence of Footnote 61				
	Key Diagram	Delete Martletwy from Key Diagram				
	Proposals Map Document	Change the position of Martletwy in the Proposals Map Document to reflect the above changes				
IC02	Policy GN.39	Policy GN.39 – Delete Energy from Waste Plant allocation adjoining the Milford Haven (Murco) Refinery - Reference: WST/LDP/086/01				
	Paragraph 6.160 Proposals Map	Delete Paragraph 6.160 Delete New Waste Management Facility from Proposals Map PM26				
IC03	Policy GN.31	Amend policy to read: The development, or extension, of specialist residential accommodation will be permitted where a need for such a facility has been identified and the following criteria are met: 1. In the case of new facilities the development is within or well-related immediately adjoining to a Settlement Boundary, or involves the adaptation or conversion of an appropriate existing building; or 2. In the case of extensions, the scale and nature of the original development together with the extension is compatible with its location; and 3. In all instances access arrangements allow for the safe manoeuvring of pedestrians, cars, ambulances and delivery and service vehicles. Land is allocated for an additional care facility at:				
		<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">Site Name/ Proposed Use</th> <th style="text-align: center;">Area (Ha)</th> <th style="text-align: center;">Reference</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">Park House, New</td> <td style="text-align: center;">1.65</td> <td style="text-align: center;">SSA/089/01</td> </tr> </tbody> </table>	Site Name/ Proposed Use	Area (Ha)	Reference	Park House, New
Site Name/ Proposed Use	Area (Ha)	Reference				
Park House, New	1.65	SSA/089/01				

		Hedges		
IC04	Policy GN.28 Table 2 in Appendix 3 Proposals Map Document	Policy GN.28 - Delete housing allocation at Martletwy, west of Post Office Farm, Reference: HSG/083/LDP/01 and amend columns relating to Number of Units and Site Areas Amend Table 2 in Appendix 3 to reflect deletion of allocation Delete housing allocation Reference: HSG/083/LDP/01 and revise settlement boundary to follow southern edge of minor road on Proposals Map Document Inset Map 38 for Martletwy (see also IC01)		
IC05	Policy GN.28 Table 2 in Appendix 3 Proposals Map Document	Policy GN.28 - Amend housing allocation at Simpson Cross, east of Hill Lane, Reference: HSG/119/LDP/01 to delete that part north-west of the minor road which splits the allocation. Amend columns relating to Number of Units and Site Areas to reflect reduced site area Amend Table 2 in Appendix 3 to reflect amendment to allocation Amend housing allocation Reference: HSG/119/LDP/01 and revise settlement boundary to follow rear boundary of existing dwellings and northern boundary of minor road on Proposals Map Document Inset Map 49 for Simpson Cross		