

COVID-19 Impact Assessment for Pembrokeshire County Council's Local Development Plan 2 – Evidence Base, Policies and Strategy

October 2020

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Background

- 1. On the 23rd March 2020, the UK introduced a full lockdown in response to the global Covid-19 pandemic. The pandemic has caused significant loss of life in the UK and across the world. The resulting lockdown together with ongoing significant changes in everyday behaviours and routines are resulting in significant economic, social and cultural changes.
- 2. In July 2020, the Welsh Government Minister for Housing and Local Government sent a letter to all Local Authority Leaders and Chief Executives. In this letter, she requested that Local Authorities reflect on the impact of the pandemic on their areas and consider the consequences for LDPs under review or being implemented. The letter suggested that those LDPs currently undergoing review, which have not yet been submitted to the Planning Inspectorate for examination, should undertake an assessment of the evidence base, strategy and policies in terms of sensitivity to the consequences of the pandemic. This assessment should be submitted to the Welsh Government with requests to extend Delivery Agreements. Pembrokeshire County Council is one of the authorities whose LDP 2 is under review, but which has not yet submitted its replacement Plan to the Welsh Government.
- 3. This document is the Pembrokeshire County Council assessment of the implications of Covid-19 on Pembrokeshire's County Council's Local Development Plan 2, its evidence base, policies and strategy. It identifies which areas of the LDP's evidence base might require updating or where new research is necessary. It also sets out those areas where policy changes are likely as a response to the impacts of the pandemic and summarises the potential effects on the overall LDP strategy. This document should be read in conjunction with the Authority's revised Delivery Agreement (2020) which sets out a revised timetable and community involvement scheme for the Local Development Plan 2.

Stage of Plan Preparation

- 4. Pembrokeshire County Council consulted on its Deposit Plan between January 15th and 18th March 2020. The consultation was not affected by the lockdown introduced later in March. As a result of the consultation, the Local Planning Authority (LPA) received a significant volume of representations. There will be areas of the Plan that the LPA wishes to change, or on which it will need to gather additional evidence, as a direct result of representations received. In addition to this, there are specific areas of evidence base, policies and strategy that may require amendment because of sensitivity to the impacts of Covid-19.
- 5. The Authority has the opportunity to identify Focussed Changes that it wishes to make to the Deposit Plan. Following the updates to the evidence base identified below, the Authority intends to prepare Focussed Changes to the Plan for public consultation in Spring 2021. This will allow the Authority to introduce any changes identified as necessary to the Plan's policies and strategy. Following this consultation, the Authority will then submit the Deposit Plan as revised through Focussed Changes to the Welsh Government.

Welsh Government Planning Policy Position

- 6. The Welsh Government's national planning policy framework remains Planning Policy Wales as supported by Technical Advice Notes. In July 2020, Welsh Government released a document: Building Better Places, The Planning System Delivering Resilient and Brighter Futures, Place making and Covid-19 Recovery. The document sets out the Welsh Government's planning policy priorities that will assist in taking action in the recovery period after the Covid-19 pandemic crisis. The document stresses the importance of building a greener cleaner society, with decarbonisation and social justice at its heart and which respects the environment, whilst giving people good places to live in which are accessible on foot, bike and public transport.
- 7. The document identifies particular areas of existing national policy that should be the focus of consideration and action, in order to act as a catalyst for a recovery across the pillars of sustainable development. The eight issues identified are:
- Staying local: creating neighbourhoods
- Active travel: exercise and rediscovered transport methods
- Revitalising our town centres
- Digital places: the lockdown lifeline
- Changing working practices: our future need for employment land
- Reawakening Wales' tourism and cultural sectors
- Green Infrastructure, health and well-being and ecological resilience
- Improving air quality and soundscapes for better health and well-being.

Strategy Implications

8. The LDP has been developed with a focus on sustainable development and to be in accordance with the Welsh Government Wellbeing of Future Generation goals and Pembrokeshire Well-being Plan objectives. The Deposit LDP was based on the policy context and key challenges identified from background evidence and consultation with stakeholders. The key challenges, which were developed into objectives for the Plan to meet, will be assessed against the Building Better Places document.

Vision and Objectives

9. The Vision of the Deposit LDP is:

In 2033 Pembrokeshire is a place with strong resourceful communities, where challenges of rurality and climate change are successfully tackled. A distinctive sense of place exists based on its natural landscape, cultural, built and linguistic heritage. Homes are provided for all and a strong economy enables people of all ages to live, work and thrive in the County. Employment opportunities linked to start-up businesses, tourism, rural diversification, the green and blue energy industry and new sectors linked to the strategic opportunities provided by the Milford Haven Waterway and links to Ireland are promoted. Town Centres are vibrant places where a range of uses take place. Development is supported by key infrastructure. Across the County green infrastructure and biodiversity are enhanced with accessible and healthy environments delivered for both people and wildlife.

- The Vision is considered to provide a distinctive and local perspective on the national policy framework, which seeks to tackle the key challenges facing Pembrokeshire. To deliver the Vision, 11 Objectives (A-J) were identified.
- 11. In order to ensure that the Vision and Objectives are relevant post-Covid-19 an assessment has been undertaken to identify if they cover the priorities and actions for places identified by Welsh Government in Building Better Places (Welsh Government, July 2020). See table 1 and the following commentary.

Table 1: Assessment of LDP Objectives against WG priorities and actions for places post Covid-19

WG Priorities	Staying local	Active travel	Revitalising our towns	Digital places	Changing working practices	Re-awakening Wales' tourism and cultural sectors	Green Infrastructure health and well- being and ecological resilience	Improving air quality and soundscape for better health and well-being
LDP Objective								
A) Mitigate and respond to the challenge of Climate Change	v	v		v	V		V	V
B) Delivery high quality development where place making is supported by sustainable design which responds appropriately to cultural and built heritage, landscape and townscape	v	v	v	v	V	V	V	v
C) Sustain and enhance the rural and urban economy by supporting start-up businesses, rural diversification, changing agricultural practices, the visitor economy, and the expansion of Small and Medium Enterprises	v		v	v	v	V		
D) Sustain resourceful communities by providing a range and mix of homes supported by key community facilities and services	v	v		v				

WG Priorities	Staying local	Active travel	Revitalising our towns	Digital	Changing working practices	Re-awakening Wales' tourism and cultural sectors	Green Infrastructure health and well- being and ecological resilience	Improving air quality and soundscape for better health and well-being
E) Build on the County's strategic								
location for green/blue energy,								
maritime and port related					V			
development.					V			
F) Protect and promote the Welsh						V		
language G) Support a range of uses in						•		
Town Centres to assist								
regeneration	V		V		V			
H) Promote accessible and								
healthy environments for both								
people and wildlife through the								
protection and delivery of green infrastructure	v	v	v				v	v
I) Improve access to goods and								
services by facilitating								
improvements in infrastructure								
and community facilities and								
directing development to	v	V	V	v	V		v	
sustainable locations		V	V	V	V			
J) Protect and enhance the								
County's environment, biodiversity and habitats.						V	V	V
K) Prevent waste arising and						-	-	-
ensure resources are used								
responsibly.							V	

Staying Local: Creating neighbourhoods

12. This is fully covered by objectives for the Plan.

Active travel: exercise and rediscovered transport methods

13. Objectives H and I whilst not explicitly using the term active travel address this point.

Revitalising our Town Centres

14. This is fully covered by objectives for the Plan.

Digital places – the lockdown lifeline

15. The footnote to Objective I notes that Infrastructure includes mobile and broadband provision, transport improvements and sewerage capacity. The Objectives therefore recognise the importance of broadband connectivity.

Changing working practices - our future need for employment land

16. Objectives B, C, E,G and I reflect the Plan's recognition of the many changes that are taking place currently in Pembrokeshire's economy which may be exacerbated by Brexit and Covid-19. These changes include changing agricultural practices, the move towards a Green/Blue economy, an increased focus on the visitor economy and the need to support new start-ups. Whilst there is no specific reference to home working – this is encompassed by Objective B. The Plan has sought to achieve a flexible strategy that can adapt to the economic opportunities that will emerge in the next 15 years.

Reawakening Wales' tourism and cultural sectors

17. The Plan and its Objectives recognise the key role that tourism plays in the Pembrokeshire economy and the importance of cultural sectors.

Green Infrastructure, health and well-being and ecological resilience

18. The importance of addressing these issues is recognised in the Plan's objectives.

Improving air quality and soundscapes for better health and well-being

19. Improving air quality and soundscapes are not explicitly identified in the objectives, but form an essential part of delivering objectives B and H and will be delivered as a part of tackling climate change (objective A).

The Strategy

Evidence Base

- 20. The Authority has assessed its Evidence Base (see Appendix 1) and identified those areas with a sensitivity to Covid-19 and those areas where revised or updated assessments will be required.
- 21. The key areas of the evidence base that the Authority is seeking to re-assess, update or create as a direct consequence of Covid-19 are in relation to:

- a) Retail and Town Centres
- **b)** Housing Viability Assessments
- c) Housing Requirement
- d) Economy strategic sites and specific sectors including Tourism
- e) Broadband provision, digital technology and telecommunications
- f) Open Space

Sustainable Strategy

22. LDP 2 proposes that growth should be distributed across the Plan area in accordance with a spatial strategy that promotes sustainable development. A key element of this is the Settlement Hierarchy, which groups settlements into different categories, based on the services and facilities found within them. The plan therefore already embeds many of the things that Welsh Government is advising Local Planning Authorities to consider in the context of the Covid-19 pandemic. For instance, by matching provision of new housing to availability of services and facilities, this will help people to stay local. In addition, in the context of sustainable travel, the settlement hierarchy has taken into consideration opportunities for active travel, so new housing provision will tend to favour locations where there are opportunities for walking, cycling and use of public transport. Connectivity between towns and smaller settlements will help with the revitalisation of town centres as places where people can meet safely and undertake a variety of activities.

Policies

- 23. The Strategic Policies of the Plan have been tested for their sensitivity to Covid-19; with identified actions for those areas where amendments may be necessary (see Appendix 2). The following policy areas may be amended through Focussed Changes as a specific response to the likely consequence of Covid-19:
- a) Specific Town Centre boundaries and frontages as well as retail policy wording
- **b)** Affordable housing targets and the requirements for individual sites set out within Development Sites and Infrastructure SPG following updated viability appraisals prepared in conjunction with site proponents
- c) The overall level of housing growth identified
- d) The overall level of employment land identified and jobs target.
- e) Specific housing allocations identified
- f) Specific policy wording on Employment, Tourism and Agriculture may change and specific allocations may be removed or added.
- g) Specific policy wording and requirements around broadband are likely to change to reflect the increased importance of remote working and updated information from broadband providers. References in the plan to digital technology and telecommunications will expand.
- h) Specific wording around Amenity open spaces and the opportunities linked to community growing schemes will be introduced. Detailed Place Plan SPG will be brought forward post LDP adoption to support communities' decision-making around open spaces in their areas. This will build on the Plan's existing evidence base set out in the Pembrokeshire Green Infrastructure Plan and the existing open space and green wedge designations.

- 24. Detailed Specific additional policy guidance in the form of Supplementary Planning Guidance to support GN. 13 Housing Mix, Space standards and requirements for Lifetime Home Standards around spaces within homes and outside space.
- 25. Other policy revisions may also be suggested as Focussed Changes a result of points made through representations to the Plan, and because of other contextual changes identified through the wider evidence base assessment.

Spatial Strategy

- 26. As set out in Paragraph 22, the Authority considers that the fundamental approach, which sits behind the Sustainable Settlement Strategy, included within the Plan addresses many of the issues that Welsh Government has highlighted as being key in terms of the response to Covid-19; this includes Staying Local and Active Travel. The Authority does not consider that there is likely to be a need to re-assess the 60/40 urban/rural spatial strategy set out within the LDP 2 Deposit Plan because of Covid-19, but will examine representations received on the strategy in response to the consultation.
- 27. The overall level of housing growth will be re-assessed in light of emerging evidence. Feedback from the Council's developer survey for 2020 indicated that whilst local developer's had had short term difficulties in accessing materials during Spring/Summer 2020, the majority of those surveyed did not consider that the pandemic was likely to impact on their short or medium term plans in terms of developing sites. Early evidence of house market sales has shown a rise in sales of properties in rural areas, but it is unclear whether job losses in conjunction with a recession will mean a longer term less buoyant housing market. It is also possible that changing market conditions will affect the viability of development sites; if build costs or land values and house prices vary. The Authority will update its Housing Availability report this year, and will also re-work its Viability evidence. The site proponents for large allocations have been asked to provide detailed Viability Appraisals for their sites to inform this work. The Plan's policies and monitoring framework also provide flexibility in relation to viability changes.
- 28. The Authority will re-consider both a revised Local Housing Market Assessment and Demographic data, including updates based on 2018-base population projections when assessing its housing strategy. Information from site proponents will inform an updated Housing Trajectory. In the longer term, it is possible that increases in job losses may exacerbate the already significant need for affordable housing in Pembrokeshire, however the Plan's strategy is already predicated on maximising delivery of affordable housing in the context of what is viable.
- 29. The level of employment land and policy approaches to existing and new sites will be re-assessed in light of emerging evidence. However at this stage it appears unlikely that additional evidence will indicate a need for changes that are significant enough to fundamentally change the Strategy of the Plan from that set out in the Deposit version.
- 30. Whilst Covid-19 may exacerbate specific issues such as a declining town centre or the need for broadband to ensure access to services and working from home, these

are issues already identified within the Plan. There may be a need to refine policy approaches in relation to some of these issues, but these changes are unlikely to affect fundamentally the wider strategy of the Plan. Covid-19 has also increased the focus on the importance of access to green infrastructure and appropriate spaces within housing. Again, these are issues already addressed within the LDP Deposit Plan and the Authority are likely to add to the existing approach in this area through Supplementary Planning Guidance, without significant changes to the Plan being required.

Conclusion

- 31. In summary, whilst the implications of Covid-19 are wide-ranging and in some cases have yet to fully emerge, the LDP 2 is based on a strategy which is focused on sustainable settlements, deliverability and ensuring flexibility for a range of scenarios across a 15 year period.
- 32. The Strategy and supporting Strategic Policies are generally in conformity with national planning policy as set out in Planning Policy Wales (Edition 10). The Vision is distinctive and this together with the objectives of the Plan cover all the priorities and actions identified in the Building Better Places document. Following updates to the evidence base amendments are likely to be required through Focussed Changes to strengthen or refine the focus of the Plan in specific areas as a response to Covid-19, but these are unlikely to result in significant strategic changes to the LDP.

Next Steps

33. The Authority is requesting an amended Delivery Agreement with a revised Timetable and Community Involvement Scheme. This revised Timetable reflects a need to undertake the additional work identified in this paper, prior to the publication of Focussed Changes. The revisions proposed to the Community Involvement Scheme, reflect the uncertainty around Covid-19 and the need to undertake future consultations in a socially distanced manner and potentially in the context of further lockdowns.

Appendix 1: Assessment of Evidence Base Sensitivity to Covid-19 Impacts

		the data was welled	
		Update required	
		because of Deposit	
		representations/new	
Evidence base	Sensitivity to	contextual issues	
paper	Covid-19	emerging	Commentary
PCC and PCNPA		Update to reflect PCNPA	An updated SOCG will be
Statement of		Inspector's report and any	prepared prior to
Common Ground		changes introduced as FCs	submission of the
(2018)	Not sensitive	to PCCs Plan	Pembrokeshire LDP.
		Welsh Government have	
		advised that the Covid-19	
		Assessment for the LDP	
		will update this document	No update will be
		in relation to sensitivity to	published - the Covid-19
		impacts of Covid-19 on	Assessment provides an
Review Report	Not applicable	the LDP.	updated position on this.
		A Consultation report on	No update required. A
		the Deposit Plan	new consultation report
		representations will be	will be prepared
Initial Consultation		prepared and presented	addressing Deposit Plan
Report	Not sensitive	to Full Council in 2021.	representations.
Equalities Impact			
Assessment			
Preferred Strategy	Not sensitive		No update required.
			No update required. A
		A new assessment will be	new assessment will be
Equalities Impact		required to address	published in relation to
Assessment Deposit		Focussed Changes	any Focussed Changes
Plan	Not sensitive	identified.	identified.
Feedback from			
Stakeholder, Member			
and Town and			
Community Council			
workshop September			
2018: Strategic			
Options	Not sensitive		No update required.
Feedback from the			
public September			
2018: Strategic			
Housing Options	Not sensitive		No update required.
Feedback from Town			
and Community			
council workshops			
Jan 2019: Pre Deposit			
Consultation	Not sensitive		No update required.

		Update required because of Deposit	
		representations/new	
Evidence base	Sensitivity to	contextual issues	
paper	Covid-19	emerging	Commentary
Feedback from			connicitally
Stakeholders			
workshop Jan 2019:			
Pre Deposit			
consultation	Not sensitive		No update required.
Retail and			
Commercial Centres		Yes -Welsh Government	
Background Paper -		Building Better Places	An updated paper will be
Update July 2019	Highly sensitive	updated policy guidance	produced.
		Building better places advises ' retail	
		assessments in	
		development plans should	
SW Wales Regional		be replaced with town	
Retail Study - Final		centre assessments'.	
Report - February		Anticipate a short	
2017, Appendices,		additional paper	
Erratum,		confirming that CS were	
Presentation and		invited and whole centre	A short additional paper
Summary	Sensitive	policy approach.	will be produced.
			Any updated information
Fishguard and			or projects developed by colleagues in
Goodwick Strategic			Regeneration will be
Regeneration			assessed in the
Framework - April			development of Focussed
2019	Sensitive		Changes.
			Any updated information
			or projects developed by
			colleagues in
Pembroke Strategic			Regeneration will be
Regeneration			assessed in the
Framework - February 2018	Sensitive		development of Focussed Changes.
	JEIISILIVE		Any updated information
			or projects developed by
Pembroke Dock			colleagues in
Strategic			Regeneration will be
Regeneration			assessed in the
Framework -			development of Focussed
February 2018	Sensitive		Changes.
Milford Haven DRAFT			Any updated information
Strategic			or projects developed by
Regeneration	Sonsitivo		colleagues in
Framework July 2018	Sensitive		Regeneration will be

		Update required	
		because of Deposit	
		representations/new	
Evidence base	Sensitivity to	contextual issues	
paper	Covid-19	emerging	Commentary
pape.		0	assessed in the
			development of Focussed
			Changes.
			Any updated information
			or projects developed by
			colleagues in
			Regeneration will be
Haverfordwest, A			assessed in the
Vision for the Future			development of Focussed
August 2016	Sensitive		Changes.
		A supplementary paper	
		might be needed once NDF is adopted,	
		depending on how that	
		document identifies solar	
Renewable Energy		priority areas and in	
Assessment and		relation to	
Appendices April		representations received	Potential for updated
2017	Not sensitive	on the Deposit Plan.	papers to be produced.
Renewable Energy			
Supplementary		.	
Background Paper	No sensitive	No updates anticipated	LDA honor to publich 2010
			LPA hopes to publish 2019 accommodation
			assessment once WG
Gypsy Traveller			Minister approves this.
Accommodation		WG response to 2019	Submitted September
Assessment 2015	Not sensitive	update awaited.	2019.
		This paper is being	
		updated in light of the	
		latest 2018-based	
		projections. Covid-19 has	
		led nationally to higher	
		death rates, but these are very limited to date in a	
		Pembrokeshire context.	
		Longer term potential	
		impacts on migration may	
		result from Covid-19 but	
Demographic		these are extremely	
Forecasts Paper		difficult to predict and the	A Demographic Forecasts
Addendum		paper will focus on	update will be produced
December 2018	Some sensitivity	historic trends.	in 2020.

		Update required	
		because of Deposit	
		representations/new	
Evidence base	Sensitivity to	contextual issues	
	Covid-19		Commonton
paper	C0vid-19	emerging	Commentary
Background paper		Not anticipated to require	
Welsh Language July		a formal update to the	
2019 Defining Cattlement	Not sensitive	evidence base	No update anticipated.
Defining Settlement			
Clusters Report May			No undete enticipated
2019	Not sensitive		No update anticipated.
Assessment of	Somo consitivity		
Specialist Housing and Accommodation	Some sensitivity depending on		No update anticipated –
Need for Older			picked up in Local Report
	migration	2/2	LHMA update.
People in West Wales	patterns.	n/a	LHIVIA update.
Housing and Accommodation			
Accommodation Needs Assessment	Somo consitiuit		
for People with	Some sensitivity depending on		No update anticipated –
Learning Disabilities			picked up in Local Report
in West Wales	migration patterns.	n/a	LHMA update.
	Some	li/a	LINIA upuate.
	sensitivity, but		
	already addressed in		The encourse and of the
	the		The assessment of the current role and function
			of rural settlements
	methodology used. The		
			includes scoring for those accessed via train and bus
	pandemic has reaffirmed the		
			routes. The pandemic has reaffirmed the
	importance of		
	communities		importance of directing development to the most
	being able to access facilities	Some detailed issues	sustainable settlements.
	easily and this	emerging from	A minor update is
	evidence base	representations to be	anticipated in response to
Rural Facilities Survey	paper focusses	addressed through an	representations received
Report 2019	on this issue.	update	to the Deposit Plan.
	Some		
	sensitivity,		
	however as		
	with the rural		
	facilities report		
	- the		
	importance of		
	communities		
	accessing		
Urban Settlements	services is		
Report	inbuilt into the	No updates anticipated	No update anticipated.
перон			no apaate anticipatea.

Evidence base paper	Sensitivity to Covid-19	Update required because of Deposit representations/new contextual issues emerging	Commentary
	methodology of this report.		
Calculation of Windfall allowance	Some sensitivity - windfall estimates are based on historic monitoring and there may be a lower figure for this year, partly due to limitiations in monitoring, however flexibility and appropriate monitoring built into the Plan should mitigate.	Update required to address any representation issues and update based on 2020 April desktop survey.	Update will be published in 2020.
Gypsy and Traveller Background Paper - Dec 2019 Local Housing Market	Not sensitive	An update will be prepared to address issues raised in representations.	Update will be published in 2020.
Assessment 2014 Settlement Boundary		yes	
, Methodology	Not sensitive	No	No update anticipated.
Spatial Strategy	Some sensitivity - Covid-19 has emphasised the importance of local facilities and sustainable settlements. The strategy of the Plan already	Update may be produce	Update may be published
Background Paper 2019	seeks to address this by	to address issues raised in representations	alongside Focussed Changes.

		Undato required	
		Update required because of Deposit	
		representations/new	
Evidence base	Sensitivity to	contextual issues	
paper	Covid-19	emerging	Commentary
μάροι	supporting		connicituity
	sustainable		
	settlements in		
	both the Urban		
	and Rural areas of the		
	Authority.		
	, action cy.		
	Sensitive - there may be		
	increases to		
	build costs and		
	land values		
	because of		
	Covid-19. There may also		
	be an increase		
	in those		
	requiring	All site proponents of	
	affordable	large allocations have	
	housing	been asked to submit	
Local Housing	because of job losses. This will	detailed Viability Appraisals, which will	Update anticipated in
Viability Assessment	be updated.	inform a wider update.	2020.
		Updates received as	
		Deposit representations	
Droft Davalance		from key providers such	
Draft Development Sites and		as Dwr Cymru will be included in an updated	Update anticipated in
Infrastructure SPG	N/A	draft.	2020.
		A regional update to the	A regional update to the
		LHMA has been produced.	LHMA has been produced.
		The Authority will also	The Authority will also
		work on a Local Report later in 2020/early 2021	work on a Local Report later in 2020/early 2021
		which will pick up on	which will pick up on
Extract from Draft		potential changes to	potential changes to
LHMA 2019		affordable housing and	affordable housing and
Wheelchair and older		population structure as a	population structure as a
person housing and Regional Draft LHMA	Some sensitivity	result of Covid-19 and wider contextual issues.	result of Covid-19 and wider contextual issues.
	Some sensitivity	while contextual issues.	

		Update required	
		because of Deposit	
		representations/new	
Evidence base	Sensitivity to	contextual issues	
	•		
paper	Covid-19	emerging	Commentary
	Highly sensitive		
Local Employment	- will be		
Trends December	addressed by		Update to TCES will
2018	updates to TCES		address
			A 2020 update of the TCES
			will be undertaken,
			reflecting the outcome of
			Brexit and the impacts of
			Covid-19. Whilst there is
			still a great deal of
	Highly sensitive		uncertainty over the
	- flexibility is		potential economic
	likely to be key		impacts, this update will
	in order to		consider which sectors
	ensure the		are particularly vulnerable
	Authority can		in a Pembrokeshire
Two County	respond to		context and will assess
Economic Study,	uncertainties		whether the overall
Appendices and	over the	Issues raised through	allocations and policies of
Interventions and	economic	representations will be	the Plan provide sufficient
Strategic Sites	impacts of the	addressed through an	flexibility to respond to
Summary Report	pandemic.	update.	varying scenarios.
	Not sensitive -		
	this paper is		
	focussed on		
	landscape		
	capacity, which		
	has not been	Not anticipated to require	
Caravan Landscape	impacted by	a formal update to the	
Capacity Study	Covid-19.	evidence base	Not anticipated
	Not sensitive -		
	this paper		
	focused on data		
	on existing sites	Not anticipated to require	
Caravan Background	and	a formal update to the	
Paper	permissions	evidence base	Not anticipated
	High Sensitivity		
	-		
	accommodation		
	providers have		
	been affected		
	by lockdown,		
	but longer term	Not anticipated to require	
Tourism Background	the trend for	a formal update to the	Update anticipated in
Paper	people to	evidence base	2020.

		Update required	
		because of Deposit	
		representations/new	
Evidence hace	Consitivity to	•	
Evidence base	Sensitivity to	contextual issues	
paper	Covid-19	emerging	Commentary
	holiday in the		
	UK may actually		
	increase		
	demand.		
	Some limited		
	sensitivity		
	linked to		
	construction		
	demand, but as		
	UK policy is to	The Regional Technical	
	grow ourselves	Statement is being	
	out of the	updated (2nd Review);	
	economic	however this update will	
	downturn, it is	be addressed through a	
	likely that	Sub-Regional Statement	
	mineral use will	of Collaboration (which	
Minerals Background	return to	will supersede the	
Paper	previous levels.	previous SOCG).	No update anticipated.
	Not sensitive -		
	Covid-19		
	unlikely to	Once the Regional	
	change the	Technical Statement 2nd	
	projected	review is finalised, a Sub-	
	figures within	Regional Statement of	
	the Regional	Collaboration will be	A Sub-Regional Statement
	Technical	produced, which will	of Collaboration will be
Minerals Statement	Statement 2nd	supersede the earlier	produced, once the RTS
of Common Ground	Review.	SoCG.	2nd Review is finalised.
Waste Background			
Paper	Not sensitive	No	No update anticipated.
	Sensitive - the		
	importance of		
	Green		
	Infrastructure		
	has been		
	highlighted by		
	Covid-19,		
	however the		
	Authority has		
	already		
Green Infrastructure	published a		
Plan	detailed Plan	No	No update anticipated.

		Update required	
		because of Deposit	
		representations/new	
	c	•	
Evidence base	Sensitivity to	contextual issues	
paper	Covid-19	emerging	Commentary
	for its Towns,		
	which will		
	inform Place		
	Plan SPG once		
	the LDP is		
	adopted.		
		Some detailed issues	
		emerging from	
		representations to be	
Green Wedge		addressed through an	Update anticipated in
Background Paper	Not sensitive.	update	2020.
	Sensitive - the		
	importance of		
	Open Spaces as		
	a form of Green		
	Infrastructure		
	has been		
	highlighted by		
	Covid-19;		
	however, the		
	Authority has		
	already		
	surveyed its		
	open spaces		
	and designated		
Open Space	these within	Yes - some amendments	
Assessment	the Deposit	and areas not previously	Update anticipated in
Background Paper	Plan.	identified.	2020.
Landscape Character			
Assessment	Not sensitive	No	No update required.
Strategic Flood			
Consequence			
Assessment	Not sensitive	No	No update required.
Now Evidence			
New Evidence Required			
	Sensitive -		
	lockdown	New information received	
Broadband	highlighted the	from BT Openreach	New background paper
Background Paper	importance of	requires the publication	will be produced in 2020.
		· equiles the publication	

Sensitivity to Covid-19 broadband connectivity	because of Deposit representations/new contextual issues emerging of a new background paper.	Commentary
Netconsitive	Vec	New background paper will be produced in 2020.
	Covid-19 broadband	Sensitivity to Covid-19representations/new contextual issues emergingbroadband connectivityof a new background paper.

Appendix 2: Assessment of Strategic Policies Sensitivity to Covid-19 Impacts

Strategic Policy	Potential Covid-19 Impacts	PCC mitigation	Approach/ Action required
SP1: Creating Sustainable Places	 No impact This policy is a criteria based policy that is not impacted by Covid-19 but which supports the delivery of the Well–Being of Future Generations Act and delivers the requirements of Building Better Places. 	None.	None.
SP2: Housing Requirement	 Levels of Housing Growth Uncertainty over future demand for housing linked to a changing market, potential recession and potential differing migration patterns following Covid-19. Updated 2018 based population projections have been produced by ONS, but these reflect only historic migration trends. 	Updates to the evidence base in relation to Demographic analysis and a Local Housing Market Assessment may require a Focussed Change to the Housing Requirement and individual allocations. Updates to monitoring on windfall completions may require amendments to the Housing Requirement. Discussion is taking place with owners and developers of sites to determine any revisions required to the housing trajectory.	 Update evidence base and assess whether or not the overall level of growth identified requires amendment. Develop Focussed Changes on housing allocations if required. Update the Housing trajectory within the Plan, following information from developers of sites. The Monitoring Framework already provides indicators on housing delivery and the housing trajectory.

Strategic Policy	Potential Covid-19 Impacts	PCC mitigation	Approach/ Action required
SP3:	Lovels of Affordable Housing	Flexibility and monitoring already built into the Plan will enable the Plan to overcome any uncertainties.	- Fooupood Chongoo mov ho
SP3: Affordable Housing Target	 Levels of Affordable Housing The viability of development sites may change if house prices alter significantly or build costs/land values change as a result of recession. There may be an increased number of people in need of affordable housing, depending on the longer- term impacts on the economy and job losses resulting from Covid-19. In-migration may increase as a consequence of Covid-19, with potential impacts on house prices and worsening existing affordability pressures. 	Proponents of larger housing allocations have been asked to provide viability appraisals, which will inform any amendments to policy targets. The Plan approach already seeks to maximise affordable housing delivery based on viability and deliverability. The Plan policies provide flexibility in cases where viability changes over the Plan period. The Plan's monitoring framework already provides indicators on viability and affordable housing delivery.	 Focussed Changes may be introduced to change Affordable Housing targets on individual sites and for windfall sites where this is demonstrated as necessary by updated evidence. The Monitoring Framework of the Deposit Plan already provides indicators to address the risks associated with uncertainty on viability.
SP4: Supporting Prosperity	Levels of Economic Growth	The Plan aims to provide a flexible economic strategy that enables development to respond to changing	 FCs may be require in response to updated evidence base, amending the overall level of employment land and jobs figures.

Strategic Policy	Potential Covid-19 Impacts	PCC mitigation	Approach/ Action required
	 Difficulty predicting likely impacts on jobs and employment land Experian updates in Sept 2020 will include Covid impacts, but some long term effects are not yet clear and may depend on the severity of the second wave. Potentially less demand for office space moving forwards. More demand for homeworking/start-ups. Impact of economic recession because of Covid-19, Brexit and structural changes. 	circumstances. The Two County Economic Study is being updated in light of COVID-19 and will inform any Focussed Changes required in relation to the overall land supply identified and the job number target. Monitoring mechanisms exist in the Plan to address the risks associated with uncertainty.	 The Monitoring Framework of the Plan already includes targets to monitor take up of strategic employment sites and monitor the overall development of employment land.
SP5:	Settlement Strategy	The hierarchy is based on a	The Monitoring Framework of the
Settlement	This policy identifies a	weighted scoring system, which	Deposit Plan already provides
Hierarchy - A Sustainable	Settlement hierarchy based	means the sustainability of a	indicators to assess the levels of
Sustainable	on functional characteristics and the	settlement is assessed as a result of its overall combined	services and community facilities within settlements.
Strategy	availability of services and	functional characteristics. Small	within settlements.
Charley	facilities (including	individual changes within	

Strategic Policy	Potential Covid-19 Impacts	PCC mitigation	Approach/ Action required
	 sustainable transport). This policy delivers on the Building Better Wales priorities of Staying Local and Active Travel. There could be some limited impacts on the hierarchy if facilities are lost as a result of Covid-19 (public houses, shops etc.) which would affect the sustainability of some settlements. 	settlements will not significantly impact on the overall settlement strategy. Indicators within the Monitoring Framework will enable the monitoring of services within individual settlements.	
SP6: Settlement Boundaries	 No Impact. This is a criteria based policy, which seeks to ensure development takes place in appropriate locations and that the landscape is protected through the identification of settlement boundaries. It accords with PPW and helps deliver Building Better Places actions in relation to Staying local and 	None.	None.

Strategic Policy	Potential Covid-19 Impacts	PCC mitigation	Approach/ Action required
	the ecological resilience aspects of Green infrastructure.		
SP7: Regional Growth Centres and Urban Settlements	 No impact This policy is a criteria based policy that is not impacted by Covid-19 but which supports many of the requirements of Building Better Places in terms of delivering place making. 	None.	None.
SP8: Narberth Rural Town, Service Centres and Service Villages	 No impact This policy is a criteria based policy that is not impacted by Covid-19 but which supports many of the requirements of Building Better Places in terms of delivering place making 	None.	None.

Strategic Policy	Potential Covid-19 Impacts	PCC mitigation	Approach/ Action required
SP9: Local Villages	 No impact This policy is a criteria based policy that is not impacted by Covid-19 but which supports many of the requirements of Building Better Places in terms of delivering place making 	None.	None.
SP10: Countryside	 No impact This policy is a criteria based policy that is not impacted by Covid-19 but which supports many of the requirements of Building Better Places in terms of delivering place making. 	None.	None.
SP11: Maintaining and Enhancing the Environment	 Environment and Open Space This is a policy, which seeks to maintain and enhance the natural environment and promote connectivity of ecosystems as well as delivering appropriate access to green infrastructure. The policy accords with PPW and helps deliver Building Better Places action on 	Further detailed work in this area is likely to be in the form of Place Plan SPG. A minor amendment to the Amenity Open Space policy has been identified as a necessary Focussed Change, to clarify that community growing schemes are appropriate in these areas.	 Specific wording around Amenity open spaces and the opportunities linked to community growing schemes will be introduced as a Focussed Change. Detailed Place Plan SPG will be brought forward post LDP adoption to support communities' decision making around open spaces in their areas. This will build on the Plan's existing

Strategic Policy	Potential Covid-19 Impacts	PCC mitigation	Approach/ Action required
	Green Infrastructure and on Improving air quality and soundscapes for better health and well-being.		evidence base set out in the Pembrokeshire Green Infrastructure Plan and the existing open space and green wedge designations.
SP12: Port and Energy Related Development	 Port and Energy This is a criteria based policy which supports the development of appropriate port and energy related uses building on the strategic location of the Ports of Milford Haven, Fishguard and the Haven Waterway Enterprise Zone. The economic recession may affect port developments and there may be an increasing move to renewable technologies and other non-carbon technologies, such as hydrogen, following Covid-19. 	The policy provides a flexible framework for appropriate uses relating to port and energy developments, which can deal with a range of economic scenarios. The Monitoring Framework sets out indicators, which will monitor development in port locations.	 No change to the policy anticipated as a result of Covid- 19. The Monitoring Framework sets out indicators for development proposals in port locations.

Strategic Policy	Potential Covid-19 Impacts	PCC mitigation	Approach/ Action required
SP13: Strategic Employment Provision	 Strategic Employment Provision Difficulty predicting likely impacts on jobs and employment land Experian updates in Sept 2020 will include Covid impacts, but some long- term effects are not yet clear and may depend on the severity of the second wave. Potentially less demand for office space moving forwards, but too early to be certain of long-term trend. More demand for home working and small-scale business start-ups. Impact of economic recession as a result of Covid-19, Brexit, de- carbonisation and structural changes. 	The Plan aims to provide a flexible economic strategy that enables development to respond to changing circumstances. The Two County Economic Study is being updated in light of COVID-19 and will inform any Focussed Changes required in relation to specific Employment Allocations. Monitoring mechanisms exist in the Plan to address the risks associated with uncertainty	 FCs may be required in response to updated evidence base, to amend specific allocations. The Monitoring Framework of the Plan already includes targets to monitor take up of strategic employment sites and monitor the overall development of employment land.

Strategic Policy	Potential Covid-19 Impacts	PCC mitigation	Approach/ Action required
SP14: Retail Hierarchy	 Retail Town centres have been hard hit by lockdown with comparison shops closed for a long period of time. Changes in peoples shopping habits will affect town centres. Closure of town centre offices has reduced retail footfall in town centres. 	The changes are likely to exacerbate existing trends, which the LDP Deposit Plan has sought to address. Changes are unlikely to be at such a level that they affect the Retail Hierarchy. Specific amendments to Retail frontages and the general retail policies will be developed as Focussed Changes. The Monitoring Framework sets out indicators on Town Centres.	 Focussed Changes likely to be identified for specific retail frontages and in relation to the general retail policy to provide greater flexibility. The Monitoring Framework of the Plan already includes specific indicators on Town Centres.
SP15: Visitor Economy	 Visitor Economy Whilst the Visitor economy in Wales was impacted initially by the lock-down, the evidence since July has been of higher than typical visitor numbers to Pembrokeshire. The long- term impacts will in part depend on the severity of the second wave of the virus and whether businesses are able to benefit in the short/medium 	Updates to the evidence base will be assessed and any Focussed Changes required to general policies considered. The strategic policy is considered sufficiently flexible and therefore amendment is not proposed.	 Potential Focussed Changes to general tourism policies if identified as necessary by evidence base updates.

Strategic Policy	Potential Covid-19 Impacts	PCC mitigation	Approach/ Action required
	 term from increased demand for UK holidays. This criteria policy seeks to ensure that proposals for the Visitor Economy are in appropriate locations, contribute to the diversity and quality of offer and both respect and protect the natural and built environment and surrounding communities. It accords with PPW and helps deliver Building Better Places action on Reawakening Wales' tourism and cultural sectors. 		
SP16: Minerals	 Minerals – No impact. This is a criteria based policy, which sets out a framework for the general minerals policies. . 	Whilst fluctuations in construction demand may affect the minerals market as a whole, the policy provides a flexible framework for varying economic circumstances – no amendments are considered necessary to the policy as a result of Covid-19.	 No Focussed Changes to this policy anticipated. A Sub- Regional Statement of Collaboration will be produced, once the RTS 2nd Review is finalised.

Strategic Policy	Potential Covid-19 Impacts	PCC mitigation	Approach/ Action required
		A Sub Regional Statement of Collaboration will support the Regional Technical Statement 2nd Review close to publication and once finalised.	
SP17: Welsh Language	No Impact. This is a criteria policy, which seeks to protect the Welsh language. It accords with PPW and helps deliver Building Better Places action on Reawakening Wales' tourism and cultural sectors.	None.	None.
SP18: Transport Infrastructure and Accessibility	No Impact. This is a criteria based policy, which seeks to support improvements to transport infrastructure and accessibility, including Active Travel schemes. It accords with PPW and helps deliver Building Better Places action on Active travel: exercise and rediscovered transport methods. The Covid-19 lockdown led to significantly reduced longer- distance travel, but at the same time a focus on shorter distance	No changes to this policy are considered necessary. The policy supports improvements to transport infrastructure, particularly those involving sustainable travel modes.	None.

Strategic Policy	Potential Covid-19 Impacts	PCC mitigation	Approach/ Action required
	functional and recreational travel and a renewed interest in some elements of sustainable travel (particularly walking and cycling). Public transport usage has, however, been badly affected by the Covid-19 pandemic, as vehicles are seen as high-risk environments for spread of the virus. It is too early to be certain of the long-term trends in this topic area.		
SP19: Waste Prevention and Management	No Impact. This criteria policy is not impacted by Covid-19 but will support waste prevention and management. Covid-19 has affected some aspects of waste management (for instance the way that local waste and recycling centres operate) but doorstep collection of source-segregated waste streams has continued throughout the pandemic. The principles that underpin waste prevention and management have not changed.	None.	None.