



Pembrokeshire County Council

Local Development Plan (up to 2021)

(Adopted 28 February 2013)

Review Report

Pre-Deposit Consultation version.

December 2018

Executive Summary

Pembrokeshire County Council is required by the Planning and Compulsory Purchase Act 2004 to undertake a review of the Local Development Plan at intervals no longer than every 4 years from adoption. The LDP was adopted by the Authority on 28th February 2013 and runs until 31 December 2021. The review of the Local Development Plan commenced on 5 May 2017 following local elections, and with the agreement of Welsh Government. It is anticipated that LDP2 will run until the end of 2033.

This Review Report considers where the Local Development Plan needs to be changed and why. In deciding what needs to be changed, the Authority has considered key contextual changes, such as changes to Welsh Government national policy and legislative changes, updates to the evidence base which point to a need for the Plan to be changed, and the Annual Monitoring Reports published by the Authority. These indicate whether the Plan is working and whether there are areas of concern which should be considered within the review.

Significant contextual change includes the Well-being of Future Generations (Wales) Act 2015 and the requirement for the Public Service Board partners to publish a Well-being Plan; the Planning (Wales) Act, 2015; the Environment Act, 2016 and the Historic Environment Act (Wales), 2016. Other contextual changes include national planning policy revisions and continuing uncertainty around local government reorganisation and the wider economy. Further uncertainty exists around the economy and European legislation in light of the UK's decision to leave the EU.

Current projections (2014 based) for Pembrokeshire population and households indicate that the population of Pembrokeshire is likely to fall over the period to 2039 by some 1,500 people (1.2%), with reductions in all age groups apart from those aged 75 and over. The majority of this reduction will take place after the end of LDP2 plan period. During LDP2 (end date 31 December 2033) the population is anticipated to fall by about 250 persons only.

These overall figures for Pembrokeshire do however mask differences to population change within the area of Pembrokeshire Coast National Park and Pembrokeshire outside the National Park (Pembrokeshire-out). Whilst the National Park population is expected to decline over the plan period, the population of Pembrokeshire-out is expected to increase by approximately 3,088 persons. The population increase is anticipated to be driven by in-migration, and will counter an expected fall in births and annual rise in deaths within the naturally ageing population.

There is also a projected rise in the number of households within Pembrokeshire (projected to be 56,400 in 2039, having reduced from an expected maximum of 56,700

between 2029 - 2034)¹ and a reduction in their size to an average 2.11 persons per household, and 2.16 persons per household outside the National Park driven by increased population in older age groups.

The AMRs highlight areas of concern in relation to the following.

- Vacancy rates of retail and commercial premises within town centres
- % of permissions for major office, retail and leisure development permitted within the town centres
- The number of Gypsy and Traveller pitches gaining planning permission, (although recent planning consents have met a significant amount of the need identified).
- The supply of sand and gravel aggregates across the South West Wales region
- The delivery of strategic employment sites
- The delivery of strategic housing sites
- The delivery of safeguarded transport routes
- The most recent AMR 5 (2017-2018) identifies that 52% of housing development permitted was on allocated housing sites and that annual dwelling completions is below the LDP target.

There are therefore clear contextual changes and issues identified through the AMR to be considered within the review of the Local Development Plan. There may well be further changes which have yet to emerge and this will be taken into account wherever possible during the plan making process. A full review of the Local Development Plan is required.

¹ <http://gov.wales/docs/statistics/2017/170323-household-projections-local-authorities-2014-based-en.pdf>

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Abbreviations

| | |
|----------|---|
| AMP | Asset Management Plan (Dŵr Cymru / Welsh Water) |
| AMR | Annual Monitoring Report |
| GTAA | Gypsy Traveller Accommodation Assessment |
| HRA | Habitats Regulations Appraisal |
| JHLAS | Joint Housing Land Availability Study |
| LHMA | Local Housing Market Assessment |
| LDP (2) | Local Development Plan (2) |
| PCC | Pembrokeshire County Council |
| PP Wales | Planning Policy Wales |
| PSB | Public Service Board |
| SA | Sustainability Appraisal |
| SEA | Strategic Environmental Assessment |
| TAN | Technical Advice Note |
| WbP | Well-being Plan |

1. Introduction

1.1 Background

- 1.1.1 The Pembrokeshire Local Development Plan (LDP) was adopted 28 February 2013. It sets out the Council's policies for the development and use of land within the County (excluding the area of the Pembrokeshire Coast National Park) until 2021.
- 1.1.2 The Planning and Compulsory Purchase Act 2004 requires each local planning authority to prepare a Local Development Plan, and to keep it under review. In order to ensure that the LDP remains up-to-date, the Council is required to undertake a full review of the adopted LDP at intervals of no longer than 4 years from the date of adoption. It has monitored the LDP on an annual basis and published 5 Annual Monitoring Reports (AMRs) at the time of writing this report. The AMRs assessed the need for an early review of the Plan and concluded that generally the Plan is performing well and either a full or partial review of the Plan is not necessary, including on sustainability grounds², prior to the mandatory review requirement.
- 1.1.3 A full review of the adopted LDP commenced May 5th 2017 and this Review Report sets out the extent of changes required to the LDP and the procedure to be followed. The recommended changes to the LDP have been informed by the AMR reports (including Strategic Environmental Assessment, Sustainability Appraisal and Habitats Regulations Appraisal process) and surveys and updates to the evidence base. Policy and other contextual changes are also a key influence on the review, including changes to national policy, legislation, and local contextual changes.
- 1.1.4 This report highlights where the Plan is delivering, what needs to change and why. **It does not consider the changes which may be appropriate to the plan. These will be addressed later in the process.**

1.2 Review Process

- 1.2.1 This Review Report considers the evidence for change and specifically
- The findings of the LDP Annual Monitoring Reports and any issues arising from Sustainability Appraisal (SA) monitoring
 - Updated survey evidence which has been assessed against the 3 tests of soundness³

² [AMR Monitoring Report 3: 2015-2016](#). Conclusions and Recommendations. Page 62

³ The tests of Soundness of a Local Development Plan determine whether the plan is 'sound', namely that it meets all 3 soundness tests (Planning Policy Wales Edition 9). Local Development Plan

- Relevant contextual changes including national policy.

1.2.2 The Council will continue to take account of emerging evidence in the review of the Local Development Plan. In some cases contextual change or updated evidence is provided by other agencies and bodies and such evidence will need to be taken into account as the Plan progresses towards adoption. The LDP Annual Monitoring Reports will also assess the implications of these. Future anticipated changes to context and national policy will be taken into account wherever feasible during the review of the plan. It is currently anticipated that these will comprise

- revised Planning Policy Wales, Edition 10
- the Welsh National Marine Plan
- the National Development Framework
- revisions to Local Development Plan Manual 2,
- and potential changes forming part of the Review of Use Classes and Permitted Development.

1.2.3 The steps the Council has taken to involve key stakeholders in the review of the Plan are set out (Appendix 1). How this engagement has helped to shape the recommendations for review is set out within Appendix 4: Summary of Policy Effectiveness. Formal consultation on the Review Report is taking place alongside the Preferred Strategy and more detail about this was set out in the Delivery Agreement which incorporates the Community Involvement Scheme. The Delivery Agreement was approved by Welsh Government on the 7th June 2018 and has been published in accordance with Regulation 10 of The Town and Country Planning (Local Development Plan) (Wales) (Amendment) Regulations 2015.

1.2.4 The Local Development Plan must be found to be sound by the Planning Inspectorate, for it to be Adopted by the Authority. The Tests of Soundness help to establish where change is required and to ensure that changes are appropriate. The tests are:

- **Test 1: Does the Plan fit?** (i.e. is it clear that the LDP is consistent with other plans?)
- **Test 2: Is the Plan appropriate** (i.e. is the plan appropriate for the area in the light of the evidence?)
- **Test 3: Will the plan deliver** (i.e. is it likely to be effective?)⁴

Manual2 provides key questions which help to establish whether the tests of soundness have been met.

⁴ Further details of the tests are set out in the LDP 2 Delivery Agreement

1.2.5 The Review Report is required to set out where the Plan should be changed. It does not however suggest ways in which policy or strategy should be changed. A sustainability appraisal (SA) is difficult to undertake without consideration of the way in which the plan may be changed. This Review Report therefore highlights where the sustainability appraisal implications should be addressed, based on SA and LDP1 monitoring and where there is a need to amend the sustainability objectives in the light of contextual change and the legislative framework, including the implications of the Well-being of Future Generations (Wales) Act. Section 3.4.2 of the LDP Manual (Edition 2) states that the methodology of the original SA is likely to be most appropriate. This is the approach taken. The SA framework remains relevant and therefore the SA objectives would be taken forward and reviewed where appropriate.

2. Annual Monitoring Reports - Triggers for Further Investigation

2.1 Introduction

2.1.1 The Authority is required to prepare Annual Monitoring Reports of the Local Development Plan to cover the preceding period of 1 April to 31 March. The most recent published AMR was submitted to Welsh Government in October 2018 (AMR 5) and covers the period 1 April 2017 to 31 March 2018 . The AMRs assess whether the LDP strategy, policies and sites are being delivered in line with the vision and objectives of the Local Development Plan⁵. This review is required to take account of the findings of the AMRs.

2.1.2 The most recent published AMR 5 continues to identify the following key areas of concern⁶. They are considered in more detail below.

- Vacancy rates of retail and commercial premises within town centres
- % of permissions for major office, retail and leisure development permitted within the town centres
- The number of Gypsy and Traveller pitches gaining planning permission, (although recent planning consents have met a significant amount of the need identified)
- The supply of sand and gravel aggregates across the South West Wales region, including the planning area of Pembrokeshire County Council
- The delivery of strategic employment sites
- The delivery of strategic housing sites
- The delivery of safeguarded transport routes

In addition, AMR5 identifies that 52% of housing development was permitted on allocated housing sites and that annual dwelling completions is below the LDP target.

The review of the Plan will seek to address these issues.

2.1.3 The above indicators suggest that the strategic development sites are not coming forward as anticipated and the Local Development Plan strategy is not being delivered in these respects. This is discussed in more detail in Section 4 below.

2.2 Town Centres

2.2.1 The vacancy rates of commercial and retail premises within the Authority's town centres (Haverfordwest, Milford Haven, Pembroke, Pembroke Dock, Narberth and Fishguard) is an indicator which reflects the general health of these town

⁵ Chapter 4 'Vision and Objectives' of the Local Development Plan

⁶ Please refer to AMR 3 2015-2016 and AMR 4 2016-2017 for further information on additional policy areas which met the trigger for further investigation.

centres. Vacancy rates have been identified as a concern within several AMRs for many of the town centres where vacancy for shops is 5% or more above national average vacancy. This is currently the case at Pembroke Dock, Milford Haven, Fishguard and at Haverfordwest whilst a redevelopment scheme is underway. The situation is generally a reflection of economic conditions affecting retail and commercial centres, however revision of the retail strategic and general policy approach taking account of contextual policy changes to National Planning Policy Wales (Edition 9) and Technical Guidance 4 on Retail and Commercial Centres (November 2016) could help to address this concern.

- 2.2.2 The % of permissions for major office, retail and leisure development permitted within town centres (expressed as a % of all major development permitted) has consistently been triggered within the AMR reports. National Planning Policy requires that out-of-centre retail and commercial development satisfy tests of need, the sequential approach and impact. In each case the development has satisfied these tests and was acceptable. It will be appropriate however to review allocations for retail development, and LDP policy to ensure compliance with National Planning Policy (Planning Policy Wales Chapter 10 and TAN4 'Retail and Commercial Centres').
- 2.2.3 The review will also take account of the Regional Retail Capacity Study (2017) which provides (i) evidence on the need for convenience, comparison and bulky goods retail development over the lifetime of LDP2; (ii) health assessments of town centres and also; (iii) revisits the retail allocations of the LDP.

2.3 Gypsy and Travellers Accommodation Needs

- 2.3.1 A Gypsy and Traveller Accommodation Needs Assessment, (GTANA), which informed the requirement within the Local Development Plan, was undertaken in 2010 and identified a need for 40 additional pitches. This need was not met by 2015. The assessment of Gypsy and Traveller accommodation needs, and the duty to make provision for sites where the assessment identifies need, became statutory requirements under the Housing (Wales) Act 2014. The Council has produced an updated Gypsy Traveller Accommodation Assessment (GTAA 2015) which has found that there is a reduced need for pitches – 32 residential pitches, plus two travelling showpeople's yards required for the next 5 years - a lower need than previously indicated. This rises to a projected 37 residential pitches, plus the two travelling showpeople's yards up to 2021. There will be a need for 101 pitches plus 2 yards by 2031.
- 2.3.2 The existing need has been grouped into three locations which reflect the general locations within which residents have expressed a desire to live. These are Haverfordwest, Kilgetty and Pembroke / Pembroke Dock. However, the majority of the increase from the GTAA 2015 is based on household growth alone and there are inherent difficulties in using the results of this single survey to predict growth so far in advance. The requirement to undertake a new GTAA

at least every five years will result in more reliable assessments of need during the plan period.

- 2.3.3 In addition, there may be an under provision of transit pitches and/or temporary stopping places within the County, although the level of need has been difficult to quantify.
- 2.3.4 Since the GTAA survey of November 2015, a total of 30 Gypsy and Traveller pitches have gained planning permission on both private and public sites. Planning permission has also been granted for a Travelling Showperson's yard. The policies of the Local Development Plan are considered to be working well.
- 2.3.5 An allocation for 15 pitches at the former Kingsmoor Common Kilgetty has received planning permission for 12 pitches and grant funding has been approved by Welsh Government to bring this site forward.
- 2.3.6 Welsh Government Circular 'Planning for Gypsy, Traveller and Showpeople Sites' was issued in June 2018 and provides an updated policy context. The guidance provides a new context for the consideration of planning applications for Gypsy, Traveller and Show persons sites and will require an amendment to the current LDP policy approach.

2.4 Supply of Sand and Gravel Aggregates

- 2.4.1 The LDP mineral reserve for sand and gravel is based on a Pembrokeshire-wide assessment. A new approach to land-based sand and gravel apportionment was introduced for south west Wales during AMR2. It considers this aspect of the minerals land-bank across a wider region covering Pembrokeshire, Ceredigion and Carmarthenshire, to encourage co-operation between these authorities in finding a longer-term solution to the aspiration of reducing future production within the National Park. (The National Park Authority is not required to maintain minerals landbanks). There will therefore be a need to work in collaboration to address apportionment during the LDP review. A South West Wales Mineral Planning Group has been established to consider apportionment and, if possible, find new terrestrial sand and gravel production sites in co-operation with mineral operators. A new approach to the treatment of dormant sites will also be required.

2.5 Delivery of Strategic Employment Sites

- 2.5.1 Strategic employment sites are identified within the Local Development Plan to implement the objectives of the Plan to sustain and enhance the rural economy, and build on the County's strategic location for energy and port related development. 97.55 hectares are allocated at strategic employment sites and 75 hectares of land for local employment use. This approach specifically addresses the need for a range and choice of sites to meet the requirements of the sector. They are allocated to support future port and energy related

activities in proximity to the Milford Haven Waterway, to support employment at the County Town of Haverfordwest and to enable re-development at the former Royal Naval Armaments Depot at Trecwn, which is considered to be an opportunity site, with potential to link to activities at Fishguard and Goodwick and to the rail network. The employment survey for 2017 has been published to the PCC website. and an employment survey will be commenced during 2018.

2.5.2 The LDP allocates 4 strategic employment sites within Policy SP3 of the LDP.

Blackbridge - Egnedol applied for a biomass energy project including the allocation and also substantial areas of additional land beyond this. However, this 'development of national significance' (DNS) planning application was refused by Welsh Ministers in 2018.

Pembrokeshire Science and Technology Park – this site includes the Bridge Innovation Centre (formerly the Technium) and also a new industrial building (in the SE part of the site) which was completed in 2015/2016.

Withybush Business Park has attracted a few relatively small proposals including a class B8 commercial unit and a place of worship. Additional consents relate to storage use and fitness centre. A 'Pembrokeshire Food Park' proposal at Withybush and within the Enterprise Zone, encompassing both the strategic employment and employment allocations has acquired funding for incubator units and planning applications are anticipated for 2018. The proposal has significant employment potential and the review of the plan should take proposals into account.

At Trecwn, the permitted diesel-fired peaking plant (2012) within the LDP's strategic employment allocation has yet to come forward. A biomass power station has been consented in a part of the Trecwn Valley outside the allocated area.

2.5.3 Generally, the concept of high quality business parks has had limited take up in Pembrokeshire. A review of strategic employment sites is therefore required. The review will take into consideration the recent designation of the Haven Waterway Enterprise Zone, the spatial definition of the Enterprise Zone and its implications for Employment Strategy. The Regional Employment Study will also influence the future strategy for employment sites. This study will refer to the Swansea Bay City Deal, aspects of which relate to sites in Pembrokeshire.

2.6 Delivery of Strategic Housing Sites

2.6.1 Three strategic housing sites are allocated within the LDP at Slade Lane north and south, Shoals Hook Lane, Haverfordwest and Maesgwynne, Fishguard. The sites have had varied success in attracting planning applications, and

Shoals Hook Lane has yet to attract an application. The ability of the market to build large sites has influenced this. The deliverability of these sites will need to be considered during review. Strategic housing developments will also need to reflect any changes to the strategy of the LDP decided during review.

2.7 Delivery of Safeguarded Transport Routes

2.7.1 LDPs safeguard programmed and financed transport infrastructure proposals likely to be delivered within the Plan period. However, their delivery is beyond the remit of the LDP, although the AMRs provide information on progress towards their implementation. Since the LDP was prepared, some of the safeguarded schemes have been delivered, but in many cases programming and funding arrangements for unimplemented schemes has significantly changed since LDP adoption in 2013. Hence there is a need to consider the continued deliverability of unimplemented schemes identified within the LDP, to see whether any new schemes require safeguarding and to update and remove delivered schemes. Appendix 3 provides further information on the current status of existing safeguarded schemes and new schemes that might be considered for safeguarding.

2.7.2 This section of the Review Report considers the findings of the AMRs and their impact on the LDP review. Contextual and other changes which will influence LDP2 can be found at Sections 4 and 5.

3. Vision and Objectives

3.1 Vision

- 3.1.1 The LDP provides a vision of what the County should be like at the end of the Plan Period (2021). The overall vision of the LDP describes the land use elements of the Vision for Pembrokeshire as set out in the Wales Spatial Plan (People, Places, Futures: The Wales Spatial Plan 2008 Update) and Pembrokeshire's Community Plan (Update 2009)⁷ which was in existence at the time. The Vision states

The LDP Vision:

“To ensure that Pembrokeshire is prosperous and that it remains vibrant and special by creating: a network of strong urban and rural communities in Hub Towns, Service Centres, Service and Local Villages supported by a robust, sustainable, diverse high value-adding economy underpinned by the Area’s unique environment, maritime access to the Milford Haven Waterway and Fishguard Harbour and internationally important energy and tourism opportunities.”

- 3.1.2 Seminars have taken place with Members of the Authority and Key Stakeholders on the draft Vision, Objectives and Issues for LDP2 as well as a wider public consultation. A revised Vision, Objectives and Issues are included within the consultation draft Preferred Strategy, published for consultation alongside this Review Report.

The Well-being Plan

- 3.1.3 To inform the Well-being Plan, the Well-being of Future Generations (Wales) Act 2015 requires Public Service Boards to first assess the state of well-being in its area and communities. Public bodies in each local authority area are required to work together to improve the economic, environmental, social and cultural well-being of its area and the communities within it. The Well-being Assessment for Pembrokeshire was published in April 2017⁸. The overall conclusions found that ‘well-being’ to the people of Pembrokeshire comprises good health, enough money for essentials and good relationships. In terms of future trends for Pembrokeshire, the Well-being Assessment identified:-

- (a) An ageing and longer lived population

⁷ The Pembrokeshire Community Plan (2010-2025) was prepared on behalf of the Local Service Board, and subsequently replaced by the Single Integrated Plan (2013-2018) following Welsh Government guidance in 2012. In turn, the SIP is to be replaced by a Well-being Plan as required by the Well-being of Future Generations (Wales) Act 2015, and produced by the Public Service Board.

⁸ <https://www.pembrokeshire.gov.uk/content.asp?nav=101,2434,2438>

- (b) Climate change is likely to bring about a warmer and wetter climate for Pembrokeshire
- (c) Pembrokeshire's economy is comparatively weak and it is geographically remote from major city regions where economic growth is currently fastest.
- (d) Trends for public services point to a continued reduction in resources available in real terms and the amount of resources required for health and social care services will continue to increase in real terms.

3.1.4 The Well-being Plan for Pembrokeshire was published in May 2018 by the Pembrokeshire Public Service Board (PSB) and identifies guiding principles which shaped the Plan. These are

- Listening
- Understanding
- Changing
- Sustainable development
- Leading by example
- Other important plans and strategies
- Welsh language

3.1.5 Engagement on the Well-being Assessment identified key emerging issues and enabled two broad Well-being objectives to be identified within the Well-being Plan -.

| | Objective | Priorities |
|---------------|--|---|
| Who We Are | We want to help our people, communities and organisations so that we can support ourselves and each other | Priority 1: Living and Working Priority 2: Resourceful Communities |
| Where We Live | We want to protect and enhance our natural assets whilst optimising economic prospects, accessibility and health for all | Priority 3: Tackling Rurality Priority 4: Protecting Our Environment |

There is no vision for the Well-being Plan, it does however identify eight cross cutting projects for the Public Service Board -

1. Recruitment and Employment Transformation Framework
2. Environmental and Climate Change Risk Assessment

3. Becoming a Carbon Neutral
4. Doing things Differently
5. Celebrating the Great Outdoors
6. Community Participation
7. Understanding Our Communities
8. Meaningful Community Engagement

3.1.6 The PSB will produce an annual report on how it has worked to meet the objectives. The review of the Local Development Plan will take account of the objectives and priorities of the Well-being Plan and annual reports.

3.1.7 The Vision for LDP2 should continue to align with the Wales Spatial Plan Vision⁹, (2008 update), until replaced by the National Development Framework, and would benefit from being compatible with the objectives of the Well-being Plan.

3.1.8 To ensure consistency, the LDP1 vision has been assessed against the 7 well-being goals. These are:

- A prosperous Wales
- A resilient Wales
- A healthier Wales
- A more equal Wales
- A Wales of cohesive communities
- A Wales of vibrant culture and thriving Welsh language
- A globally responsible Wales

3.1.9 The LDP1 vision generally aligns with the well-being goals in many respects however, it pre-dates the enactment of the Well-being of Future Generations (Wales) Act 2015 and amendment is required if it is to address the goals fully, particularly in relation to environmental, social and cultural goals.

3.2 Objectives

3.2.1 The key principle to deliver the Plan is identified as being sustainable development; the objectives and sub objectives that underpin this key principle and the Vision are identified within the Plan. The LDP includes 10 objectives and 23 sub objectives across economic, environmental, social and cultural factors.

⁹ Wales Spatial Plan Vision : “We will sustain our communities by tackling the challenges presented by population and economic change. We will grow in ways which will increase Wales’ competitiveness while assisting less well-off areas to catch up on general prosperity levels and reducing negative environmental impacts. We will enhance the natural and built environment and we will sustain our distinctive identity”.

- 3.2.2 Some revision will however be required to ensure that the objectives and sub objectives of the LDP contribute to the strategic objectives of the SIP, the Well-being Plan when in place and well-being goals.
- 3.2.3 Proposed changes to the draft LDP Vision and Objectives following Member and Key Stakeholder Seminars and public consultation will be included within the Preferred Strategy.

4. LDP Strategy

4.1 Distribution of Growth

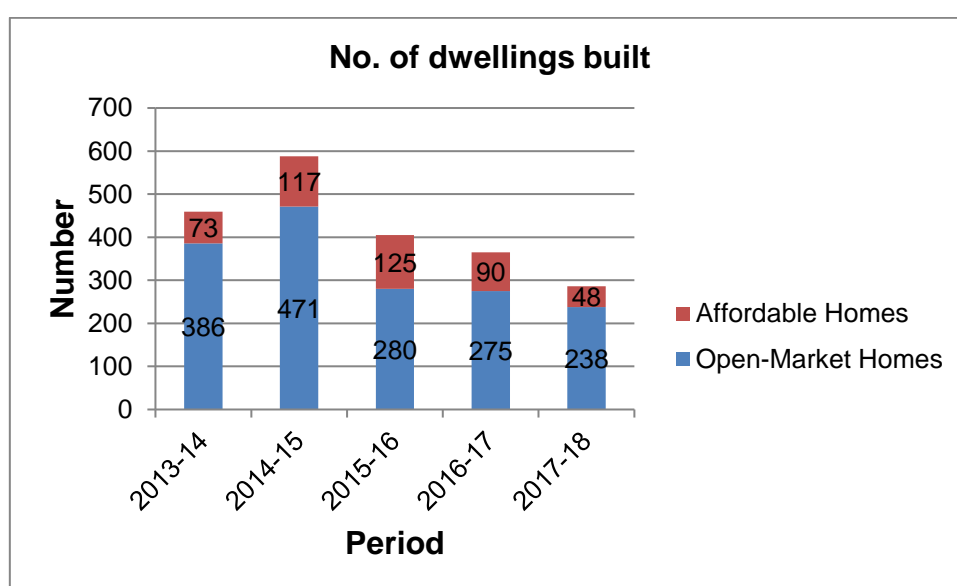
- 4.1.1 The LDP strategy focuses on enabling development in accordance with the objectives and sub objectives of the LDP. It includes a settlement strategy that aims to achieve a balanced distribution of new development between urban and rural Pembrokeshire, and to address imbalances in the age profile of the population, for example by assisting young people to set up new households in rural villages. Within the rural areas, growth is focused on those settlements with a good level of service provision. At adoption, it was anticipated that 60% of housing would be built in urban areas and 40% in rural areas, with growth in rural areas focused on those settlements with a good level of service provision. The settlement hierarchy has been established based on the level of services and community facilities supporting a settlement, with growth anticipated in settlements with existing facilities. A review of rural settlement facilities was undertaken in 2017 and has been published within the Rural Facilities update paper 2017. Engagement with Authority Members and Stakeholders, including Town and Community Councils has helped to refine information on services and weighting attached to identified services.

The LDP Settlement Hierarchy -

1. Hub towns
2. Rural Settlements
 - 2a Rural Town
 - 2b Service Centres
 - 2c Service Villages
 - 2d Large Local Villages
 - 2e Small Local Villages

- 4.1.2 Amendments to the settlement hierarchy and to the position of settlements within it, will be taken into account in the review of the plan.
- 4.1.3 During AMR3 (1 April 2015 – 31 March 2016) permissions for housing resulted in 922 homes being granted planning permission. Of these 39% were in Hub Towns, 5% in Narberth (Rural Town), 50% in other rural settlements and 7% in countryside areas. Whilst this demonstrates a reduction in urban focus as

compared with previous years, the Plan was still compliant with the monitoring target, with consents in hub towns at 63.5% over a 3 year period and indicates delivery in accordance with the strategy of the Plan. Within AMR4 (1 April 2016 – 31 March 2017), this trend continued with 37% of all residential permissions permitted within Hub Towns (the target is 50%). During AMR5, there has been a renewed focus on the Hub Towns with 52% of housing consented at Hub Towns, 18% at Narberth Rural Town, 28.5% in other rural settlements, and 4.5% in the countryside. Considered against the ‘3-year trigger’ of 50%, the hub town consents are on target. Elsewhere the percentages were in line with the strategy of the LDP. Applications within the Countryside have reduced to 4.5% from the previous 7% and included applications for conversions and rural exception sites.



Graph 1: Dwellings built during the Plan period.

4.1.4 The Authority is required to ensure that sufficient land is available to provide a 5 year supply of land for housing (PPWales 9.2.3). The delivery of housing has been sufficient to achieve a 5yr+ supply overall during the LDP, indicated by the Pembrokeshire County Council JHLAS¹⁰ and has met the LDP strategy. The 2017 JHLAS indicates a 5.1 year housing supply. There are however early indications that the market is slowing in terms of permissions granted and units built. This has not translated into a shortfall in housing land supply to date.

4.1.5 Strategic housing sites which are located within Hub Towns (Slade Lane North & South and Shoals Hook Lane, Haverfordwest and Maesgwynne, Fishguard) have not been delivered although the Slade Lane and Maesgwynne sites have planning permission. Whilst allocations within rural settlements continue to be developed, there is a need to review all undeveloped housing allocations, including strategic housing sites, to ensure that they are genuinely available for

¹⁰ Supply calculated based on the residual method set out in TAN1 ‘Joint Housing Land Availability Studies’ Jan 2015

development and free from planning, physical and ownership constraints and economically feasible to develop. Housing sites which have been delivered should be removed from the development plan and new sites included. A formal call for candidate sites has been undertaken as part of this process. Approximately 450 candidate sites have been submitted and these will be considered in the context of the LDP2 strategy.

- 4.1.6 It is worth noting that there continue to be constraints to the delivery of some sites affected by lack of capacity within the sewerage system. AMP6, which is the Asset Management Period 6 - 2015-2020) Dŵr Cymru / Welsh Water capital investment programme is key to unlocking constrained sites in many cases, and further information has been provided by Dŵr Cymru / Welsh Water on this. This organisation has also commenced work on AMP 7, which will cover the period from 2020 to 2025.
- 4.1.7 The potential for contextual change may arise from revisions to the Technical Advice Note 20 'Planning and the Welsh Language' published in October 2017. This may influence decisions on strategic development options¹¹ including economic development, the cumulative effects of development on the Welsh language across the plan area, and phasing of development within identified language sensitive areas. A background paper on the Welsh Language has been prepared.
- 4.1.8 Whilst the LDP has delivered an acceptable level of housing development (including affordable housing – Section 4.4) in line with the LDP strategy, the level and distribution of housing at settlements and the countryside should be re-assessed to ensure that it remains the most appropriate way forward in light of potential changes to context, vision and objectives under the LDP review.

4.2 Population and Household Growth

- 4.2.1 The Local Development Plan identified the following key trends for population based on the 2001 Census.

'Pembrokeshire has an ageing population with 19.2% over 65 (whole County) compared to 17.4% in Wales . There is high net out-migration of younger people (16-24 year olds), balanced by high in-migration of people over 45 years old. The population of Pembrokeshire was also forecast to grow during the Plan period. The 2008 Welsh Government population projections for Pembrokeshire excluding the National park suggests that the population would grow from approximately 97,147 in 2001 to 102,626 in 2021, an increase of 5,479.¹²

- 4.2.2 The 2011 Census showed however, that the population of Pembrokeshire excluding the National Park was 99,756. This was marginally higher than previously estimated. The ONS mid-year population estimates (published

¹¹ Para 2.4.2 Technical Advice Note 20: 'Planning and the Welsh language'

¹² PCC LDP [Scale and Location of Growth Background Paper, 2008](#)

2016) indicate that in 2015, Pembrokeshire (excluding the National Park) had a resident population of 100,802 and with the National Park a population of 123,464¹³. Population growth within Pembrokeshire, excluding the National Park, has been less than projected, and at 2015 has fallen short of predictions by some 2,698 persons.

- 4.2.3 Between 2011 and 2016 net migration averaged approximately 390 per year from within the UK and approximately 80 per year from outside the UK between 2012 and 2016¹⁴ ¹⁵. There is an aging population in Pembrokeshire partly as a result of migration and people are living longer. This may affect the demand for housing for older people.
- 4.2.4 Welsh Government local authority population projections for Wales¹⁶ (2014-based) estimate that by 2039 Pembrokeshire will have a population of 122,200 based on assumptions about births, deaths and migration and based on trends in recent years. This is a reduction of 1,500 people (1.2%) with reductions on all age groups apart from those aged 75 and over. The majority of this reduction will take place after the end of the LDP2 plan period. During LDP2 (end date 31 December 2033) the population is anticipated to grow until 2029, to approximately 124,400 (+700) falling by about 100 persons only to 123,600 at 2034. Thus the population of Pembrokeshire is projected to increase then decrease but to finish lower in 2039 than in 2014.
- 4.2.5 Local Authority Household Projections (2014 –based)¹⁷ published by the Welsh Government estimate that the number of households in Pembrokeshire is projected to increase by 4% between 2014 and 2039 rising from an estimated 54,200 households to 56,400, having dropped from 56,700 households in 2029-2034. The average household size is projected to decline from 2.24 (2014) to 2.13 (2034) and 2.11(2039).

“Between 2014 and 2039 the population of Powys Pembrokeshire is projected to fall by around 1,400 (or 1.2 per cent). This is the fifth largest projected fall in Wales. There is projected to be reductions in all age groups apart from those aged 75 or over (which are projected to increase by 24,200). Net migration will account for an increase of 6,300 in the population between 2014 and 2039 (driven by internal migration); however

¹³ <https://statswales.gov.wales/Catalogue/Population-and-Migration/Population/Estimates>

¹⁴ <https://statswales.gov.wales/Catalogue/Population-and-Migration/Migration/Internal/migrationbetweenwalesandrestofuk-by-localauthority-flow-periodofchange>

¹⁵ <https://statswales.gov.wales/Catalogue/Population-and-Migration/Population/Components-of-Change/componentspopulationchange-by-localauthority-component>

¹⁶ <http://gov.wales/docs/statistics/2016/160929-local-authority-population-projections-2014-based-en.pdf>

¹⁷ <http://gov.wales/docs/statistics/2017/170323-household-projections-local-authorities-2014-based-en.pdf>

this is more than offset by a reduction in population due to natural change of 7,700".¹⁸

4.2.6 It is clear that the level of household and population growth should be reconsidered within the review. The Demographics Forecasts Paper¹⁹ published in July 2018, provides population projection figures for the area of Pembrokeshire within the National Park and the area outside (Pembrokeshire-out). It indicates that over the plan period whilst the population is projected to remain fairly stable for Pembrokeshire as a whole, there is expected to be decline within the National Park area and growth in Pembrokeshire-out. For Pembrokeshire-Out, the population aged 65+ is estimated to increase by +7,688 (32%) over the 2017–2033 period, whilst the 0–15 age group is estimated to decline by -442 (-2%). The following table is extracted from the Demographic Forecasts paper.

Table 2: WG 2014-based Population Age Profile (2017 & 2033)

| Age Group | 2017 | | | 2033 | | |
|--------------|------------------|-------------------|---------------|------------------|-------------------|---------------|
| | Pembrokeshire UA | Pembrokeshire Out | PCNP | Pembrokeshire UA | Pembrokeshire Out | PCNP |
| 0–15 | 21,195 | 18,212 | 3,013 | 20,034 | 17,770 | 2,423 |
| 16–64 | 71,417 | 59,224 | 12,169 | 63,985 | 55,066 | 8,971 |
| 65+ | 31,344 | 24,373 | 6,982 | 39,803 | 32,061 | 7,590 |
| TOTAL | 123,957 | 101,810 | 22,165 | 123,822 | 104,898 | 18,983 |

It is noted that the population of Pembrokeshire-Out and PCNP do not sum to Pembrokeshire UA totals. Population sourced directly from StatsWales.

4.3 Housing

4.3.1 The LDP housing requirement was derived from Welsh Government’s 2008-based household projections. The population projections indicated that a total of 5,724 new homes are required from 2011-2021, at an annual rate of 572 per year. As seen in the Population and Household Growth (Section 4.2) a major driver of the housing requirement is the level of population change and household formation. The changing nature of household provision is one aspect of the increasing need for homes. The Authority intends to publish a Growth

¹⁸ <http://gov.wales/docs/statistics/2016/160929-local-authority-population-projections-2014-based-en.pdf>

¹⁹ Demographic Forecasts Paper July 2018 <https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base>

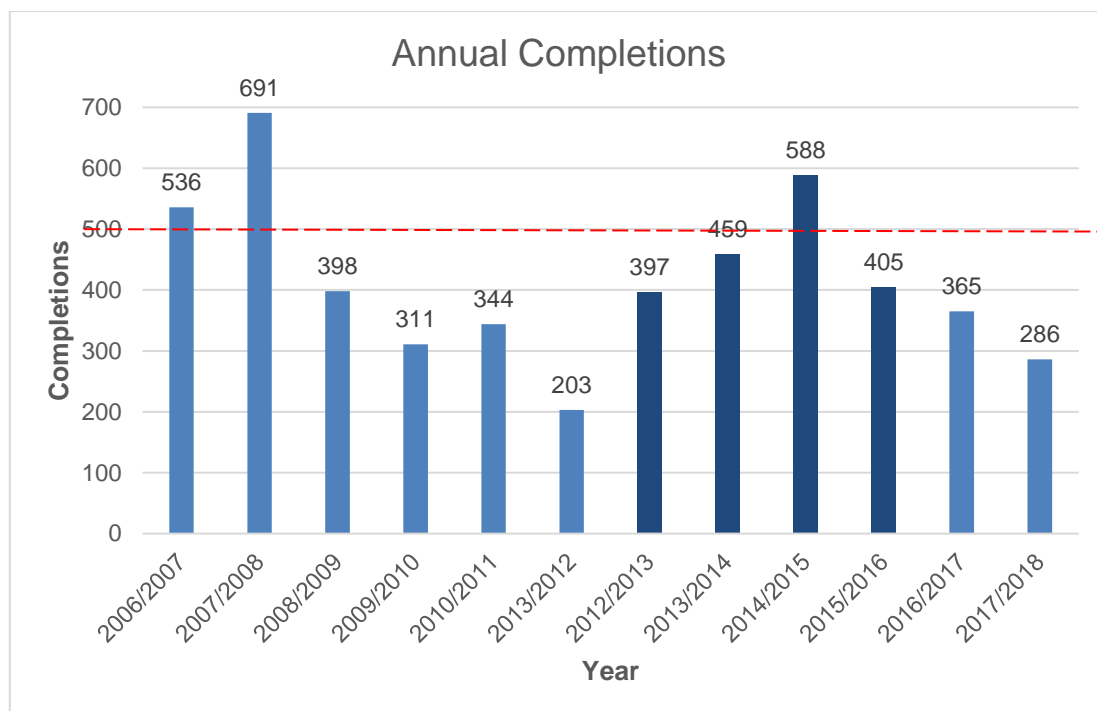
options paper to support the Preferred Strategy of the Plan which will take into account historic rates of development, projections and other considerations²⁰.



Graph 2: Housing Land Supply between 2007 and 2016

4.3.2 Work on the 2014 and 2015 JHLAS together with current work has identified a number of sites where programmed improvements to Waste Water Treatment Works will increase the 5 year land supply of the Authority, together with additional development sites, excluded from the 5 year land bank because of developer uncertainty, that are ready to progress in response to demand. The Authority currently (2017 JHLAS) has a 5.1 year land supply and is therefore meeting the target set by the Plan and the requirements of National Planning Policy. The 2018 JHLAS has yet to be published.

²⁰ Planning Policy Wales Edition 9, paragraph 9.2.2



Graph 3: Dwelling Completions between April 2007 and April 2016

- 4.3.3 As of 31st March 2018 2,103 out of the anticipated 5,724 dwellings required by the strategy had been delivered. Whilst this represents a significant number of dwellings, the level of delivery is below that which is required of the strategy for five out of the six years. This is illustrated through Graph 3 above, which shows that the requirement of delivering 572 dwellings per annum has only been met during one year of the LDP plan period.
- 4.3.4 The highest level of completions was reached in 2015 with 588 dwellings delivered. This figure exceeded the annual requirement. The economic downturn has had a significant effect on the delivery of dwellings over recent years. Currently there is only one national house builder active in the County (Persimmon) and housing development in Pembrokeshire remains heavily reliant on many builders who focus on developing smaller sites. This has enabled housing completions to remain relatively stable despite economic uncertainty.
- 4.3.5 The Joint Housing Land Availability Study 2016 (JHLAS) confirmed the relatively high number of units remaining in Category 4 (3078 units) and comprising land where development is unlikely within 5 years by virtue of major physical constraints or other constraints as agreed by the JHLAS study group. The 2017 JHLAS records the Category 4 figure as having fallen to 2,735, whilst Category 1 & 2 has risen to 3,464²¹. Despite the constraints identified on

²¹ Category as set out in Technical Advice Note 1 Joint Housing Land Availability Studies, 4.4.2

specific sites, the Council has only failed to achieve a 5 year land supply for the year the plan was adopted – 4.93 in 2013.

4.4 Affordable Housing

4.4.1 The Local Development Plan has sought to maximise the delivery of affordable housing, particularly in rural areas to help sustain communities. A need for nearly 3,000 affordable homes was identified within the Pembrokeshire Affordable Housing Delivery Statement 2007-2011²², and over 2,150 people identified as being in need of affordable housing at March 2015. The LDP sought to achieve affordable housing provision of 98 dwellings per year and 15% of the permitted and completed dwellings. The level of affordable housing achieved has exceeded these levels each year since adoption. In total 897 affordable homes have gained planning permission of 4,370 homes providing an average of 20.5%. Built rates achieved 22% of completions. The numbers of homes and affordable homes built and permitted continue to meet targets set. However, given the continuing high levels of need for affordable housing, it may be appropriate to revisit the affordable housing policies of the LDP whilst ensuring the viability and deliverability of development. House price monitoring indicates that there is no need to adjust affordable housing contribution targets. Since adoption contributions received under policy 'GN.3 Infrastructure and New Development' have achieved £738k towards affordable housing. Over £5million has been contributed towards other purposes identified in Policy GN.3.

4.5 Employment

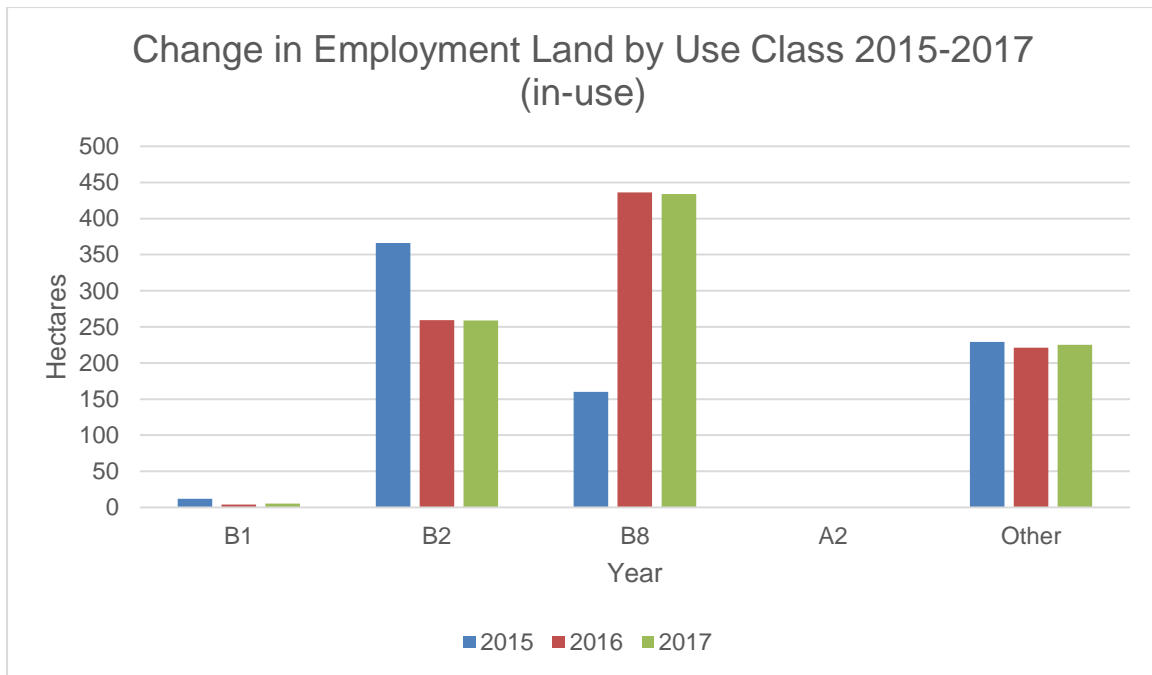
4.5.1 The Wales Spatial Plan Update 2008 identifies as a strategic priority an aim to develop a more diverse and entrepreneurial knowledge based economy and identifies both energy and the environment as being critical to achieving success in this area. To support the potential for growth in port and energy / renewable energy technologies, land is allocated and criteria based policies included within the Plan. The LDP allocates 97.55 ha of strategic employment land (see para 2.5.1), 77.8 ha of employment land, and 11.42 ha of mixed use allocations.

4.5.2 Whilst there has been reasonable progress on implementation of the local employment allocations of policy GN.5 this varies considerably on a site-by-site basis. Less successful have been the three mixed use allocations of policy

²² Published jointly by Pembrokeshire County Council and Pembrokeshire Coast National Park Authority and largely based on the Common Housing Register.

GN.7, none of which has been implemented (although one has an extant mixed use employment / housing permission).

- 4.5.3 Pembrokeshire contains significant energy related developments of national importance, particularly around the Haven. The closure or expansion of these employment sites can have a significant impact on the availability of employment land within the Council's jurisdiction. Additionally, throughout the Plan area small and medium sized enterprises are of importance.
- 4.5.4 Land identified for employment purposes (permitted, allocated or built) in 2013 was 1137.37 ha, outside the National Park. By 2017 it increased to 1200 ha. In 2017, 984 ha was actively in use as employment land. A total of 192.5 ha was recorded as being vacant (including buildings) in 2013, and this was recorded as 216 ha in 2017. There was an 18% vacancy level in 2017, however its geographical distribution varies considerably. There are significant changes in use of land on existing sites on a year by year basis, as parts of them cease to be used or come back into use. Overall provision of general industrial sites and take up is good in general, but there may need to be adjustments to allocations in some locations in conjunction with preparation of LDP2. Provision of serviced units remains a challenge, as funding to build new units is hard to secure and without this, development may be unviable.
- 4.5.5 In general, vacancy levels are higher at the Haven, reflecting both the need to provide a range of opportunities, and the effect that use or vacancy of single large sites of land or buildings can have on year-by-year vacancy rates. Neyland and Narberth maintain low vacancy rates. The distribution of employment land and its take up will be reviewed to ensure that sites remain deliverable and appropriate in relation to any revision to the plan strategy, changing context through revised Planning Policy Wales, designation of the Haven Waterway Enterprise Zone in 2013 (see paragraph 4.5.9 below) and regional working including the Swansea Bay City Region projects in Pembrokeshire.
- 4.5.6 Appendix 3 identifies whether LDP employment Allocations, including employment sites are being delivered.



Graph 4: Change in Employment Land by Use Class 2015-2017 (in-use)

4.5.7 The dominance of B2, B8 and other uses is a reflection of the major industrial sites at the Milford Haven Waterway. The Milford Haven Refinery site (Murco) came back into use as a storage facility (for Puma Energy) in 2016 and explains the increase in B8 area between 2015 and 2016.

4.5.8 The scale and distribution of employment sites will be revisited to ensure fully developed sites are no longer allocated (however, activity on such sites will continue to be monitored). Allocation of mixed use sites has not proved successful and they will be reconsidered in the light of the continuing need to provide choice in employment opportunities and to consider alternative use options on sites no longer needed for employment purposes.

4.5.9 The Haven Waterway Enterprise Zone was designated in 2013. Whilst the extent of the Enterprise Zone is spatially defined, it is a fiscal policy without any related planning dispensations. There are incentives for companies to expand or newly locate within the Enterprise Zone and this should be recognised within the review.

4.6 Climate Change Impact

4.6.10 Planning Policy Wales Edition 9 (at 4.5.3) sets out the impacts that Wales can expect from climate change. Climate change is expected to include -

- Increase in winter rainfall and in the frequency of intense rainfall
- Rising sea levels

- More extreme weather such as severe storms

4.6.11 Climate change is expected to have a range of impacts, including an increase in flash flooding due to heavy rain and an increase in river and coastal flooding and erosion. Planning Policy Wales (4.5.5) confirms that these impacts present risks to people, property, infrastructure and resources and a fundamental challenge to how we plan the development and the use of land and provision of environmental infrastructure in Wales. There is a need to plan for these impacts, reducing the vulnerability of our natural environment and built environment to climate change. Planning for climate change must be carried out in a way that is consistent with sustainability principles.

4.6.12 Whilst there are limited areas of Pembrokeshire County Council's planning jurisdiction which are at the coast, there is a need to consider the impact of climate change on coastal communities and elsewhere where flooding is expected to occur and where mitigation cannot address the impact. The Authority will publish a background paper which considers the implications of climate change and flood risk and sets out a preferred way forward to help inform the review of the LDP.

4.6.13 The Welsh Government have also recently published a consultation draft of the Welsh National Marine Plan. The consultation closed on the 29 March 2018. Its implications for the LDP review are still being assessed, and will be taken into account during the review of the LDP when the National Marine Plan is published.

5. Local Development Plan General Policies

5.1 Introduction

5.1.1 Local Development Plan General Policies have been reviewed against the findings of the Annual Monitoring Reports, significant contextual changes and changes to national policy and legislation. A summary of whether policies are working well is set out at Appendix 4. It includes an indication of whether changes are likely to be necessary taking into account the above considerations, and responses received from key stakeholders. Those policies requiring change because they are not delivering the requirements of the plan strategy, or due to significant contextual change are considered below.

5.2 Policy GN.1 General Development Policy

5.2.2 Policy GN.1 provides a framework for evaluation of potential development impacts and provides a mechanism to ensure that all development is appropriate for the immediate location and its wider setting and context. Implementation of this policy as monitored through the AMRs has highlighted concerns over criterion 3. All proposals having an adverse effect on landscape character, quality and diversity are considered contrary to this policy. This approach does not adequately address the potential for impact to be minimal or minor and environmentally acceptable. A review of this policy is required to address the potential for unacceptable impact. A revised policy GN.1 will be published within the draft Preferred Strategy.

5.3 Renewable Energy

5.3.1 The 'A prosperous Wales' Well-being²³ goal seeks an innovative, productive and low carbon society. PPWales supports a transition to a low carbon society and requires Local Planning Authorities to consider the contribution that their areas can make to its delivery, including suitable development plan policies. Letters to local authorities from the Minister for Natural Resources, December 2015 and March 2016 set out Welsh Government requirements in relation to a revised Renewable Energy Toolkit for Planners to identify policies for renewable energy developments including, where appropriate, the identification of sites for renewable energy, local strategies and / or spatial allocations. The Authority published a LDP Renewable Energy Assessment in April 2017. This forms part of the evidence base for LDP2 and provides a basis for considering whether the LDP's current approach to Renewable Energy requires any adjustments. Policy GN.4 will be re-drafted to reflect the current context.

²³ Well-being of Future Generations (Wales) Act 2015

5.4 Retail

5.4.1 The Authority commissioned a County Wide Retail Study (2010) to establish convenience and comparison retail floorspace requirements over the lifetime of LDP1. Both convenience and comparison floorspace were estimated to be required by 2021 to support existing retail provision. Allocations for retail development were included within the plan to meet the retailing 'need' identified.

GN.13 Retail Allocations

The following sites are allocated for retail development:

| Site Reference | Site Name | Use | Area (ha) |
|----------------|--|---|-----------|
| RT/040/01 | Fred Rees Site, Haverfordwest | Comparison units | 0.31 |
| RT/096/01 | St Govan's Centre, Pembroke Dock | Mix of comparison and convenience units | 0.23 |
| RT/034/01 | The Old Primary School Site, Fishguard | Convenience - Foodstore | 1.34 |
| RT/088/01 | The Old Primary School Site, Narberth | Mix of comparison and convenience units | 0.41 |
| RT/050/01 | Kingsmoor foodstore allocation, Kilgetty | Convenience - Foodstore | 2.86 |

5.4.2 Whilst St Govan's Centre is in existing retail use, the remaining retail allocations have not come forward during the plan period to date, however a number of alternative retail developments have come forward elsewhere. A revised retail capacity study was considered appropriate to establish whether existing or further retail allocations are appropriate within the review of the Plan and looking forward to 2036. The Capacity Study was carried out in 2016 and published February 2017 and in summary demonstrates that there is no convenience need and reduced comparison need over the LDP2 plan period. The retail allocations within the Local Development Plan should be reviewed to account for this change in evidence base and to consider whether further or alternative allocations are required.

5.4.3 Planning Policy Wales and Technical Advice Note 4 both titled 'Retail and Commercial Development', have been revised and re-issued by Welsh Government (November 2016) and the retail strategy of the Plan requires amendment to reflect changes to guidance in light of this, economic downturn

experienced by some town centres, recent and emerging Town Centre Masterplans / Regeneration Strategies.

5.5 Tourism

5.5.1 The AMRs demonstrate that the policies of the Local Development Plan for tourism proposals are working well in respect of proposals coming forward. Within AMR5 (1 April 2017 to 31 March 2018) 10 planning proposals were approved relating to the visitor economy, with 2 being contrary to policy but justified by other material considerations. There is a changing context for tourist accommodation with increased popularity of lodges, yurts, shepherds huts and glamping which the LDP policies successfully accommodate. The Authority is progressing a Landscape Character Assessment for the area outside of the National Park and will, as part of this work, consider the capacity of the landscape to accommodate tourism development to inform the review of the Plan. A review of the tourism strategy will be required.

5.6 Minerals

5.6.1 Welsh Government's Minerals Planning Policy Wales (2001) was incorporated into Chapter 14 of Planning Policy Wales (PPW) in 2016. Various Minerals Technical Advice Notes (MTANs) remain alongside PPW Chapter 14.

5.6.2 The Regional Technical Statement for Aggregates 1st Review for South Wales and North Wales was published in August 2014. It is due for further review during 2019.

5.6.3 The Regional Technical Statement for Minerals 1st Review establishes a regional approach for future provision of sand and gravel in SW Wales. This requires collaboration of the former Dyfed authorities, accepting that the Pembrokeshire Coast National Park is unlikely to be the location of new production sites. National Park Authorities are not required to maintain a minerals landbank, although there may be production within their boundaries.

5.6.4 The regional apportionment for Pembrokeshire, Ceredigion and Carmarthenshire for land won sand and gravel is 0.33 million tonnes per year, until the end of the plan period and for 7 years thereafter. For crushed rock aggregates it is 1.09 million tonnes per year until the end of the plan period and 10 years thereafter. The Regional Technical Statement says that *'unless new permissions have been granted since December 2010 to address the resulting sand and gravel shortfall, new allocations totalling at least 2.94 million tonnes will need to be identified within the LDPs of one or more of the four authorities over which the apportionment is shared'*.

- 5.6.5 The current LDP did not allocate new site(s) for terrestrial sand and gravel production because of the uncertainty over whether they would be technically or financially viable to quarry during the Plan period. An industry view would help inform the review of the Plan.
- 5.6.6 For Crushed Rock, there are adequate alternative sites to those in the National Park and the landbank available at the conclusion of the current LDP's Plan period (2021) will be more than sufficient to meet Welsh Government's expectations. In this instance, the apportionment continues to relate to individual authority areas rather than to a larger region.
- 5.6.7 The Regional Technical Statement for Aggregates, 1st Review, advises that all existing and potential new wharves and railheads should be identified for safeguarding within the LDP, in order to provide for a full range of sustainable transport options (whether or not they are currently utilised).
- 5.6.8 Mineral working within the Council's planning area is presented in Appendix 2 of the current LDP. This table will need to be updated for the Replacement LDP, the most up-to-date basis for which is at present the South Wales Regional Aggregates Working Party Annual Report for 2016 (published in March 2018). This can be further updated with reference to minerals consents granted since 2014 and will form part of the review of minerals.

5.7 Gypsy and Traveller

- 5.7.1 The Gypsy and Traveller Accommodation Assessment (GTAA) that informed the adopted LDP was produced in 2010 and identified a need for 40 additional pitches to 2015. Allocations were made to meet this need at Catshole Quarry (Monkton) and Kingsmoor Common Kilgetty to accommodate 23 pitches. There was no identified need for transit pitches over the same period. This need was not met by 2015. The assessment of Gypsy and Traveller accommodation needs, and the duty to make provision for sites where the assessment identifies need, became statutory requirements under the Housing (Wales) Act 2014. The Council has produced an updated GTAA (2015) which has found that there is a reduced need for pitches – 32 residential pitches, plus two Travelling Showpeople's yards are required between 2015 and 2020 - a lower need than previously indicated. The unmet need over the period up to the end of 2031 for the pending PCNPA and PCC Plans is projected to be 101 pitches, plus the two aforementioned yards.
- 5.7.2 The findings of the 2015 GTAA identify the need for additional accommodation. The need has been grouped into geographic areas. These are Haverfordwest, Pembroke / Pembroke Dock and Kilgetty where there are existing sites and access to local services. (see GTAA). The inclusion of a criteria based policy within the Local Development Plan has also enabled a significant number of

private pitches to be developed. Although a significant amount of the 2015-2020 GTAA need has been met by the end of 2018, an early review of the GTAA is anticipated to establish the need to the end of the Plan period.

5.8 Community Facilities

5.8.1 The adopted LDP allocated a range of community facilities within Policy GN.33 'Community Facilities'. This policy also allows proposals for new facilities, or the loss of existing facilities to be considered under a criteria based approach. The allocations of Policy 33 have generally not come forward (see Appendix 3) with the exception of Withybush hospital extension where the land has been used as car parking in conjunction with other developments at the hospital and land transfer has taken place at Slade Lane in support of the allocation for a school. An assessment will be required to consider whether remaining allocations are still required and whether these or alternative/new community facilities should be allocated. There is also a need to reconsider which developments and land uses should fall within the scope of this policy.

5.9 Open Space

5.9.1 An Open Space Assessment was undertaken in 2010. The assessment focused on 57 settlements identified in the Local Development Plan. A total of 336 open spaces were identified and divided into formal recreation, informal recreation, equipped play areas, amenity open space, and education land (education land is not counted within the standards). A revised Open Space Assessment will take account of latest Fields in Trust standards.

5.9.2 Overall, there is an oversupply of open space across the Authority's settlements but it is not evenly distributed across settlements and 30 of the 57 settlements did not meet the Fields in Trust Standard. Shortfalls were identified for many of the types of open space against the Fields in Trust 2.4 hectare standard²⁴ within urban and rural settlements, particularly for equipped play space in urban areas and playing pitches and outdoor sport space in rural settlements.

5.9.3 The LDP AMRs do not indicate that the loss of open space is an issue, and there was an overall gain of 3.47 ha of open space, sport and recreational space.²⁵ The influence of the Well-being goal for a healthier Wales will be a consideration in the LDP review and for policies GN.33 Community Facilities, GN.34 Protection and Creation of Outdoor Recreation Areas and GN.35

²⁴ Formerly the National Playing Fields Association 6 acre standard for open space provision per 1000 population. <http://www.fieldsintrust.org/guidance>

²⁵ '15/0947/PA for affordable housing at Queen Street, Pembroke Dock resulted in the loss of 0.07 ha of amenity open space. The provision of affordable housing at this location demonstrated compliance with GN.35 'Protection of Open Spaces with Amenity Value'.

Protection of Open Space with Amenity Value and the Planning Obligations Supplementary Planning Guidance.

- 5.9.4 A Green Infrastructure Study was commissioned by the Authority (jointly with Pembrokeshire Coast National Park Authority) to identify the existing green infrastructure resource, opportunities to develop green infrastructure links and to extend the green network. The study, published by the Authority in June 2018, includes the towns of Fishguard and Goodwick, Narberth, Pembroke, Haverfordwest, Pembroke Dock, Milford Haven, Neyland; (and St David's, Newport, Tenby and Saundersfoot within the National Park). It will form part of the evidence base of the Authority and will influence policy.

5.10 Green Wedge

- 5.10.1 Planning Policy Wales requires that Green Wedges be reviewed as part of the Local Development Plan review process (paragraph 4.8.1). Policy GN.36 'Green Wedges' appears to be working well, with a single application at Lower Town Fishguard²⁶ being permitted in contravention to Policy GN.36. There are no concerns over the implementation of the policy. The review of green wedges will consider whether designated areas should be retained or amended and whether new areas are required and may result in changes to the spatial application of the policy.

5.11 Historic Environment

- 5.11.1 The annual monitoring of historic environment policy (GN.38 Protection and Enhancement of the Historic Environment) has identified an issue with the wording of policy GN.38. The wording requires that even where a limited adverse effect is identified, a proposal must be considered to be contrary to the policy. Consideration will be given to the re-wording of the policy during the review to ensure that an appropriate balance of issues is achieved in the consideration of any proposal. In addition, there has been limited contextual change, including the revision of Conservation Area boundaries at Fishguard and Goodwick, the introduction of Article 4(2) Directions at Lower town Fishguard and Goodwick. There is the potential for further amendments to Conservation Area boundaries the display of which should be updated as part of the LDP review. The Historic Environment (Wales) Act 2016 will also be taken into account.

²⁶ 16/0420/PA for COU from general storage to domestic garden, shed and greenhouse and restoration of lime kiln

5.12 Transport

5.12.1 Four authorities in South West Wales have worked collaboratively to produce a Joint Transport Plan (2015-2020), which has replaced an earlier Regional Transport Plan. The authorities are Pembrokeshire, Carmarthenshire, Neath Port Talbot and Swansea, which aligns with the Swansea Bay City Region. It will provide the framework for improving transport connectivity and access to, from and within the region for the period 2015 - 2020. The priority transport schemes for Pembrokeshire identified in the Joint Transport Plan will be a considered within the review, along with any further schemes that have emerged since its publication and any schemes which have been partially or fully delivered since LDP adoption and which no longer need to be shown.²⁷

5.13 Waste

5.13.1 Planning Policy Wales and Technical Advice Note 21 'Waste' advise that development plans should demonstrate how national waste policy, and in particular the CIM (Collections, Infrastructure and Market) Sector Plan, along with any updated position adopted in the Waste Planning Monitoring Reports and any other form of waste management priorities relevant to its local area have been taken into account. TAN21 advises further waste assessment work is unnecessary at the regional level (or local development plan) as the CIM Sector Plan provides a strategic starting point. Continuing regional collaboration will help inform monitoring, and an appropriate network of waste disposal and recovery facilities. Two Waste Planning Monitoring Reports for SW Wales (including Pembrokeshire) have been published by Welsh Government. There is a need to revisit this issue within the LDP review, to ensure that adequate provision for waste management is made in the Plan area, either through criteria-based policies, allocations or a mixture of both. Certain types of waste management and treatment facility may be procured on a regional basis in the future.

5.14 Proposals Map

5.14.1 The LDP Proposals Map shows policies, proposals and allocations with a spatial component. The LDP1 Proposals Map shows a number of designations which are determined by mechanisms outside the LDP process. These designations do not need to be shown on the Proposals Map (see the Local Development Plan Manual Edition 2 August 2015, page 16). It advises that these designations may be shown on a constraints map, including spatial delineations for Technical Advice Note (TAN) 15 'Development and Flood Risk',

²⁷

https://pembrokeshire.gov.uk/content.asp?nav=101,100&parent_directory_id=646&id=31891&d1=0

and statutory landscape designations e.g. AONBs. The constraints map can be amended outside of the LDP process to take account of changes. Whilst the constraints map is not a statutory requirement and not part of the LDP, the LDP should reference it, make its status clear and list the designations it includes. Stakeholder views will be important in deciding whether a constraints map would provide additional clarity and whether it should form part of the review.

6. Sustainability Appraisal

- 6.1.1 A review of the SA scoping and assessment framework is required (LDP manual 10.3).
- 6.1.2 The review of plans, policies and programmes and collating of baseline data informing the LDP were undertaken in 2008 and a scoping report published incorporating consultation comments in January 2009. Throughout LDP1 preparation the review of plans, policies and programmes was updated accordingly to reflect any changes or updates at the various stages of plan preparation. Policies were assessed against the SA objectives and shaped by the SA throughout plan production.
- 6.1.3 The Annual Monitoring Reports (AMR1-5) of the Local Development Plan monitor the performance of the plan against the sustainability appraisal objectives. AMR 3/4 advises that the main effects of the plan are positive when measured against the SA objectives. Some monitoring issues were identified in the LDP AMR and these areas may need to be addressed in a more sustainable manner in LDP2. This includes the policy areas: town centres, gypsy traveller pitch provision, minerals, and housing (including the housing land supply). Indicators for population, water quality (including the outcome of the Nitrate Vulnerable Zone designation) employment and economy will also need to be considered in LDP2.
- 6.1.4 Previous SA monitoring of LDP1 has raised no significant issues which warranted further action other than those highlighted previously, however this is in relation to the SA indicators rather than LDP triggers.
- 6.1.5 The plan will be subject to further Habitats Regulations Appraisal and this will take place iteratively throughout plan review, including at Preferred Strategy stage.
- 6.1.6 In line with the LDP Manual (Section 3.4.2), LDP2 will be subject to SA requirements and the original methodology has been found to be most appropriate. The SA framework remains relevant and the SA objectives have been reviewed and the SA Objective on biodiversity was updated to take account of the Environment (Wales) Act 2016. While the previous SA assessment framework is still appropriate and previous monitoring reports have not raised significant issues with the SA framework, the SA has been

reviewed to take account of legislative changes and to ensure the SA and LDP2 have regard to the Pembrokeshire Well-being Plan produced to meet the Well-being of Future Generations (Wales) Act 2015 requirements. A scoping report is the first stage in the process and stakeholder consultation was undertaken on this.

6.1.7 The SA has been reviewed for LDP2, including an update of the plans, policies and programmes and relevant implications will be identified and integrated into the plan. The Preferred Strategy, published alongside the Review Report has been subject to an SA which will form part of the Pre-Deposit consultation documents.

7. Joint Working and Joint Plans

7.1.1 The Planning (Wales) Act 2015 gives Welsh Ministers the power to direct local authorities to prepare joint local development plans. This power does not extend to National Park Authorities. There remains an element of uncertainty around local government reorganisation and regional working.

7.1.2 The Pembrokeshire Coast National Park Authority review report states –

“Welsh Government has requested that the review discuss the potential for preparing a joint plan with Pembrokeshire County Council. The functional linkages and interdependencies of the communities in the National Park area and in the Council’s planning area need to be summarised and concluded.

The two Authorities worked closely to prepare joint evidence, as appropriate, including joint work on Statements of Common Ground at Pembrokeshire Coast National Park Local Development Plan Deposit and on Submission, to demonstrate the compatibility between the Pembrokeshire Coast National Park Local Development Plan and the emerging policies then taking shape for the County Council’s Local Development Plan.

Any move to joint plan preparation would require a fundamental reassessment of both strategies, with considerably more work and supporting evidence required than is otherwise anticipated for individual Plan review. For the Council, an early and unnecessary review of the Plan would incur considerable unnecessary additional cost (additional staff resource) and at the same time would result in unhelpful uncertainty for decision making on planning applications during plan preparation, with the prospect of facing a further early review on Local Government Reorganisation.

Given this background, the two Authorities will continue further joint working on an evidence base to support implementation and review of both Authorities Plans.”

- 7.1.3 The two authorities have and will continue to work closely to prepare joint evidence, as appropriate, including joint work on Statements of Common Ground, to demonstrate compatibility between Plans at appropriate stages.
- 7.1.4 The County Council will continue to explore and demonstrate its joint working with the National Park Authority and other Authorities, including Ceredigion County Council and Carmarthenshire County Council. The Regional Retail Study commissioned jointly with Pembrokeshire Coast National Park Authority and Ceredigion County Council provides an example of collaboration in the production of regional evidence for LDP purposes. Joint work with neighbouring authorities will continue. There is however considerable variation in review timetables for Carmarthenshire, Ceredigion and Pembrokeshire County Councils. Carmarthenshire County Council adopted its LDP in December 2014, and is required to commence review to ensure that a replacement plan is in place when their plan expires in 2021, whilst Ceredigion adopted its Local Development Plan in 2013. The most effective use of resources is likely to be focused on joint working around cross boundary issues and key areas of evidence. This will continue to include Minerals and Waste. Joint working on a Regional Employment Study and a Regional Local Housing Market Assessment has commenced, as has a joint Strategic Flood Consequences Assessment in partnership with Carmarthenshire County Council. Preparation of a joint LDP with neighbouring authorities whilst a long term possibility would require a significant amount of pre-planning as well as the introduction of appropriate governance arrangements.

8. Conclusion

- 8.1.1 Whilst the preceding AMRs indicate that in general, the LDP policies are being effective, contextual change and statutory requirements indicate that a full review of the LDP is required. Several policy and allocations within the Plan require amendment to reflect contextual and evidence based changes. There has also been a requirement to revisit the vision, objectives and strategy in light of Well-being requirements and stakeholder views and the Preferred Strategy is published for consultation alongside this Review Report.
- 8.1.2 Elements of the Development Strategy are currently not being delivered and should be revisited. The distribution and scale of growth also require reconsideration in order to establish the most appropriate approach to ensure delivery.
- 8.1.3 Contextual and policy changes, include anticipated publication of
- revised Planning Policy Wales, Edition 10,
 - the Welsh National Marine Plan,

- the National Development Framework,
- revisions to the Local Development Plan Manual 2, and
- potential changes forming part of the Review of Use Classes and Permitted Development.

Wherever feasible, these will be addressed during the Review of the Plan.

8.1.3 A full revision procedure will be followed in preparing a replacement LDP.

Appendices

Appendix 1: Report Preparation

The preparation for this report included

1. Review of the key Evidence Base including background papers to the LDP
2. Seminars with Members and other stakeholders on the AMRs
3. Contextual changes including National Planning Policy and legislative changes
4. Consideration of the AMR reports 1, 2, 3 and 4 for the Authority LDP.
AMR 4 has been prepared but is unpublished at the time of this report.

Engagement of stakeholders to date

| Who | When |
|--|--|
| PCC Members | Presentation of SW Wales Regional Retail Capacity Study Members Seminar 10 Feb 2017 Members Seminar 'Are the policies working?' 8 March 2017 Members Planning Briefing (including Local Development Plan) 31 May / 14 June 2017 Seminar – feedback on consultations 22 Jan 2018 Members Seminar on Issues, Objectives and Vision 23 April 2018 Seminar on Levels of Growth and Spatial Strategy options 16/7/18 |
| PCC officers | Meeting to discuss whether the plan policies are working 23/2/17 with Development Management Officers Stakeholder Seminar Issues Objectives and Vision 26 April 2018 Seminar on Levels of Growth and Spatial Strategy options 19/7/18 |
| <i>Stakeholders</i> | Key Stakeholders workshop – Issues, Objectives and Vision 26 April 2018 Seminar on Levels of Growth and Spatial Strategy options 19/7/18 |
| <i>Town and Community Councils</i> | Engagement Sessions 6/12/18, 13/12/18 18/7/18, 24/7/18 (day and evening sessions) |
| <i>Gypsy and Traveller Working group (GTAA Steering Group)</i> | 5/10/17, 5/6/18, 17/9/18 |
| <i>Tourism Working group</i> | |
| <i>Affordable Housing Working group</i> | |
| Pembrokeshire Agents Forum | AMR feedback seminars 21/9/15, 27/9/16, 3/10/17. Plus forums on 13/2/18, 22/5/18. |

| | |
|---|---|
| Carmarthenshire County Council & Ceredigion County Council, South West Wales region authorities, Powys CC | Discussion with officers with specific regional topic responsibility e.g. Minerals (Regional discussion on joint working for Welsh Language evidence 15/5/18 Regional working and procurement of SFCA for PCC and Carms CC areas) Regional Employment Study Regional LHMA |
| Key Stakeholder Meetings | Dŵr Cymru 16/1/18 NRW 4/12/18 |
| Pembrokeshire Coast National Park Authority | Joint Officer Meetings Nov 2016, Sept 2017, January 2018, 19 June 2018, 23 October 2018 |
| AMRs (see AMRs 1,2,3 & 4 Sections 5 Feedback from Consultation Events) | Stakeholder feedback Members 25/9/14, 14/9/15, 20/9/16 (26/9/17) Stakeholders 26/9/14, 22/9/15, 21/9/16 (19/9/17) AMR5 will be published for stakeholder feedback and reported to Cabinet. This approach is considered appropriate whilst the LDP is under review. |

Appendix 2: Annual Monitoring Report Performance Summary

The summary below refers to the performance of AMR5 which is the most recently prepared AMR and covers 1 April 2017 to 31 March 2018.

Performance

| | |
|--|--------|
| Policy targets are being achieved | GREEN |
| Policy targets are not being achieved but there are no concerns about the implementation of the policy | YELLOW |
| Policy targets are not being achieved and this raises concerns about the implementation of the policy | RED |
| No target or trigger is identified within the monitoring framework | N/A |

| LDP Indicator | Target | Trigger | Outcome |
|---|--|---|--------------------------|
| (Core) Amount of development (by TAN 15 paragraph 5.1 development category) permitted in C1 & C2 floodplain areas & otherwise not meeting all the TAN 15 tests (paragraph 6.21 – v).* | Development in zones C1 & C2 is in line with the provisions of TAN 15 | More than 1 approval within 1 year of development in zones C1 & C2 contrary to the provisions of TAN 15. | GREEN |
| Strategic Objective: Improving access to goods & services (I) | | | |
| Number & proportion of housing planning permissions at different levels of the settlement hierarchy. | 60% of permissions are in the Hub Towns | Permissions less than 50% in Hub Towns over a period of 3 years. | YELLOW |
| Area of land safeguarded for transport related proposals lost to development. | 0% | Any loss will require investigation | GREEN |
| Net change in provision of community facilities as a consequence of planning permission (area & type). | To maintain key facilities | Loss of over 3 community facilities within any 3 year period. | YELLOW (net loss 0.13Ha) |
| Level of services within rural settlements. | Services in settlements within the settlement hierarchy are not significantly lower than in the 2008 Rural Facilities Survey | Monitor at Plan Review (2017) – a 10% change in number of settlements achieving service village level would require further investigation | GREEN |
| (Core) The capacity (MW) of renewable energy developments permitted. | No target but one may be set for LDP monitoring purposes, using the methodology set out | No trigger identified. | N/A |

| LDP Indicator | Target | Trigger | Outcome |
|---|--|--|---------|
| | in WG Renewable Energy Toolkit | | |
| Amount of open space (m2) permitted in relation to overall number of dwellings permitted. | Provision of public open space at a rate of more than 25% below the standard requirement (as set out in SPG) | Provision of public open space at a rate of more than 35% below the standard requirement (as set out in SPG) at Plan Review. | RED |
| Strategic Objective: Building on the County's strategic location for energy & port-related development (E) | | | |
| Planning permission granted for employment development on allocated sites within identified port areas (Blackbridge, Milford Haven, Goodwick former Dewhurst factory site & Goodwick Parrog). | 100% by end of Plan period | 50% without planning permission at Plan Review (2017). Annual narrative to describe progress towards delivery. | RED |
| Progress towards delivery of safeguarded transport schemes. | All delivered by 2021 | If finance not been secured for a project by Plan Review (2017) | YELLOW |
| Strategic Objective: Supporting the development of the distinctive role of Pembrokeshire's towns, especially within the Haven Hub (F) & Regenerating town centres & Sustaining & enhancing the rural & urban economy (G) | | | |
| Number of applications approved contrary to policies SP 4, SP 14, GN.12, GN.14 | 0 | More than 4 planning applications approved contrary to a single policy over 4 years. | GREEN |
| (Core) Amount of major retail, office & leisure development (sq m) permitted in town centres expressed as a percentage of all major development permitted. (TAN 4)* | 100% (figure to exclude schemes which are allocated sites outside town centres) | 90% of target | YELLOW |
| 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). | 0% | Narrative on any schemes not permitted under Policy GN.15 or GN.10. | YELLOW |
| Progress towards delivery of Retail allocations. | 100% delivered by end of Plan period. | Any allocations which have not gained planning permission by Plan Review (2017) | RED |
| Change of presence of A1 uses (unit numbers & | At least 66% of the linear frontage is A1 | Less than target. | RED |

| LDP Indicator | Target | Trigger | Outcome |
|---|---|---|---|
| floorspace) in primary retail frontages. | use class within primary frontages | | |
| Percentage of ground floor vacant units in each Town Centre (within identified LDP boundary). | Vacancy levels are no higher than the national (UK) average | Vacancy levels 5% higher than national (UK) average. | RED |
| Strategic Objective : Developing quality visitor economy founded on a distinct sense of place & an outstanding natural & build environment (H) | | | |
| Number of applications approved contrary to policies SP5, GN.16 & GN.17, GN.18 & GN.19 (including at appeal). | No applications approved contrary to policies | More than 4 approvals in 4 years. | YELLOW (2 apps under GN.19) |
| Summary of Strategic Objective Developing quality visitor economy founded on a distinct sense of place and an outstanding natural and built environment (H) | | | |
| Strategic Objective: Sustaining & enhancing the rural & urban economy (C) | | | |
| (Core) New employment land developed (ha/sq m). New employment land developed for offices (ha/sq m) New employment land developed for industry & warehousing (ha/sq m). | 100 ha developed by 2021 | Less than 45 ha developed by 2017. | GREEN |
| Area of land permitted on non-allocated sites (ha / sq m). | 10% of total employment land permitted. | 50% below target. | GREEN |
| Progress towards delivery of strategic employment sites a) Blackbridge b) Pembrokeshire Science and Business Park c) Withybush Business Park d) Trecwn | 75% delivered by 2021. | Development not commenced by the following dates a) Blackbridge (2018) b) Pembrokeshire Science and Business Park (March 2017) c) Withybush Business Park (march 2017) d) Trecwn (March 2017) | Blackbridge YELLOW Science and Business Park GREEN Withybush YELLOW Trecwn RED |
| Progress towards delivery of mixed use sites: a) Haverfordwest – Old Hakin Road b) Johnston Arnold's Yard | 66% delivered by 2021 | Sites do not have planning permission by Plan Review (2017). | Haverfordwest GREEN Johnston RED Hubberston |

| LDP Indicator | Target | Trigger | Outcome |
|---|--|---|-----------------------|
| c) Dale Road Hubberston | | | RED |
| (Core) 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 required as identified in the Regional Technical Statement. | Maintenance of the hard rock & sand & gravel land-banks for the duration of the Plan (to 2021) & for 10 years (hard rock) & 7 years (sand & gravel) beyond the Plan period | Further investigation if land bank drops to 12 years (hard rock) or 9 years (sand & gravel), to ensure sufficient provision at end of Plan period. Monitor tonnage permitted. | RED (sand and gravel) |
| Number of applications approved contrary to Policy GN.22. <i>(Please note this is an amended indicator as proposed by AMR 1, paragraph 3.17).</i> | 0 | More than 4 approvals in 4 years. | GREEN |
| Progress towards fulfilling the commitment to find alternative locations for minerals production in non-National Park locations within Pembrokeshire & / or elsewhere in SW Wales. | Regional discussions to resume by 2014 and significant progress towards identification of new mineral reserves in the County &/or SW Wales region demonstrated by 2018 | No trigger, but narrative to update the position. | N/A |
| Strategic Objective: Developing vibrant communities providing a range & mix of homes & local services (D) (See also indicators for Sustaining & enhancing the rural & urban economy) | | | |
| (Core) Housing land supply (TAN 1) | Minimum 5 years housing land supply | Supply less than 5.5 years. | GREEN |
| Annual dwelling completions & commitments. | Average of 500 new completed dwellings per year over first 4 year period. Average of 640 new completed dwellings per year in remaining years | 10% below target. | YELLOW |
| (Core) Amount of housing development permitted & built on allocated housing sites as a percentage of the total housing allocation & as a percentage of the total housing development permitted. | 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 | 30% of allocations should be permitted by March 2017. Investigation if permissions on allocated sites are below 60% of total. | GREEN |

| LDP Indicator | Target | Trigger | Outcome |
|---|--|--|----------------------------|
| Progress towards delivery on the following housing sites: a) Slade Lane South, Haverfordwest b) Slade Lane North, Haverfordwest c) Maesgwynne, Fishguard Shoals Hook Lane | All sites should deliver identified units anticipated in the Plan by 2021 | 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. | Slade Lane South YELLOW |
| | | | Slade Lane North YELLOW |
| | | | Maesgwynne YELLOW |
| | | | Shoals Hook Lane RED |
| Affordable Housing percentage target in GN.27 | Target will reflect economic circumstances | 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 & may conduct additional viability testing & modify the targets established in GN.27 & GN.28 | GREEN |
| (Core) The number of net additional affordable & general market dwellings built (TAN 2) | 5,700 dwellings by 2021 including 980 affordable housing dwellings by 2021 | If total number of dwellings built by Plan Review (2017) is less than 50% of target. | YELLOW 37% |
| Total number of affordable homes granted planning permission. | 980 by 2021 | If less than 50% of target by Plan Review (2017). | GREEN 106 % |
| Number of affordable homes gaining planning permission through planning obligations. | 476 by 2021 | If less than 50% of target by Plan Review (2017). | GREEN |
| Number of affordable homes permitted as Exception sites. | 40 by 2021 | If less than 20 by Plan Review (2017). | GREEN |
| Number of affordable homes permitted delivered by Registered Social Landlords. | 401 by 2021 | Investigation if less than 200 by Plan Review (2017). | GREEN |
| Number of rural workers dwellings granted planning permission | 40 by 2021 | 50% of target. | YELLOW |
| Indication of general level of Affordable Housing Need. | No significant increases annually. | Level of need varies by over 10% in comparison with 2012 level as measured by the | GREEN |

| LDP Indicator | Target | Trigger | Outcome |
|--|---|---|-----------------------------|
| | | Common Housing Register. | |
| Number of affordable dwellings with planning permission & number built as a percentage of all new housing with planning permission & built. | 98 affordable dwellings per annum consented; affordable housing to be at least 15% of overall permission & completion. | Further investigation if affordable housing is less than 12.5% of overall permissions. | GREEN |
| Proportion of housing development fulfilling affordable housing contributions sought by the authority. | 75% of development to meet or exceed contribution rate; 95% of development to make some form of contribution to affordable housing. | 10% on targets. | GREEN |
| (Core) Average density of housing permitted on allocated sites. | 30 dph in Hub Towns & 25 dph in Rural settlements. | Further investigation if less than 25dph in urban areas & less than 20dph in rural areas. | Hub towns GREEN |
| | | | Rural Settlements YELLOW |
| Average density of housing permitted on windfall sites. | 30 dph in Hub Towns & 25 dph in Rural settlements. | Further investigation if less than 25dph in urban areas & less than 20dph in rural areas. | Hub towns GREEN |
| | | | Rural Settlements GREEN |
| Number of sites & pitches permitted & completed for gypsies & travellers accommodation. | 40 additional Gypsy Traveller pitches are provided by the end of 2015. | Less than 40 permitted by the end of 2015. | YELLOW |
| Progress towards take up of allocated sites for gypsies & travellers accommodation. | 40 additional Gypsy Traveller pitches are provided by the end of 2015. | Less than 40 permitted by the end of 2015. | YELLOW |
| 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). | Need identified in 2014 survey met by the end of 2019. | Identified need not met by 2019 | N/A |
| Meeting newly arising (2016) need by the end of 2021 Level of need identified within Gypsy Traveller Accommodation Needs Assessment (produced end of 2016) | Need identified in 2016 survey met by the end of 2021. | No trigger. | N/A |

| LDP Indicator | Target | Trigger | Outcome |
|--|------------------|---|---------|
| Number of applications approved contrary to the protective aim of Policy GN.33. | 0 | 3 over 3 years. | GREEN |
| Strategic Objective: Delivering design excellence & environmental quality (B) & Protecting & enhancing the natural & built environment (J) | | | |
| Number of planning permissions granted contrary to Policy GN.1, the protective aim of criterion 3. | 0 | More than 4 such permissions in 4 years. | GREEN |
| Number of housing permissions within Settlement Boundaries as a percentage of all housing permissions. | 98% | 5% a year outside settlement boundaries over 4 years. | YELLOW |
| Number of permissions approved contrary to Policy SP16. | 0 | More than 4 in 4 years. | YELLOW |
| (Core) Amount of Greenfield land lost to development (ha) which is not allocated in the Plan. | None (No target) | None (No trigger) | YELLOW |
| Amount of Greenfield lost to development outside settlement boundaries. | None (No target) | None (No trigger) | YELLOW |
| Loss of Open Space as a result of development (ha) which is not allocated in the Plan. | None (No target) | None (No trigger) | GREEN |
| Number of planning permissions granted contrary to the aim of Policy GN.37. | None | More than 4 in 4 years. | GREEN |
| Number of planning permissions, listed building consents & SAM consents granted contrary to Policy GN.38. | None | More than 4 in 4 years. | YELLOW |
| (Core) Amount of new development (ha) permitted on previously developed land (brownfield, redevelopment & conversions) expressed as a percentage of all development permitted. | No target | No trigger | N/A |
| (Core) Amount of waste management capacity permitted | No target | No trigger | N/A |

| LDP Indicator | Target | Trigger | Outcome |
|--|--------------------------------|---|----------------|
| Progress towards finding a new Civic Amenity Site to serve SE Pembrokeshire. | Provision of new site by 2015. | No planning permission in place by April 2014 & if site is not operational by 2015. | GREEN |
| Winsel – Provision of extension to civic amenity site | Scheme implemented | No planning permission in place by April 2014 & if site is not operational by 2015. | GREEN |

Appendix 3: Delivery of LDP Allocations

Base Date 1 April 2018

The delivery of sites within Pembrokeshire has, and continues to be, restrained by insufficient capacity within existing sewerage infrastructure to accommodate the allocations of the LDP. The status below identifies where this is a factor in the deliverability of allocations and is generalised within the statement 'infrastructure constraints'.

| Allocation / Site Ref | Site name | Units / site area | Status |
|---|--|-------------------|---|
| SP3 Employment Land Requirements | | Ha | |
| S/EMP/086/LDP/01 | Blackbridge, Milford Haven | 33.45 | Planning application refused by Welsh Ministers (DNS). A resubmission is anticipated. |
| S/EMP/096/00001 | Pembrokeshire Science and Technology Park, Pembroke Dock | 22.38 | Site has been partially delivered. |
| S/EMP/040/00001 | Withybush Business Park, Haverfordwest | 20.61 | Site has been partially delivered. |
| S/EMP/136/0001 | Trecwn | 21.11 | Consent granted on part of site prior to LDP adoption but not implemented. No planning application received since LDP adoption. |
| GN.5 Employment Allocations | | Ha | |
| EMP/040/00003 | Merlins Bridge Creamery Extension | 5.13 | Site partially delivered. |
| EMP/040/00005 | Withybush North of Business Park | 6.09 | Site partially delivered. |
| EMP/040/00004 and /040/00009 | Withybush East of Business Park | 15.38 | Site partially delivered. |
| EMP/086/00001 | Haven Head Business Park Northern Extension, Milford Haven | 3.82 | A small part of the site is in use for renewable energy. |
| EMP/086/LDP/01 | Adjacent to Marble Hall Road, Milford Haven | 6.86 | No planning application received. |
| EMP/086/LDP/02 | Milford Haven Gas Storage Site | 0.68 | Site partially delivered. |
| EMP/093/00001 | North of Honeyborough Industrial Estate | 8.55 | Planning consent not implemented |
| EMP/034/LDP/01 | Goodwick - Former Dewhirst Factory | 0.99 | No application for employment use. Substantial part of this site has permission for housing which is not implemented. |

| Allocation / Site Ref | Site name | Units / site area | Status |
|-----------------------------------|---|--------------------------|---|
| EMP/034/LDP/02 | Goodwick - Parrog | 0.6 | No planning application received. |
| EMP/030/00001 | Crymych - adjacent to Riverlea / opposite Llygad-yr-Haul | 5.2 | Site partially delivered. |
| EMP/034/00006 | Celtic Link Business Park, near Sceddau | 13.47 | Site partially delivered. |
| EMP/132/00001 | A4115, Templeton | 2.88 | Employment consent not implemented |
| EMP/053/00001 | Old Station Yard, Letterston | 1.23 | Site partially delivered. |
| EMP/000/LDP/01 | Carew Airfield | 5.6 | Site partially delivered. |
| EMP/088/LDP/01 | Rushacre Enterprise Park Extension | 1.32 | Site partially delivered. |
| GN.7 Mixed use Allocations | | Ha | |
| MXU/040/01 | Haverfordwest - Old Hakin Road | 1.31 | Mixed use (employment / housing) permission not implemented. |
| MXU/048/01 | Johnston - Arnold's Yard | 5.47 | No planning application received. |
| MXU/086/01 | Dale Road, Hubberston | 4.64 | No planning application received. |
| GN.13 Retail Allocations | | Ha | |
| RT/040/01 | Fred Rees Site, Haverfordwest (Comparison units) | 0.31 | Planning application submitted. Awaiting further information from applicants. |
| RT/096/01 | St Govan's Centre, Pembroke Dock (Mix of comparison and convenience units) | 0.23 | Site has planning permission for alterations. No application regarding mix of units. |
| RT/034/01 | The Old Primary School Site, Fishguard (Convenience Foodstore). | 1.34 | Lapsed consents not implemented. Chimney's Link Masterplan phase 1 and phase 2 are approved. Further phases to include retail / commercial development. |
| RT/088/01 | The Old Primary School Site, Narberth (Mix of comparison and convenience units) | 0.41 | Planning consent not implemented. Site options to be reconsidered following a community based group being selected as the preferred developer for the site. |
| RT/050/01 | Kingsmoor foodstore allocation, Kilgetty (Convenience – Foodstore) | 2.86 | Planning permission lapsed June 2016. |
| GN.21 Marinas | | | |
| MAR/096/LDP/01 | Martello Quays, Pembroke Dock | - | Planning permission lapsed. No current proposals. |

| Allocation / Site Ref | Site name | Units / site area | Status |
|----------------------------------|---|--------------------|--|
| MAR/034/LDP/01 | Fishguard Harbour | - | Outline permission and first reserved matters consent issued. Developers have confirmed they do not intend to proceed with the proposal. |
| GN.27 Housing Allocations | | No of Units | |
| HSG/040/00269 | Haverfordwest - Hermitage Farm | 38 | Site delivered. |
| HSG/040/00273 | Haverfordwest - Slade Lane North | 48 (459*) | Site(s) has outline planning permission. Time extension for submission of reserved matters granted 2017. |
| HSG/040/00274 | Haverfordwest - Slade Lane South | 512 | |
| HSG/040/00275 | Haverfordwest – between Shoals Hook Lane and bypass | 277 | No planning application received. |
| HSG/040/00106 | Haverfordwest - Scarrowscant / Glenover | 140 | Site part delivered. Remainder has had planning permission. |
| HSG/086/00223 | Milford Haven - Steynton Thornton Road | 224 | Approx. half the site has planning permission for 117 units. Development has commenced |
| HSG/086/00129 | Milford Haven - Steynton Beaconing Field | 149 | Planning permission has lapsed. |
| HSG/086/00095 | Milford Haven - Hubberston West of Silverstream | 50 | No planning application received. |
| HSG/086/00222 | Milford Haven - South West of The Meads | 93 | Outline consent will lapse 2017. Current Sec.73 application undetermined. |
| HSG/086/00318 | Milford Haven - Castle Pill | 72 | Planning permission has lapsed.. |
| HSG/086/00117 HSG/086/00225 | Milford Haven - Hubberston Adjacent to Kings Function Centre, Dale Rd | 151 | Site Delivered. |
| HSG/093/00066 | Neyland - East of Poppy Drive | 101 | No planning application received. |
| HSG/096/00238 | Pembroke Dock - North of Pembroke Road | 98 | No planning application received. Infrastructure constraints. |
| HSG/096/00231 | Pembroke Dock - North of Imble Lane | 96 | Site Delivered. |
| HSG/096/00233 | Pembroke Dock - East of Hill Farm, Imble lane | 63 | No planning application received. Infrastructure constraints. |

| Allocation / Site Ref | Site name | Units / site area | Status |
|-----------------------|--|-------------------|---|
| HSG/095/00154 | Pembroke - North & West of Railway Tunnel | 150 | Under construction – due to be complete by 2022. |
| HSG/095/00153 | Pembroke - Adjacent to Monkton Swifts | 118 | No planning application received. |
| HSG/095/00147 | Pembroke - Adjacent to Long Mains & Monkton Priory | 115 | Reserved matters planning consent has been implemented. ²⁸ |
| HSG/095/00144 | Pembroke - North of Gibbas Way | 70 | No planning application received. |
| HSG/095/00144 | Pembroke - South of Gibbas Way | 58 | Site under construction. |
| HSG/034/00215 | Fishguard - Maesgwynne Farm | 399 | Site has planning permission – time extension for submission of Reserved Matters granted 2016. |
| HSG/034/00165 | Fishguard -East of Maesgwynne | 24 | Site delivered. |
| HSG/034/LDP/01 | Fishguard - Old Infants School | 21 | Planning permission has lapsed. |
| HSG/088/00078 | Narberth - West of Bloomfield Gardens | 89 | Site has planning permission. |
| HSG/088/00077 | Narberth - West of Rushacre | 58 | Site under construction. |
| HSG/048/00038 | Johnston - Adjacent to Milford Road (includes land off A477) | 130 | Application not approved for the main site. Infrastructure constraints. Part developed for housing and offices. |
| HSG/053/00009 | Letterston - Court Meadow | 90 | Initial phase developed. Planning permission for 2 nd phase lapsed May 2016. |
| HSG/030/00043 | Crymych - Between the School & Station Road | 60 | No planning application received. Infrastructure constraints |
| HSG/030/LDP/01 | Crymych - East of Waunaeron | 35 | No planning application received. Infrastructure constraints. |
| HSG/050/00042 | Kilgetty - Extension to James Park & Cotswold Gardens | 75 | Most of site has planning permission. Phase 1 under construction. |
| HSG/050/00043 | Kilgetty - Land to the Rear of Newton Hall | 26 | No planning application received. Infrastructure constraints. |
| HSG/050/00041 | Kilgetty - Land West of Stepside School | 19 | Site has planning permission. |
| HSG/050/00044 | Kilgetty - Land to the South of Kivelgy Park | 20 | No planning application received. |

²⁸ 30 affordable housing units have already been completed at this site. Reserved Matters planning permission 13/0377/PA of outline planning permission 04/0780/PA.

| Allocation / Site Ref | Site name | Units / site area | Status |
|------------------------------|--|--------------------------|---|
| HSG/003/00024 | Begelly - North of New Road | 65 | Site has planning permission. Infrastructure constraints. |
| HSG/006/00003 | Blaenffos - Adjacent to Hafod | 10 | No planning application received. |
| HSG/007/LDP/01 | Boncath - North of Cilfan y Coed | 10 | Section 106 to be issued prior to submission of reserved matters application. |
| HSG/008/LDP/01 | Broadmoor - Northwest of Lyndhurst Avenue | 12 | No planning application received. Infrastructure constraints. |
| HSG/020/00062 | Cilgerran - Adjacent to Holly Lodge | 24 | Site under construction. |
| HSG/022/00012 | Clarbeston Road - West of Ash Grove | 21 | Approx. half the site has planning permission and is under construction. |
| HSG/152/LDP/01 | Clunderwen - Depot Site | 28 | Site has planning permission. |
| HSG/025/00028 | Coshaston - South of Tinkers Fold | 6 | Planning permission subject to Sec 106 Agreement being signed??. |
| HSG/028/00012 | Croesgoch - OS 7445, North of the Forge | 20 | Site has planning permission. Infrastructure constraints. |
| HSG/028/00013 | Croesgoch - East of the Forge | 22 | No planning application received. |
| HSG/029/00014 | Crundale - Opposite Woodholm Close | 13 | Site under construction. |
| HSG/029/00017 | Crundale - Land at Cardigan Slade | 55 | Site under construction. |
| HSG/033/00035 | Eglwysrwrw - South West of the School | 15 | No current planning permission. |
| HSG/041/LDP/01 | Hayscastle Cross - Land Opposite Barrowgate | 6 | No planning application received. |
| HSG/044/00050 | Hook - Rear of Pill Road | 15 | Site under construction. |
| HSG/045/00008 | Houghton - Nursery | 15 | Site has authorised start. |
| HSG/046/00015 | Hundleton - East of Bentlass Road | 31 | Site under construction. |
| HSG/047/LDP/01 | Jeffreyston - Rear of Beggars Roost & Sunny Side | 18 | No planning application received. |
| HSG/052/00011 | Lamphey - South of Cleggars Park | 55 | No planning application received. |
| HSG/060/LDP/01 | Llandissilio - Pwll Quarry Cross | 25 | No planning application received. |

| Allocation / Site Ref | Site name | Units / site area | Status |
|------------------------------|---|--------------------------|--|
| HSG/057/LDP/01 | Llanddewi Velfrey - North of the Village Hall | 12 | Development has commenced. |
| HSG/063/00024 | Llangwm - Opposite The Kilns | 25 (75*) | No planning application received. Infrastructure constraints. |
| HSG/081/LDP/01 | Maenclochog - North West of the Globe Inn | 30 (58*) | Small part of site has planning permission. Infrastructure constraints. |
| HSG/085/LDP/01 | Mathry - South of the Woodturner's | 6 | No planning application received. |
| HSG/097/LDP/01 | Penally - North of The Paddock | 8 | Site has planning permission. |
| HSG/097/LDP/02 | Penally - Penally Heights | 11 | Site under construction. |
| HSG/099/LDP/01 | Pentlepoir - Land adjacent to Coppins Lodge | 35 | Site under construction. |
| HSG/108/LDP/01 | Puncheston - Opposite Bro Dewi | 6 | No planning application received. |
| HSG/108/LDP/02 | Puncheston - West of Awelfa | 12 | No planning application received. |
| HSG/113/LDP/01 | Robeston Wathen - South of Robeston Court | 14 | No planning application received. |
| HSG/114/LDP/01 | Roch - East of Pilgrim's Way | 44 | No planning application received. |
| HSG/116/LDP/01 | Rosemarket - Opposite The Glades | 13 | No planning application received. |
| HSG/015/00022 | Sageston - South of the Plough Inn | 31 | Site under construction. |
| HSG/119/LDP/01 | Simpson Cross - East of Hill Lane | 11 | Site has planning permission for 11 units. |
| HSG/120/00018 | Spittal - North West of Wesley Way | 22 | Majority of site has planning permission. Permission has been implemented. |
| HSG/122/00035 | St Dogmaels - Awel y Mor Extension | 16 | No planning application received. |
| HSG/123/LDP/01 | St. Florence - North of Parsons Green | 26 | One third of site has planning permission. |
| HSG/132/00030 | Templeton - South of the B4315 | 18 | Site delivered. |
| HSG/132/LDP/01 | Templeton - South of the Boars Head Junction | 28 | No planning application received. |
| HSG/135/00004 | Tiers Cross - North of Bulford Road | 23 | No planning application received. |
| HSG/149/LDP/01 | Wolfscastle – opposite Haul y fryn | 30 | No planning application received. Infrastructure constraints. |

| Allocation / Site Ref | Site name | Units / site area | Status |
|---|--|-------------------|---|
| GN.30 Specialist and Supported Accommodation | | | |
| | | Ha | |
| SSA/89/01 | Park House, New Hedges | 1.65 | Outline consent not implemented |
| GN.31 Gypsy Traveller Sites and Pitches Allocation | | | |
| | | No./Ha | |
| GT/095/001 | Catshole (Castle) Quarry | 8/0.39 | Site delivered for a reduced number of pitches |
| GT/050/001 | Kingsmoor Common, Kilgetty | 15/0.78 | Planning permission granted for 12 pitches. |
| GN.33 Community Facilities | | | |
| | | Ha | |
| CF/040/01 New Primary School | Slade Lane School site, Haverfordwest CF/040/01 New Primary School | 5.83 | Land transfer for the school has taken place. |
| CF/040/02 Hospital Extension | Withybush Hospital Extension, Haverfordwest | 2.57 | Consent granted for car parking on part of the site required in conjunction with development proposals elsewhere at the hospital. |
| CF/040/03 site extension | St Mark's VA School, Haverfordwest | 0.72 | No planning application received. |
| CF/096/01 Site extension and New Access for School | Pennar CP School, Pembroke Dock | 1.4 | No planning application received. |
| CF/095/01 Cemetery Extension | Monkton Cemetery, Monkton | 0.21 | No planning application received. |
| CF/048/01 Cemetery Extension | Popehill, Johnston | 0.77 | No planning application received. |
| CF/035/01 Cemetery Extension | Freystrop Cemetery, Freystrop | 0.21 | Planning consent granted for a cemetery extension in 2010 but implemented. |
| GN.39 Transport Routes and Improvements | | | |
| 1 | A.40 Llanddewi Velfrey to Penblewin | - | Welsh Government Scheme, expected to start in spring 2019. |
| 2 | Improvement to the A.40 west of St. Clears | - | No immediate prospect of further improvements, excepting the A.40 Llanddewi Velfrey to Penblewin scheme (see above). |
| 3 | Northern Distributor Network – Bulford Road link (Johnston to Tiers Cross) | - | Completed scheme July 2015. |
| 4 | Pembroke Community Regeneration Project Phase 1 (Bridgend | - | Now considered to be a medium to long term scheme, for delivery between 2020 and 2030. |

| Allocation / Site Ref | Site name | Units / site area | Status |
|-----------------------|---|-------------------|--|
| | Terrace diversion) & Phase 2 (Western Bypass) | | Updated assessments and design work required. |
| 5 | Blackbridge Access Improvement & Waterston Bypass | - | A DNS planning application for a biomass energy scheme was refused by Welsh Ministers. An access study has been commissioned by PCC. |
| 6 | Southern Strategic Route – A.477 Nash Fingerpost to Energy Site corridor enhancement. | - | Multi-element scheme, with most parts now implemented. Greenhill / Glenside re-alignment completed in 2015, with the Maidenwells bypass completed 2017 |
| 7 | Fishguard (bus focal point) | - | Likely to form an element of wider proposals for town centre regeneration now being taken forward and including a bus focal point as part of the Chimney's Link scheme as part of town centre access improvements. |
| 8 | Fishguard & Goodwick Railway Station (bus/rail interchange) (not mentioned in the JTP, however consideration of an inter-modal freight transfer station here has been mooted) | - | Station re-opened in 2012. There may be other proposals at this site awaiting implementation. Inter-modal freight transfer station idea not progressed. Increased car parking, sustainable transport improvements and commercial use of the station building have taken place. . |
| 9 | Milford Haven (bus/rail interchange) | - | Timing for implementation uncertain. |
| 10 | Pembroke Dock (bus/rail interchange) | - | Phases 1 and 2 of the scheme implemented, further phase to be delivered. |
| 11 | Clunderwen Railway Station improvement | - | Access improvements completed in 2013. |
| 12 | Tenby Park & Ride Scheme (possibly with implications for non-National Park locations) | - | A Tenby Park and Ride Scheme operates seasonally within the National Park. Further proposals may come forward, but timing is uncertain. |
| 13 | B.4318 Gumfreston to Tenby Diversion & Improvement, Phase 3 | - | Automatic flood warning and information signs have been installed (2016) instead of a complex road improvement. |

| Allocation / Site Ref | Site name | Units / site area | Status |
|---|---|-------------------|--|
| 14 | B.4320 Monkton re-alignment | - | Now considered to be a medium to long term scheme, for delivery between 2020 and 2030. |
| 15 | A.40 High Street to A.487 West Street ('Chimneys' link), Fishguard | - | Likely to form an element of wider proposals for town centre regeneration now being taken forward. |
| 16 | Haverfordwest to Narberth Shared Use Path | - | Progress is dependent on access being granted through Slebech Park. Feasibility study and funding bid commenced. |
| 17 | Haverfordwest Sustainable Town Centre Project | - | Timing is now uncertain. |
| These Schemes are not safeguarded by the LDP – but included in LDP AMRs as a post-adoption proposal | Haverfordwest Master Plan (some aspects of this scheme previously formed part of the Haverfordwest Sustainable Town Centre Project) | - | The Churnworks Junction Improvement is complete, other elements are complete, underway or are planned. The Haverfordwest Masterplan 2016 (a separate initiative with the same title) may result in revisions to schemes and priorities here. |
| | North-west shared use path link into Haverfordwest (Pelcomb Bridge to Pelcomb Cross & Simpson Cross to Roch). | - | Delivery expected by 2020. |
| | Completion of the cycle route from Milford Haven to Johnston & to St. Ishmaels & Dale. | - | Some elements of this scheme were delivered in conjunction with the Bulford Road link (Johnston to Tiers Cross). Delivery of other aspects is expected by 2020. |
| | Fishguard to Llanychaer shared use path. | - | A feasibility study has been undertaken. Delivery uncertain due to land constraints |
| | Fishguard to Letterston shared use path (phase 2). | - | Delivery expected by 2020. |
| | Pembroke Dock to Milton shared use path. | - | Being implemented, most sections now completed. |
| | Fishguard Harbour Development. | - | Delivery expected by 2020. |
| | Haverfordwest Airport Extension. | - | Delivery expected by 2020. |

| Allocation / Site Ref | Site name | Units / site area | Status |
|--|--|-------------------|---|
| | Northern Distributor Network – phase 2 (to improve access and connectivity towards the South Hook and Waterston areas) | - | Intended to complement the recently completed Bulford Road link Delivery isn't expected until after 2020. |
| | Haverfordwest Northern Bypass | - | This scheme was not supported by the 2018 Welsh Government Haverfordwest Congestion Study and is unlikely to progress. |
| | Cardi-Bach Community Links – walking & cycling | - | Aspirational scheme with delivery not expected until after 2020. |
| | Fishguard to Letterston shared use path (phase 3) | - | Aspirational scheme, with delivery not expected until after 2020. |
| | Letterston to Maenclochog shared use path | - | Aspirational scheme, with delivery not expected until after 2020. |
| | Freystrop to Hook & Llangwm shared use path | - | Aspirational scheme, with delivery not expected until after 2020. |
| GN.40 New Waste Management Facilities Ha | | | |
| Extension to the existing Civic Amenity site | | | |
| WST/LDP/040/01 | Winsel near Merlin's Bridge | 4.95 | Extension to site delivered. |
| New in-building handling and treatment of waste | | | |
| EMP/040/00004 and 040/00009 | Withybush East of Business Park (undeveloped residual) | 15.38 | These are employment and energy sites which have the potential to also host in-building facilities for the handling and treatment of waste. Delivery of employment or energy proposals has already taken place, although some vacant land may remain within their boundaries. The exception is at Trecwn, where previous activities have ceased |
| EMP/040/00005 | Withybush North of Business Park | 6.09 | |
| EMP/040/00003 | Merlins Bridge Creamery and extension site | 7.63 | |
| EMP/000/00003 | Milford Haven Refinery (Murco), Milford Haven | 123.7 | |
| EMP/000/00004 | Petro Plus / Dragon LNG | 177.2 | |
| EMP/086/00003 | Thornton Industrial Estate | 22.07 | |
| EMP/146/00001 | Waterston Industrial Estate | 9.48 | |

| Allocation / Site Ref | Site name | Units / site area | Status |
|------------------------------|-------------------------------------|--------------------------|--|
| EMP/095/00001 | Pembroke Power Station site | 195.1 | but extant buildings are being maintained. |
| EMP/096/00005 | Kingswood, Pembroke Dock | 8.39 | |
| EMP/096/00006 | Waterloo, Pembroke Dock | 19.67 | |
| EMP/000/00002 | Valero Refinery, Rhoscrowther | 215.3 | |
| EMP/034/00006 | Celtic Link Business Park, Scleddau | 13.47 | |
| S/EMP/136/00001 | Trecwn | 21.11 | |

Appendix 4 : Summary of Policy Effectiveness²⁹

Further amendments may be necessary as part of plan revision, including revisions as a result of changes to National Policy and stakeholder feedback. Minor amendments may include potential consequential changes following amendments to other policies within the Plan.

The effectiveness of policy and the potential changes are considered against the Soundness Tests set out in Planning Policy Wales Chapter 2 of Edition 9 (2.7.2), and further detail provided by Local Development Plan Manual Edition 2 August 2015.

| Policy Number | Policy Name | Comment | Test of Soundness addressed by this change |
|------------------|-------------------------------------|---|--|
| Strategic Policy | Policy Name | | |
| SP 1 | Sustainable Development | Review – contextual change | 1: Does it have regard to Well-being Goals? |
| SP 2 | Port and Energy Related Development | Functioning Effectively – some minor amendment may be required | - |
| SP 3 | Employment Land Requirements | Revise –some employment allocations delivered and review of undelivered sites required. | 3: Will development be delivered? 3: Will development be viable? |
| SP 4 | Promoting Retail Developments | Effective – may need some minor amendment | - |
| SP 5 | Visitor Economy | Effective – minor amendments may be required | - |
| SP 6 | Minerals | Effective – minor amendments may be required | - |
| SP 7 | Housing Requirement | Review as part of the reconsideration of the development strategy | 2: Is it supported by robust, proportionate and credible evidence? 2: Does it seek to meet assessed needs and contribute to the achievement of sustainable development? |
| SP 8 | Affordable Housing Target | Review as part of the reconsideration of the development strategy | 2: Is it supported by robust, proportionate and credible evidence? |

²⁹ Effectiveness is judged against the findings of the AMRs and consultation with stakeholders.

| Policy Number | Policy Name | Comment | Test of Soundness addressed by this change |
|----------------|--|---|---|
| | | | 2: Does it seek to meet assessed needs and contribute to the achievement of sustainable development? |
| SP 9 | Welsh Language | Effective – may require minor amendment and contextual update | 2: is it locally specific? |
| SP 10 | Transport Infrastructure and Accessibility | Effective –amendment may be required to consider stakeholder feedback | 2: is it locally specific? |
| SP 11 | Waste | Revise to reflect contextual change and to consider stakeholder feedback | 1: is it consistent with regional plans, strategies and utility programmes? |
| SP 12 | The Settlement Hierarchy | Revise to reflect contextual change and to consider stakeholder feedback | 1: Does it reflect the Single Integrated Plan? (<i>Well-being Plan</i>) 2: Can the rationale behind plan policies be demonstrated? |
| SP 13 | Settlement Boundaries | Revise to reflect development strategy and to consider stakeholder feedback | 2: Does it seek to meet assessed needs and contribute to the achievement of sustainable development? |
| SP 14 | Hub Towns | Revise to reflect development strategy | 1: Does it give regard to national policy and WSP? |
| SP 15 | Rural Settlements | Revise to reflect development strategy | 2: Does it seek to meet assessed needs and contribute to the achievement of sustainable development? |
| SP 16 | The Countryside | Revise to reflect contextual change and to consider stakeholder feedback | 1: Does it have regard to national policy and WSP? |
| General Policy | Policy Name | | |
| GN.1 | General Development Policy | Revise to address criterion 3 - further minor amendment may be | 2: Can the rationale behind plan policies be demonstrated? |

| Policy Number | Policy Name | Comment | Test of Soundness addressed by this change |
|---------------|---|---|--|
| | | required and to consider stakeholder feedback | |
| GN.2 | Sustainable Design | To consider stakeholder feedback | 1: Does it have regard to Well-being Goals? |
| GN.3 | Infrastructure and New Development | Effective – minor amendment may be required | - |
| GN.4 | Resource Efficiency and Renewable and Low-carbon Energy Proposals | Review - minor amendment may be required | 1: Does it have regard to national policy and WSP? 3: Will it be effective? |
| GN.5 | Employment Allocations | Revise –some employment allocations delivered and review of undelivered sites required. | 3: Can the sites allocated be delivered? |
| GN.6 | Employment Proposals | Effective however minor amendment required and to consider stakeholder feedback | 1: is it consistent with regional plans, strategies and utility programmes? |
| GN.7 | Mixed-Use Allocations | Review - site delivery and to consider stakeholder feedback | 3: Can the sites allocated be delivered? |
| GN.8 | Protection of Employment Sites and Buildings | Effective – minor amendment may be required | - |
| GN.9 | Extensions to Employment Sites | Effective – minor amendment may be required | - |
| GN.10 | Farm Diversification | Effective – minor amendment may be required and to consider stakeholder feedback | 1: Does it have regard to national policy and WSP? |
| GN.11 | Conversion or Change of Use of Agricultural Buildings | Effective - Revise to reflect contextual change and to consider stakeholder feedback | 1: Does it have regard to national policy and WSP? 2: Will it be effective |
| GN.12 | Town Centre Development | Review as part of the reconsideration of the retail strategy and to consider stakeholder feedback | 1: Does it have regard to national policy and WSP? 2: Is it supported by robust, proportionate and credible evidence? |

| Policy Number | Policy Name | Comment | Test of Soundness addressed by this change |
|---------------|---|--|--|
| GN.13 | Retail Allocations | Review as part of updated retail strategy | 1: Does it have regard to national policy and WSP? |
| GN.14 | Major Out-of-Town Centre Development | Effective policy – minor amendments may be required | - |
| GN.15 | Small Scale Retail | Revise to reflect contextual change | 1: Does it have regard to national policy and WSP? |
| GN.16 | Visitor Attractions and Leisure Facilities | To consider stakeholder feedback | 2: Is it supported by robust, proportionate and credible evidence? |
| GN.17 | Self-Catering and Serviced Accommodation | Generally effective - amendment may be required to consider stakeholder feedback | 2: Will it be effective? |
| GN.18 | Touring Caravan and Tent Sites | Review as part of an updated tourism strategy and to consider stakeholder feedback | 2: Is it locally specific? |
| GN.19 | Static Caravan Sites | Review as part of an updated tourism strategy and to consider stakeholder feedback | 2: Is it locally specific? |
| GN.20 | Site Facilities on Existing Caravan and Camping Sites | Review as part of an updated tourism strategy | 2: Is it locally specific? |
| GN.21 | Marinas | To consider stakeholder feedback | 2: Is it locally specific? |
| GN.22 | Prior Extraction of the Mineral Resource | Effective – minor amendment may be required | - |
| GN.23 | Minerals Working | Effective – minor amendment may be required | - |
| GN.24 | Recycled Waste Materials and Secondary Aggregates | To consider stakeholder feedback | 2: Is it locally specific? |
| GN.25 | Buffer Zones around Mineral Sites | Effective – minor amendment may be required | - |
| GN.26 | Residential Development | Revise based on LHMA and viability and to consider stakeholder feedback | 3: Will it be effective? |

| Policy Number | Policy Name | Comment | Test of Soundness addressed by this change |
|---------------|--|--|---|
| GN.27 | Residential Allocations | Revise – some housing sites delivered and review of undeveloped sites required | 3: Can sites allocated be delivered? |
| GN.28 | Local Needs Affordable Housing | Effective - Revise to reflect contextual change and to consider stakeholder feedback | 3: Will development be viable? |
| GN.29 | Exception Sites for Local Needs Affordable Housing | Effective – minor amendment may be required and to consider stakeholder feedback | - |
| GN.30 | Specialist and Supported Accommodation | Effective – minor amendment may be required | - |
| GN.31 | Gypsy Traveller Sites and Pitches Allocation | Revise – review of allocations | 3: Can sites allocated be delivered? |
| GN.32 | Gypsy Traveller Sites and Pitches | Effective – revise to reflect contextual change and to consider stakeholder feedback | 1: Does it have regard to national policy and WSP 1: Does it have regard to Well-being Goals |
| GN.33 | Community Facilities | Revise – review of undelivered sites required and to address stakeholder feedback | 3: Can sites allocated be delivered? 3: Will development be viable? |
| GN.34 | Protection and Creation of Outdoor Recreation Areas | Effective – minor amendment may be required | - |
| GN.35 | Protection of Open Spaces with Amenity Value | Effective – minor amendment may be required | - |
| GN.36 | Green Wedges | Effective policy. Amendment may be required to spatial extent. | 2: Is it locally specific? |
| GN.37 | Protection and Enhancement of Biodiversity | Review – contextual update required and to consider stakeholder feedback | 1: Does it have regard to national policy and WSP? |
| GN.38 | Protection and Enhancement of the Historic Environment | Revise to ensure effective policy and to consider stakeholder feedback | 1: Does it have regard to national policy and WSP? |

| Policy Number | Policy Name | Comment | Test of Soundness addressed by this change |
|---------------|--|--|--|
| GN.39 | Transport Routes and Improvements | Revise- some transport schemes delivered and review of undelivered schemes required and to consider stakeholder feedback | 3: Can the sites allocated by delivered? |
| GN.40 | New Waste Management Facilities | Revise –some allocations delivered and review of undelivered sites required and to consider stakeholder feedback | 3: Can the sites allocated by delivered? |
| GN.41 | Waste Minimisation, Re-use, Recovery, Composting and Treatment | Effective – minor amendment may be required to consider stakeholder feedback | - |
| GN.42 | Disposal of Waste on Land | Effective – minor amendment may be required to consider stakeholder feedback | - |