



Yn dilyn ymgynghoriad ar y Cynllun Datblygu Lleol Adneuo 2 (CDL2), mae Cyngor Sir Penfro yn cynnig rhywfaint o 'Newidiadau Canolbwyntiedig.' Hoffem glywed eich barn ar y rhain.

Dylid defnyddio'r ffurflen hon ar gyfer yr holl sylwadau (h.y. sylwadau neu wrthwynebiadau). Mae fersiynau electronig a nodiadau cyfarwyddyd ar gael ar <https://www.sir-benfro.gov.uk/adolygur-cynllun-datblygu-lleol/newidiadau-canolbwyntiedig> Os ydych yn cyflwyno copi ar bapur, dylech atodi tudalennau ychwanegol lle bod angen.

Sylwer bod rhaid i sylwadau berthyn i'r Newidiadau â Ffocws arfaethedig yn unig, ac nid i agweddau eraill ar y Cynllun Datblygu Lleol ar Adnau.

Mae gan y ffurflen hon ddwy ran: Rhan A (Manylion Personol) a Rhan B (Eich sylw). Sylwer y bydd Rhan B ar gael i'r cyhoedd a chaiff ei hanfon at yr Arolygiaeth Gynllunio.

Mae'n rhaid derbyn eich sylwadau erbyn 15 Medi 2025. Dychwelwch y ffurflenni at: ldp@pembrokeshire.gov.uk neu

Y Tîm Cynlluniau Datblygu, Neuadd y Sir, Freeman's Way, Hwlfordd, Sir Benfro, SA61 1TP

Following consultation on the Deposit Local Development Plan 2 (LDP2), Pembrokeshire County Council is proposing some 'Focussed Changes'. We would like your views on these.

This form should be used for all representations (i.e. comments or objections). Electronic versions and guidance notes are available at <https://www.pembrokeshire.gov.uk/local-development-plan-review/focused-changes> If you are submitting a paper copy, attach additional sheets as necessary.

Please note that representations must relate only to the proposed Focussed Changes, and not to other aspects of the Deposit LDP.

This form has two parts: Part A (Personal details) and Part B (Your representation). Please note that Part B will be made publicly available and will be forwarded to the Planning Inspectorate.

Your representations must be received by 15th September 2025. Please return forms to: LDP@pembrokeshire.gov.uk or The Development Plans Team, County Hall, Freeman's Way, Haverfordwest, Pembrokeshire SA61 1TP

RHAN A: Manylion cysylltu

PART A: Contact details

Eich manylion/manylion eich cleient

Your / your client's details

Manylion yr asiant (os ydynt yn berthnasol)

Agent's details (if relevant)

Enw
Name

Teitl swydd (lle y bo'n berthnasol)
Job title (where relevant)

Sefydliad (lle y bo'n berthnasol)
Organisation (where relevant)

Cyfeiriad
Address



Rhif ffôn Telephone no		
E-bost Email address		
Llofnodwyd Signed		
Dyddiad Date	10 September 2025	

RHAN B: Eich sylw

PART B: Your representation

Eich enw / sefydliad Your name / organisation	Welsh Government Place Division, Housing and Regeneration Directorate
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1. Pa newidiadau canolbwyntiedig rydych yn rhoi sylwadau arnynt?

1. Which Focussed Changes are you commenting on?

Cyfeirnod(au) y Newidiadau Canolbwyntiedig Focussed Change reference number(s)	FC5.GN02.02
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2. Cyn i chi esbonio eich sylwadau'n fanwl, byddai'n dda gwybod p'un a gredwch, o ganlyniad i'r Newidiadau Canolbwyntiedig, fod y Cynllun yn gadarn ai peidio, neu a ydych o'r farn bod rhannau ohono neu bob rhan ohono'n ansad a bod angen ei newid.

I gael rhagor o wybodaeth am gadernid a gofynion gweithdrefnol, gweler y nodiadau cyfarwyddyd. Os ydych yn ansicr, gadewch yr adran hon yn wag.

2. Before you set out your comments in detail, it would be helpful to know whether you think that, as a result of the Focussed Changes, the Plan is sound or that all or parts of it are unsound.

For more information on soundness and procedural requirements, see the guidance notes. If you are unsure, leave this section blank.

Rwyf o'r farn bod y CDLI yn gadarn I think the LDP is sound	
Rwyf o'r farn nad yw'r CDLI yn gadarn ac y dylid ei newid I think the LDP is unsound and should be changed	X



3. Rhestrwch eich sylwadau isod.

Esboniwch pam rydych yn gwrthwynebu neu'n cefnogi'r Newidiadau Canolbwyntiedig a nodir. Lle bo'n bosibl, nodwch pa newidiadau sydd eu hangen i wneud y Cynllun Datblygu Lleol yn gadarn. Dylech gynnwys yr holl wybodaeth, tystiolaeth a gwybodaeth ategol sy'n angenrheidiol i gefnogi eich sylw. Bydd hyn yn helpu'r Awdurdod a'r Arolygydd i ddeall y materion y byddwch yn eu codi. Dim ond os bydd yr Arolygydd yn eich gwahodd i fynd i'r afael â materion y bydd yn eu codi y byddwch yn gallu cyflwyno rhagor o wybodaeth i'r archwiliad.

3. Please set out your comments below.

Explain why you object to or support the identified Focussed Changes. Where possible, identify what changes are needed to make the LDP sound. Include all the information, evidence and supporting information necessary to support your representation. This will help the Authority and the Inspector to understand the issues you raise. You will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise.

Whilst we welcome the inclusion of reference to the circular economy principles within Policy GN02, we do not consider that this Focused Change has adequately addressed the concerns detailed in our previous representation. In particular, the policy still fails to provide any guidance in respect of the use of "local and sustainable construction materials" (criterion 3). We maintain our previous concern that:

1. Limiting the source location of materials to the local area is likely to be unsustainable in itself and is not justified in the supporting text or evidence base.
2. Reference to "local and sustainable construction materials" is neither precise nor measurable.
3. Limiting the source location of materials to the local area is likely to be unsustainable in itself and is not justified in the supporting text or evidence base.

Given that reference is now made to the circular economy, we do not consider it necessary to include reference to the use of "local and sustainable construction materials" as drafted. Furthermore, any such reference should be acknowledged as being undertaken on a project-by-project basis, subject to viability.

We further consider that additional consideration should be given to the potential conflict between this policy requirement and current requirements in respect of Subsidy Control (State Aid). The requirement for construction materials to be sourced from within the (undefined) local area has the potential to distort competition at a regional and/or national level this putting some suppliers at an unfair advantage. This could give rise to questions as to whether the Council's action (a public body) in this regard amounts to a financial Subsidy to Local firms and falls foul of UK Subsidy Control Regulation. [UK subsidy control regime - GOV.UK](https://www.gov.uk/guidance/uk-subsidy-control-regime)

Ticiwch yma os ydych yn cyflwyno rhagor o ddeunydd i gefnogi eich sylw.

Tick here if you are submitting additional material to support your representation.

5. Os ydych yn gwrthwynebu Newid Canolbwyntiedig neu ydych chi eisiau siarad mewn sesiwn gwrandawriad yr Archwiliad cyhoeddus?



Ar y cam hwn, gallwch wneud sylwadau'n ysgrifenedig yn unig (gelwir y rhain yn 'sylwadau ysgrifenedig'). Fodd bynnag, gall pawb sydd am newid y Cynllun ymddangos gerbron yr Arolygydd a siarad mewn 'sesiwn gwrandawriad' yn ystod yr Archwiliad cyhoeddus. Ond dylech gofio y bydd yr Arolygydd yn rhoi'r un pwys ar eich sylwadau ysgrifenedig ar y ffurflen hon â'r rheiny a wneir ar lafar mewn sesiwn gwrandawriad. Sylwer, bydd yr Arolygydd yn pennu'r weithdrefn fwyaf priodol er mwyn darparu ar gyfer y rhai sydd eisiau rhoi tystiolaeth lafar.

5. If you are objecting to a Focussed Change, do you want to speak at a hearing session of the public examination?

At this stage, you can only make comments in writing (these are called 'written representations'). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please note that the Inspector will determine the most appropriate procedure for accommodating those who want to provide oral evidence.

Nid wyf am siarad mewn sesiwn gwrandawriad ac rwyf yn fodlon i'm sylwadau ysgrifenedig gael eu hystyried gan yr Arolygydd.

I do not want to speak at a public hearing and am happy for my written representations to be considered by the Inspector.

X

Rwyf am siarad mewn sesiwn gwrandawriad.

I want to speak at a public hearing.

Os ydych chi eisiau cyfranogi mewn gwrandawriad, nodwch isod ynglŷn â beth rydych chi eisiau siarad (e.e. 'Safle tai ym Mhen y Graig' neu 'Y targed tai cyffredinol').

If you want to participate in a hearing, indicate below what you want to speak about (e.g. 'Housing site at Pen y Graig' or 'The overall housing target').

6. Os ydych am siarad, byddai'n ddefnyddiol pe gallech nodi ym mha iaith hoffech chi gael eich clywed.

6. If you wish to speak, it would be helpful if you could indicate in which language you would like to be heard.

Hoffwn i gael fy nghlywed yn Gymraeg.

I wish to be heard in Welsh.

Hoffwn i gael fy nghlywed yn Saesneg.

I wish to be heard in English.



Nodiadau cyfarwyddyd

Guidance notes

*Bydd Cynllun Datblygu Lleol 2 (CDL2) Cyngor Sir Penfro yn cael ei archwilio gan Arolygydd annibynnol a benodir gan Lywodraeth Cymru. Gwaith yr Arolygydd yw ystyried a yw'r Cynllun yn bodloni **gofynion gweithdrefnol** ac a yw'n **gadarn**.*

Gellir ystyried 'Cadarn' yn y cyd-destun hwn o fewn ei ystyr arferol o 'dangos barnu da' a 'gellir ymddiried ynddo'. Y cwestiynau neu'r 'profion' y bydd yr Arolygydd yn eu hystyried wrth benderfynu a yw'r Cynllun yn gadarn yw:

- 1. A yw'r cynllun yn ffitio? (h.y. a yw'n gyson â chynlluniau eraill?)*
- 2. A yw'r cynllun yn briodol? (h.y. a yw'n briodol ar gyfer yr ardal yng ngoleuni'r dystiolaeth?)*
- 3. A fydd y cynllun yn cyflawni? (h.y. a yw'n debygol o fod yn effeithiol?)*

Darperir rhagor o wybodaeth am y profion cadernid a'r gofynion gweithdrefnol yn Arweiniad Gweithdrefnol ar Archwiliadau Cynllun Datblygu Lleol yr Arolygiaeth Gynllunio.

Yn dilyn ymgynghoriad ar fersiwn Cynllun Adneuo 2 o Gynllun Datblygu Lleol 2, mae Cyngor Sir Penfro yn gwneud nifer gyfyngedig o 'newidiadau â ffocws' i wneud y Cynllun yn gadarn cyn ei archwilio. Ymgynghorir ar y newidiadau hyn cyn bod yr archwiliad yn dechrau. Caiff unrhyw ymatebon eu hanfon ymlaen yn uniongyrchol at yr Arolygydd Cynllunio.

Os ydych yn gwrthwynebu Newid Canolbwytiedig, dylech ddweud pam mae'n peri i'r Cynllun fod yn ansad a sut dylid newid y Newid Canolbwytiedig er mwyn gwneud y Cynllun yn gadarn.

Lle rydych yn cynnig newid i 'r Newid Canolbwytiedig byddai'n ddefnyddiol egluro pa brawf (profion) cadernid rydych yn credu ei

The Pembrokeshire County Council Local Development Plan 2 (LDP2) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound.

'Sound' may be considered in this context within its ordinary meaning of 'showing good judgement' and 'able to be trusted'. The questions or 'tests' which the Inspector will consider in deciding whether the Plan is sound are:

1. Does the plan fit? (i.e. is it consistent with other plans?)
2. Is the plan appropriate? (i.e. is it appropriate for the area in the light of the evidence?)
3. Will the plan deliver? (i.e. is it likely to be effective?)

More information on the soundness tests and procedural requirements is provided in the Planning Inspectorate's LDP Examinations Procedural Guidance.

Having consulted on the Deposit Plan 2 version of LDP2, Pembrokeshire County Council is making a limited number of 'Focussed Changes' to make the Plan sound before it is examined. These changes are being consulted upon before the examination starts. Any responses will be forwarded directly to the Planning Inspector.

If you are objecting to a Focussed Change, you should say why you think it makes the Plan unsound, and how the Focussed Change should be changed to make the Plan sound.

Where you propose a change to a Focussed Change it would be helpful to make clear which test(s) of soundness you believe it fails. Failing to identify a test will not mean that your comments will not be considered, providing it relates to the Focussed Changes. You should



fod yn eu methu. Fydd methu adnabod prawf ddim yn golygu na chaiff eich sylwadau eu hystyried, cyhyd â'i fod yn perthyn i'r Newidiadau Canolbwyntiedig. Dylech gynnwys eich holl sylwadau ar y ffurflen, gan ddefnyddio dogfennau ychwanegol a thystiolaeth ategol lle bod angen.

Os ydych yn ceisio mwy nag un newid i'r Cynllun, nid yw bob amser yn angenrheidiol llenwi ffurflenni ar wahân ar gyfer pob rhan o'ch sylw. Gall fod, fodd bynnag, yn ddefnyddiol defnyddio dwy ffurflen ar wahân os ydych yn dymuno siarad mewn gwrandawriad am rai gwrthwynebiadau ond nid rhai eraill.

Pan fydd grŵp yn rhannu barn gyffredin ar sut mae'n dymuno i'r Cynllun gael ei newid, byddai'n ddefnyddiol i'r grŵp hwnnw anfon ffurflen unigol gyda'u sylwadau, yn hytrach na bod nifer fawr o unigolion yn anfon ffurflenni ar wahân yn ailadrodd yr un pwynt. Mewn achosion o'r fath, dylai'r grŵp nodi faint o bobl mae'n eu cynrychioli a sut gafodd y sylw ei awdurdodi. Dylid adnabod cynrychiolydd y grŵp (neu'r prif ymarferydd) yn glir.

include all your comments on the form, using accompanying documents and supporting evidence where necessary.

If you seek more than one change to the Plan, it is not always necessary to complete separate forms for each part of your representation. It may, however, be helpful to use two separate forms if you wish to speak at a hearing about some objections but not others.

Where a group shares a common view on how it wishes the Plan to be changed, it would be helpful for that group to send a single form with their comments, rather than for a large number of individuals to send in separate forms repeating the same point. In such cases the group should indicate how many people it is representing and how the representation has been authorised. The group's representative (or chief petitioner) should be clearly identified.



Yn dilyn ymgynghoriad ar y Cynllun Datblygu Lleol Adneuo 2 (CDL2), mae Cyngor Sir Penfro yn cynnig rhywfaint o 'Newidiadau Canolbwyntiedig.' Hoffem glywed eich barn ar y rhain.

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Sylwer bod rhaid i sylwadau berthyn i'r Newidiadau â Ffocws arfaethedig yn unig, ac nid i agweddau eraill ar y Cynllun Datblygu Lleol ar Adnau.

Mae gan y ffurflen hon ddwy ran: Rhan A (Manylion Personol) a Rhan B (Eich sylw). Sylwer y bydd Rhan B ar gael i'r cyhoedd a chaiff ei hanfon at yr Arolygiaeth Gynllunio.

Mae'n rhaid derbyn eich sylwadau erbyn 15 Medi 2025. Dychwelwch y ffurflenni at: ldp@pembrokeshire.gov.uk neu

Y Tîm Cynlluniau Datblygu, Neuadd y Sir, Freeman's Way, Hwlfordd, Sir Benfro, SA61 1TP

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Please note that representations must relate only to the proposed Focussed Changes, and not to other aspects of the Deposit LDP.

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Your representations must be received by 15th September 2025. Please return forms to: LDP@pembrokeshire.gov.uk or The Development Plans Team, County Hall, Freeman's Way, Haverfordwest, Pembrokeshire SA61 1TP

RHAN A: Manylion cysylltu

PART A: Contact details

Eich manylion/manylion eich cleient

Your / your client's details

Manylion yr asiant (os ydynt yn berthnasol)

Agent's details (if relevant)

Enw
Name

Teitl swydd (lle y bo'n berthnasol)

Job title (where relevant)

Sefydliad (lle y bo'n berthnasol)
Organisation (where relevant)

Cyfeiriad
Address



Rhif ffôn Telephone no		
E-bost Email address		
Llofnodwyd Signed		
Dyddiad Date	10 September 2025	

RHAN B: Eich sylw

PART B: Your representation

Eich enw / sefydliad Your name / organisation	Welsh Government Place Division, Housing and Regeneration Directorate
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1. Pa newidiadau canolbwyntiedig rydych yn rhoi sylwadau arnynt?

1. Which Focussed Changes are you commenting on?

Cyfeirnod(au) y Newidiadau Canolbwyntiedig Focussed Change reference number(s)	FC5.GN15.01 FC5.GN15.02
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2. Cyn i chi esbonio eich sylwadau'n fanwl, byddai'n dda gwybod p'un a gredwch, o ganlyniad i'r Newidiadau Canolbwyntiedig, fod y Cynllun yn gadarn ai peidio, neu a ydych o'r farn bod rhannau ohono neu bob rhan ohono'n ansad a bod angen ei newid.

I gael rhagor o wybodaeth am gadernid a gofynion gweithdrefnol, gweler y nodiadau cyfarwyddyd. Os ydych yn ansicr, gadewch yr adran hon yn wag.

2. Before you set out your comments in detail, it would be helpful to know whether you think that, as a result of the Focussed Changes, the Plan is sound or that all or parts of it are unsound.

For more information on soundness and procedural requirements, see the guidance notes. If you are unsure, leave this section blank.

Rwyf o'r farn bod y CDLI yn gadarn I think the LDP is sound	
Rwyf o'r farn nad yw'r CDLI yn gadarn ac y dylid ei newid I think the LDP is unsound and should be changed	X



3. Rhestrwch eich sylwadau isod.

Esboniwch pam rydych yn gwrthwynebu neu'n cefnogi'r Newidiadau Canolbwyntiedig a nodir. Lle bo'n bosibl, nodwch pa newidiadau sydd eu hangen i wneud y Cynllun Datblygu Lleol yn gadarn. Dylech gynnwys yr holl wybodaeth, tystiolaeth a gwybodaeth ategol sy'n angenrheidiol i gefnogi eich sylw. Bydd hyn yn helpu'r Awdurdod a'r Arolygydd i ddeall y materion y byddwch yn eu codi. Dim ond os bydd yr Arolygydd yn eich gwahodd i fynd i'r afael â materion y bydd yn eu codi y byddwch yn gallu cyflwyno rhagor o wybodaeth i'r archwiliad.

3. Please set out your comments below.

Explain why you object to or support the identified Focussed Changes. Where possible, identify what changes are needed to make the LDP sound. Include all the information, evidence and supporting information necessary to support your representation. This will help the Authority and the Inspector to understand the issues you raise. You will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise.

We note that some changes have been made to the supporting text to Policy GN15 but are concerned that no changes have been made to Criteria B or C in accordance with the comments set out in our previous representations. By way of summary:

1. Criterion B of the policy seeks an "appropriate mix" of housing types, tenures and sizes but does not provide any basis by which such an "appropriate mix" might be identified and controlled. The supporting text refers to the LHMA but the lack of reference to this in the policy itself limits the extent to which the Council might be able to ensure compliance. Furthermore, restricting any consideration of housing mix to the LHMA (prepared in 2021) would also base it at a point in time and so may not reflect the prevailing conditions at the time of determination of a planning application.
2. As presently drafted Criterion C appears to seek a mix of residential use types e.g. secondary and short-term as part of any residential development. We consider that this criterion would benefit from redrafting to ensure greater clarity to control short term lets and second homes and define what is meant by 'appropriate mix'.

Ticiwch yma os ydych yn cyflwyno rhagor o ddeunydd i gefnogi eich sylw.

Tick here if you are submitting additional material to support your representation.

5. Os ydych yn gwrthwynebu Newid Canolbwyntiedig neu ydych chi eisiau siarad mewn sesiwn gwrandawriad yr Archwiliad cyhoeddus?

Ar y cam hwn, gallwch wneud sylwadau'n ysgrifenedig yn unig (gelwir y rhain yn 'sylwadau ysgrifenedig'). Fodd bynnag, gall pawb sydd am newid y Cynllun ymddangos gerbron yr Arolygydd a siarad mewn 'sesiwn gwrandawriad' yn ystod yr Archwiliad cyhoeddus. Ond dylech gofio y bydd yr Arolygydd yn rhoi'r un pwys ar eich sylwadau ysgrifenedig ar y ffurflen hon â'r rheiny a wneir ar lafar mewn sesiwn gwrandawriad. Sylwer, bydd yr Arolygydd yn pennu'r weithdrefn fwyaf priodol er mwyn darparu ar gyfer y rhai sydd eisiau rhoi tystiolaeth lafar.

5. If you are objecting to a Focussed Change, do you want to speak at a hearing session of the public examination?



<p>At this stage, you can only make comments in writing (these are called 'written representations'). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please note that the Inspector will determine the most appropriate procedure for accommodating those who want to provide oral evidence.</p>	
<p><i>Nid wyf am siarad mewn sesiwn gwrandawriad ac rwyf yn fodlon i'm sylwadau ysgrifenedig gael eu hystyried gan yr Arolygydd.</i> I do not want to speak at a public hearing and am happy for my written representations to be considered by the Inspector.</p>	X
<p><i>Rwyf am siarad mewn sesiwn gwrandawriad.</i> I want to speak at a public hearing.</p>	
<p><i>Os ydych chi eisiau cyfranogi mewn gwrandawriad, nodwch isod ynglŷn â beth rydych chi eisiau siarad (e.e. 'Safle tai ym Mhen y Graig' neu 'Y targed tai cyffredinol').</i> If you want to participate in a hearing, indicate below what you want to speak about (e.g. 'Housing site at Pen y Graig' or 'The overall housing target').</p>	
<p>6. Os ydych am siarad, byddai'n ddefnyddiol pe gallech nodi ym mha iaith hoffech chi gael eich clywed. 6. If you wish to speak, it would be helpful if you could indicate in which language you would like to be heard.</p>	
<p><i>Hoffwn i gael fy nghlywed yn Gymraeg.</i> I wish to be heard in Welsh.</p>	
<p><i>Hoffwn i gael fy nghlywed yn Saesneg.</i> I wish to be heard in English.</p>	



Nodiadau cyfarwyddyd

Guidance notes

*Bydd Cynllun Datblygu Lleol 2 (CDL2) Cyngor Sir Penfro yn cael ei archwilio gan Arolygydd annibynnol a benodir gan Lywodraeth Cymru. Gwaith yr Arolygydd yw ystyried a yw'r Cynllun yn bodloni **gofynion gweithdrefnol** ac a yw'n **gadarn**.*

Gellir ystyried 'Cadarn' yn y cyd-destun hwn o fewn ei ystyr arferol o 'dangos barnu da' a 'gellir ymddiried ynddo'. Y cwestiynau neu'r 'profion' y bydd yr Arolygydd yn eu hystyried wrth benderfynu a yw'r Cynllun yn gadarn yw:

- 1. A yw'r cynllun yn ffitio? (h.y. a yw'n gyson â chynlluniau eraill?)*
- 2. A yw'r cynllun yn briodol? (h.y. a yw'n briodol ar gyfer yr ardal yng ngoleuni'r dystiolaeth?)*
- 3. A fydd y cynllun yn cyflawni? (h.y. a yw'n debygol o fod yn effeithiol?)*

Darperir rhagor o wybodaeth am y profion cadernid a'r gofynion gweithdrefnol yn Arweiniad Gweithdrefnol ar Archwiliadau Cynllun Datblygu Lleol yr Arolygiaeth Gynllunio.

Yn dilyn ymgynghoriad ar fersiwn Cynllun Adneuo 2 o Gynllun Datblygu Lleol 2, mae Cyngor Sir Penfro yn gwneud nifer gyfyngedig o 'newidiadau â ffocws' i wneud y Cynllun yn gadarn cyn ei archwilio. Ymgynghorir ar y newidiadau hyn cyn bod yr archwiliad yn dechrau. Caiff unrhyw ymatebon eu hanfon ymlaen yn uniongyrchol at yr Arolygydd Cynllunio.

Os ydych yn gwrthwynebu Newid Canolbwytiedig, dylech ddweud pam mae'n peri i'r Cynllun fod yn ansad a sut dylid newid y Newid Canolbwytiedig er mwyn gwneud y Cynllun yn gadarn.

Lle rydych yn cynnig newid i 'r Newid Canolbwytiedig byddai'n ddefnyddiol egluro pa brawf (profion) cadernid rydych yn credu ei

The Pembrokeshire County Council Local Development Plan 2 (LDP2) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound.

'Sound' may be considered in this context within its ordinary meaning of 'showing good judgement' and 'able to be trusted'. The questions or 'tests' which the Inspector will consider in deciding whether the Plan is sound are:

1. Does the plan fit? (i.e. is it consistent with other plans?)
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More information on the soundness tests and procedural requirements is provided in the Planning Inspectorate's LDP Examinations Procedural Guidance.

Having consulted on the Deposit Plan 2 version of LDP2, Pembrokeshire County Council is making a limited number of 'Focussed Changes' to make the Plan sound before it is examined. These changes are being consulted upon before the examination starts. Any responses will be forwarded directly to the Planning Inspector.

If you are objecting to a Focussed Change, you should say why you think it makes the Plan unsound, and how the Focussed Change should be changed to make the Plan sound.

Where you propose a change to a Focussed Change it would be helpful to make clear which test(s) of soundness you believe it fails. Failing to identify a test will not mean that your comments will not be considered, providing it relates to the Focussed Changes. You should



fod yn eu methu. Fydd methu adnabod prawf ddim yn golygu na chaiff eich sylwadau eu hystyried, cyhyd â'i fod yn perthyn i'r Newidiadau Canolbwyntiedig. Dylech gynnwys eich holl sylwadau ar y ffurflen, gan ddefnyddio dogfennau ychwanegol a thystiolaeth ategol lle bod angen.

Os ydych yn ceisio mwy nag un newid i'r Cynllun, nid yw bob amser yn angenrheidiol llenwi ffurflenni ar wahân ar gyfer pob rhan o'ch sylw. Gall fod, fodd bynnag, yn ddefnyddiol defnyddio dwy ffurflen ar wahân os ydych yn dymuno siarad mewn gwrandawriad am rai gwrthwynebiadau ond nid rhai eraill.

Pan fydd grŵp yn rhannu barn gyffredin ar sut mae'n dymuno i'r Cynllun gael ei newid, byddai'n ddefnyddiol i'r grŵp hwnnw anfon ffurflen unigol gyda'u sylwadau, yn hytrach na bod nifer fawr o unigolion yn anfon ffurflenni ar wahân yn ailadrodd yr un pwynt. Mewn achosion o'r fath, dylai'r grŵp nodi faint o bobl mae'n eu cynrychioli a sut gafodd y sylw ei awdurdodi. Dylid adnabod cynrychiolydd y grŵp (neu'r prif ymarferydd) yn glir.

include all your comments on the form, using accompanying documents and supporting evidence where necessary.

If you seek more than one change to the Plan, it is not always necessary to complete separate forms for each part of your representation. It may, however, be helpful to use two separate forms if you wish to speak at a hearing about some objections but not others.

Where a group shares a common view on how it wishes the Plan to be changed, it would be helpful for that group to send a single form with their comments, rather than for a large number of individuals to send in separate forms repeating the same point. In such cases the group should indicate how many people it is representing and how the representation has been authorised. The group's representative (or chief petitioner) should be clearly identified.



Yn dilyn ymgynghoriad ar y Cynllun Datblygu Lleol Adneuo 2 (CDL2), mae Cyngor Sir Penfro yn cynnig rhywfaint o 'Newidiadau Canolbwyntiedig.' Hoffem glywed eich barn ar y rhain.

Dylid defnyddio'r ffurflen hon ar gyfer yr holl sylwadau (h.y. sylwadau neu wrthwynebiadau). Mae fersiynau electronig a nodiadau cyfarwyddyd ar gael ar <https://www.sir-benfro.gov.uk/adolygur-cynllun-datblygu-lleol/newidiadau-canolbwyntiedig> Os ydych yn cyflwyno copi ar bapur, dylech atodi tudalennau ychwanegol lle bod angen.

Sylwer bod rhaid i sylwadau berthyn i'r Newidiadau â Ffocws arfaethedig yn unig, ac nid i agweddau eraill ar y Cynllun Datblygu Lleol ar Adnau.

Mae gan y ffurflen hon ddwy ran: Rhan A (Manylion Personol) a Rhan B (Eich sylw). Sylwer y bydd Rhan B ar gael i'r cyhoedd a chaiff ei hanfon at yr Arolygiaeth Gynllunio.

Mae'n rhaid derbyn eich sylwadau erbyn 15 Medi 2025. Dychwelwch y ffurflenni at: ldp@pembrokeshire.gov.uk neu

Y Tîm Cynlluniau Datblygu, Neuadd y Sir, Freeman's Way, Hwlfordd, Sir Benfro, SA61 1TP

Following consultation on the Deposit Local Development Plan 2 (LDP2), Pembrokeshire County Council is proposing some 'Focussed Changes'. We would like your views on these.

This form should be used for all representations (i.e. comments or objections). Electronic versions and guidance notes are available at <https://www.pembrokeshire.gov.uk/local-development-plan-review/focused-changes> If you are submitting a paper copy, attach additional sheets as necessary.

Please note that representations must relate only to the proposed Focussed Changes, and not to other aspects of the Deposit LDP.

This form has two parts: Part A (Personal details) and Part B (Your representation). Please note that Part B will be made publicly available and will be forwarded to the Planning Inspectorate.

Your representations must be received by 15th September 2025. Please return forms to: LDP@pembrokeshire.gov.uk or The Development Plans Team, County Hall, Freeman's Way, Haverfordwest, Pembrokeshire SA61 1TP

RHAN A: Manylion cysylltu

PART A: Contact details

Eich manylion/manylion eich cleient

Your / your client's details

Enw
Name

Teitl swydd (lle y bo'n berthnasol)
Job title (where relevant)

Sefydliad (lle y bo'n berthnasol)
Organisation (where relevant)

Cyfeiriad
Address

Manylion yr asiant (os ydynt yn berthnasol)

[Redacted area for contact details]



<i>Rhif ffôn</i> Telephone no	
<i>E-bost</i> Email address	
<i>Llofnodwyd</i> Signed	
<i>Dyddiad</i> Date	

RHAN B: Eich sylw

PART B: Your representation

<i>Eich enw / sefydliad</i> Your name / organisation	Welsh Government Place Division, Housing and Regeneration Directorate
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**1. Pa newidiadau canolbwyntiedig rydych yn rhoi sylwadau arnynt?
1. Which Focussed Changes are you commenting on?**

<i>Cyfeirnod(au) y Newidiadau Canolbwyntiedig</i> Focussed Change reference number(s)	FC5 GN16: Haverfordwest 01
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2. Cyn i chi esbonio eich sylwadau'n fanwl, byddai'n dda gwybod p'un a gredwch, o ganlyniad i'r Newidiadau Canolbwyntiedig, fod y Cynllun yn gadarn ai peidio, neu a ydych o'r farn bod rhannau ohono neu bob rhan ohono'n ansad a bod angen ei newid.

I gael rhagor o wybodaeth am gadernid a gofynion gweithdrefnol, gweler y nodiadau cyfarwyddyd. Os ydych yn ansicr, gadewch yr adran hon yn wag.

2. Before you set out your comments in detail, it would be helpful to know whether you think that, as a result of the Focussed Changes, the Plan is sound or that all or parts of it are unsound.

For more information on soundness and procedural requirements, see the guidance notes. If you are unsure, leave this section blank.

<i>Rwyf o'r farn bod y CDLI yn gadarn</i> I think the LDP is sound	
<i>Rwyf o'r farn nad yw'r CDLI yn gadarn ac y dylid ei newid</i> I think the LDP is unsound and should be changed	X



3. Rhestrwch eich sylwadau isod.

Esboniwch pam rydych yn gwrthwynebu neu'n cefnogi'r Newidiadau Canolbwyntiedig a nodir. Lle bo'n bosibl, nodwch pa newidiadau sydd eu hangen i wneud y Cynllun Datblygu Lleol yn gadarn. Dylech gynnwys yr holl wybodaeth, tystiolaeth a gwybodaeth ategol sy'n angenrheidiol i gefnogi eich sylw. Bydd hyn yn helpu'r Awdurdod a'r Arolygydd i ddeall y materion y byddwch yn eu codi. Dim ond os bydd yr Arolygydd yn eich gwahodd i fynd i'r afael â materion y bydd yn eu codi y byddwch yn gallu cyflwyno rhagor o wybodaeth i'r archwiliad.

3. Please set out your comments below.

Explain why you object to or support the identified Focussed Changes. Where possible, identify what changes are needed to make the LDP sound. Include all the information, evidence and supporting information necessary to support your representation. This will help the Authority and the Inspector to understand the issues you raise. You will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise.

We are pleased that PCC has removed reference to the requirement for 83% of homes at Slade Lane to be delivered as affordable properties. This was the result of an arithmetical error. We note that the affordable housing requirement is now proposed to be set at 50%. The justification for this figure is to:

"...reflect consented / proposed provision of affordable units on phases 1 and 2 of the development and the Welsh Government aspiration to build out subsequent phases based on a 50% affordable housing provision."

The Focused Change refers to the following levels of affordable housing delivery by phase:

"48.0 % phase 1, 52.0 % phase 2 and 50.0 % phase 3); Unit Number 5 165 (55 phase 1, 54 phase 2 and 56 phase 3)"

The figures that have been referenced in respect of phases 1 and 2 do not reflect our understanding, as detailed in our previous representation and repeated below:

1. Planning permission was granted in July 2019 (Reference: 18/1040/PA) for the development of 115 dwellings (including 42 affordable homes – 36.5%). Lovell has commenced construction in respect of this permission and the first homes will soon be occupied.
2. A planning application for the approval of Reserved Matters in respect of the second phase of development comprising of 103 dwellings (including 50% (52) affordable units) was submitted in August 2024 (Reference: 24/0497/PA).

With the exception of sites that are identified for 100% affordable housing, the requirement for Slade Lane is considerably higher than that which is specified for any of the other proposed allocations or unallocated sites (as detailed in Policy GN20). We further note that there is no evidence to support this level of affordable housing provision on the site. As set out in our previous representations, Slade Lane was not identified as one of the ten key sites listed in Appendix F of the viability assessment. This is a significant omission given its importance to the LDP strategy and future housing delivery in Pembrokeshire. Moreover, Slade Lane site is not comparable in size to any of the key sites or typologies that were considered by the viability assessment.



Viability evidence

For this reason, Welsh Government has commissioned Savills to undertake a viability assessment of the proposed development at Slade Lane, a copy of which is provided with these representations. This high-level assessment has been undertaken using the Burrows-Hutchinson Development Viability Model and is consistent in terms of the methodology and assumptions that have informed the assessment that was undertaken on behalf of PCC and forms the evidence base for LDP2. It applies site abnormal/infrastructure costs that were calculated by Cumming Group in January 2025 and all assumptions and inputs are reasonable in the context of the research set out in Lichfields' *Fine Margins* research into viability assessments in planning and plan-making.

The Savills report states:

"We note that the Council's Financial Viability Assessment (FVA) concluded that the highest level of affordable housing that can be viably delivered in any part of Pembrokeshire is 25%. However, the Deposit Plan Policy GN20 sets out a requirement for 30% affordable housing for sites in Band 3 that will deliver 100 or more houses. Accordingly, we have conducted appraisals at both 30% affordable provision (hereafter Option 1) and at 25% affordable provision (hereafter Option 2)."

It concludes that:

1. Option 1 is not capable of supporting a deliverable and viable development based on S106 financial obligations of £4,000 per unit; but that,
2. Option 2 can support a viable development, even when tested with a higher S106 obligation of £5,000 per unit.

Notwithstanding the fact that the viability assessment failed to review this important site, the Savills review endorses its findings that the highest level of affordable housing that can be viably delivered in any part of Pembrokeshire is 25%.

Against this context, we expressed concern in our previous representations that Policy GN20 sets out a requirement for 30% affordable housing for sites in Band 3 that will deliver 100 or more houses – a matter that raises questions regarding the translation of evidence to policy and more fundamental issues regarding the future deliverability of much-needed housing in Pembrokeshire. There is absolutely no suggestion that an 50% requirement could be sustained and no justification for the figure that the Council has set out.

Compliance with national policy position

As detailed above, PCC appears to justify its Focused Change in respect of Policy GN16 as being *"to reflect ... the Welsh Government aspiration to build out subsequent phases based on a 50% affordable housing provision."* We do not consider this to represent an adequate level or appropriate form of evidence. It would appear that PCC's sole justification is based on the landownership of the land and the previously stated position of Welsh Government in respect of the delivery of affordable housing. This position of having specific regard to the ownership of the land when setting affordable housing requirements is not consistent with the approach set out in the Development Plans Manual. The DPM requires policies to be informed by evidence that is relevant and proportionate. Whilst it is necessary to ensure that evidence is up-to-date, relates to the specific issues under consideration, appropriately detailed and specific to the area, there is no basis by which a local planning authority can have regard to the ambitions of a current landowner. Of much greater concern is the fact that, as set out above, PCC has not sought to



test the viability of development at Slade Lane. The LDP2 is therefore contrary to the requirements of the Development Plans Manual which states in paragraph 5.8.9 that:

"To support delivery of the plan, site specific viability appraisals should be undertaken for those sites which are key to delivering the plan (the size threshold can vary between LPAs). An appraisal will enable more detailed information to be taken into account having regard to the site specific details. The preferred approach is for this to be done in conjunction with a site promoter who has access to the detail, or conversely through more detailed modelling with site specific assumptions. Much more insight can be gained which can result in refined affordable housing targets, as opposed to the broader area identified in the high level appraisal. The two are not contradictory, rather the site specific being a refinement of the high level appraisal. This should be undertaken as early as possible." (Emphasis added)

At no point has PCC sought to engage with Welsh Government in respect of the viability of Slade Lane. Rather, it has published evidence that failed to consider the largest residential allocation as one of its key sites and has overlooked the repeated position of Welsh Government that the affordable housing requirements for this site should be consistent with that of other allocations.

In any event, PCC's position is based on a misinterpretation of the Welsh Government's position. Critically, there is no published Welsh Government policy in respect of the delivery of 50% affordable housing on all sites. *Future Wales – The National Plan 2040* recognises on page 72 that "the provision of affordable homes should become a key focus for housing delivery" and states that:

"...under the central estimate, that on average the estimated annual additional homes are split almost equally between affordable housing (social housing or intermediate rent) and market housing. This represents an average of approximately 3,500 (48%) affordable homes and 3,900 (52%) market homes per year over the five year period."

However, this does not relate to individual sites. Furthermore, any aspiration for the delivery of 50% affordable housing delivery on land owned and controlled by the Welsh Government represents a portfolio consideration, recognising that some sites will be developed entirely for affordable housing whilst in other locations, it might only be possible to achieve a policy-compliant level of provision.

The Savills viability report clearly demonstrates that 25% affordable housing is the maximum level of provision that can viably be delivered in this location. As set out above, this conclusion endorses that of the Council's own viability assessment. In the event that – notwithstanding the identified viability position – the Welsh Ministers conclude that the delivery of more affordable homes will bring advantages locally, they would be able to control this through the disposal strategy for the site. That, however, would be separate to the LDP process which must be based on a robust viability baseline.

Public sector accountability

Were PCC to require 50% affordable housing provision, it would threaten the viability and deliverability of its largest proposed allocation. That would undermine its ability to meet its housing requirement. Moreover, adopting a much higher affordable housing requirement for Slade Lane because of its ownership would raise significant concerns regarding the repercussions of such an action on social and affordable home distribution around the county. Such an action has the potential to fundamentally distort the availability and affordability of social and affordable homes to people in need within Pembrokeshire resulting in destabilised communities and family support structures.



The Well-being of Future Generations (Wales) Act 2015, with its seven pillar mandates that public bodies consider the long-term impact of their decisions on future generations, ensuring that actions taken today do not compromise the ability of future generations to meet their needs. In the context of the requirement for local planning authorities to prepare a local housing needs study to determine the level of affordable housing provision that is required, mandating a 50% affordable housing provision could result in an over-provision of affordable housing in this location and a corresponding under-provision elsewhere in Pembrokeshire. It could also restrict the delivery of much needed market housing in Haverfordwest. This could impact on individuals and families as they may be forced to leave their communities to take residence in affordable homes at Slade Lane because there has been a failure to deliver adequate levels of affordable housing in their local area. Conversely, such measures could also impact individuals and families seeking market homes in Haverfordwest for precisely the opposite reason; they would be forced to leave the area due to a lack of suitable market homes.

It is also in our opinion that this requirement of 50% affordable housing provision, effectively a distortion of the market by a public body, could be captured by UK Subsidy Control Regulations. [UK subsidy control regime - GOV.UK](https://www.gov.uk/guidance/uk-subsidy-control-regime) By mandating such a position (50% affordable) at Slade Lane the Council's action may project a financial benefit to other housing providers, particularly, the private sector, if they took advantage of the effective over-provision of affordable housing (compared to policy requirements) at Slade Lane and thereby argue for a reduced level of affordable housing provision on other sites. In addition, this action could also give rise to questions of PCC in respect of its policy advancing the profits of private organisations at the expense of Welsh public money.

Conclusion

By way of conclusion, the Welsh Government objects to the proposed 50% affordable housing requirement at Slade Lane on the grounds that:

1. It is not supported by any evidence;
2. It therefore fails to adhere to the requirements of the Development Plans Manual in respect of ensuring that plans are supported by a robust evidence base and that sites that are key to the delivery of the plan strategy are subject to viability testing;
3. The evidence undertaken on behalf of Welsh Government demonstrates that a maximum of 25% affordable housing can be achieved in this location;
4. The stated 50% figure would be substantially above that required for any other site in Pembrokeshire, save for those that are expected to deliver 100% affordable housing;
5. The sole justification for this level of affordable housing provision appears to be that the land is owned and controlled by Welsh Government;
6. There is no Welsh Government policy that specifically requires the provision of 50% affordable housing and statements relating to this represent a portfolio consideration and should not be interpreted as being site-specific;
7. Adoption of a differential approach based solely on the ownership of the land would raise significant concerns regarding subsidy control and public sector accountability on the use of public funds
8. The viability challenges arising would have the potential to undermine the deliverability of the largest proposed allocation in the LDP2; and,



9. The implication of this is that PCC would potentially not be able to achieve its identified housing requirement.

For these reasons, we do not consider the proposed change to Policy GN16 to be sound or acceptable. For the reasons set out above, it fails Tests of Soundness 2 (Is the plan appropriate? (i.e. is it appropriate for the area in the light of the evidence?)) and 3 (Will the plan deliver? (i.e. is it likely to be effective?)).

We are satisfied that the proposed development at Slade Lane is viable and deliverable and, in the absence of a specific consideration of this site in the viability assessment, we would be very keen to work with PCC at the earliest opportunity to ensure that the viability of this important site can be fully tested.

Ticiwch yma os ydych yn cyflwyno rhagor o ddeunydd i gefnogi eich sylw.

X

Tick here if you are submitting additional material to support your representation.

5. Os ydych yn gwrthwynebu Newid Canolbwyntiedig neu ydych chi eisiau siarad mewn sesiwn gwrandawriad yr Archwiliad cyhoeddus?

Ar y cam hwn, gallwch wneud sylwadau'n ysgrifenedig yn unig (gelwir y rhain yn 'sylwadau ysgrifenedig'). Fodd bynnag, gall pawb sydd am newid y Cynllun ymddangos gerbron yr Arolygydd a siarad mewn 'sesiwn gwrandawriad' yn ystod yr Archwiliad cyhoeddus. Ond dylech gofio y bydd yr Arolygydd yn rhoi'r un pwys ar eich sylwadau ysgrifenedig ar y ffurflen hon â'r rheiny a wneir ar lafar mewn sesiwn gwrandawriad. Sylwer, bydd yr Arolygydd yn pennu'r weithdrefn fwyaf priodol er mwyn darparu ar gyfer y rhai sydd eisiau rhoi tystiolaeth lafar.

5. If you are objecting to a Focussed Change, do you want to speak at a hearing session of the public examination?

At this stage, you can only make comments in writing (these are called 'written representations'). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please note that the Inspector will determine the most appropriate procedure for accommodating those who want to provide oral evidence.

Nid wyf am siarad mewn sesiwn gwrandawriad ac rwyf yn fodlon i'm sylwadau ysgrifenedig gael eu hystyried gan yr Arolygydd.

I do not want to speak at a public hearing and am happy for my written representations to be considered by the Inspector.

Rwyf am siarad mewn sesiwn gwrandawriad.

X

I want to speak at a public hearing.

Os ydych chi eisiau cyfranogi mewn gwrandawriad, nodwch isod ynglŷn â beth rydych chi eisiau siarad (e.e. 'Safle tai ym Mhen y Graig' neu 'Y targed tai cyffredinol').

If you want to participate in a hearing, indicate below what you want to speak about (e.g. 'Housing site at Pen y Graig' or 'The overall housing target').



6. Os ydych am siarad, byddai'n ddefnyddiol pe gallech nodi ym mha iaith hoffech chi gael eich clywed.

6. If you wish to speak, it would be helpful if you could indicate in which language you would like to be heard.

Hoffwn i gael fy nghlywed yn Gymraeg.

I wish to be heard in Welsh.

Hoffwn i gael fy nghlywed yn Saesneg.

I wish to be heard in English.

X



Nodiadau cyfarwyddyd

Guidance notes

*Bydd Cynllun Datblygu Lleol 2 (CDL2) Cyngor Sir Penfro yn cael ei archwilio gan Arolygydd annibynnol a benodir gan Lywodraeth Cymru. Gwaith yr Arolygydd yw ystyried a yw'r Cynllun yn bodloni **gofynion gweithdrefnol** ac a yw'n **gadarn**.*

Gellir ystyried 'Cadarn' yn y cyd-destun hwn o fewn ei ystyr arferol o 'dangos barnu da' a 'gellir ymddiried ynddo'. Y cwestiynau neu'r 'profion' y bydd yr Arolygydd yn eu hystyried wrth benderfynu a yw'r Cynllun yn gadarn yw:

- 1. A yw'r cynllun yn ffitio? (h.y. a yw'n gyson â chynlluniau eraill?)*
- 2. A yw'r cynllun yn briodol? (h.y. a yw'n briodol ar gyfer yr ardal yng ngoleuni'r dystiolaeth?)*
- 3. A fydd y cynllun yn cyflawni? (h.y. a yw'n debygol o fod yn effeithiol?)*

Darperir rhagor o wybodaeth am y profion cadernid a'r gofynion gweithdrefnol yn Arweiniad Gweithdrefnol ar Archwiliadau Cynllun Datblygu Lleol yr Arolygiaeth Gynllunio.

Yn dilyn ymgynghoriad ar fersiwn Cynllun Adneuo 2 o Gynllun Datblygu Lleol 2, mae Cyngor Sir Penfro yn gwneud nifer gyfyngedig o 'newidiadau â ffocws' i wneud y Cynllun yn gadarn cyn ei archwilio. Ymgynghorir ar y newidiadau hyn cyn bod yr archwiliad yn dechrau. Caiff unrhyw ymatebon eu hanfon ymlaen yn uniongyrchol at yr Arolygydd Cynllunio.

Os ydych yn gwrthwynebu Newid Canolbwytiedig, dylech ddweud pam mae'n peri i'r Cynllun fod yn ansad a sut dylid newid y Newid Canolbwytiedig er mwyn gwneud y Cynllun yn gadarn.

Lle rydych yn cynnig newid i 'r Newid Canolbwytiedig byddai'n ddefnyddiol egluro pa brawf (profion) cadernid rydych yn credu ei

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fod yn eu methu. Fydd methu adnabod prawf ddim yn golygu na chaiff eich sylwadau eu hystyried, cyhyd â'i fod yn perthyn i'r Newidiadau Canolbwyntiedig. Dylech gynnwys eich holl sylwadau ar y ffurflen, gan ddefnyddio dogfennau ychwanegol a thystiolaeth ategol lle bod angen.

Os ydych yn ceisio mwy nag un newid i'r Cynllun, nid yw bob amser yn angenrheidiol llenwi ffurflenni ar wahân ar gyfer pob rhan o'ch sylw. Gall fod, fodd bynnag, yn ddefnyddiol defnyddio dwy ffurflen ar wahân os ydych yn dymuno siarad mewn gwrandawriad am rai gwrthwynebiadau ond nid rhai eraill.

Pan fydd grŵp yn rhannu barn gyffredin ar sut mae'n dymuno i'r Cynllun gael ei newid, byddai'n ddefnyddiol i'r grŵp hwnnw anfon ffurflen unigol gyda'u sylwadau, yn hytrach na bod nifer fawr o unigolion yn anfon ffurflenni ar wahân yn ailadrodd yr un pwynt. Mewn achosion o'r fath, dylai'r grŵp nodi faint o bobl mae'n eu cynrychioli a sut gafodd y sylw ei awdurdodi. Dylid adnabod cynrychiolydd y grŵp (neu'r prif ymarferydd) yn glir.

include all your comments on the form, using accompanying documents and supporting evidence where necessary.

If you seek more than one change to the Plan, it is not always necessary to complete separate forms for each part of your representation. It may, however, be helpful to use two separate forms if you wish to speak at a hearing about some objections but not others.

Where a group shares a common view on how it wishes the Plan to be changed, it would be helpful for that group to send a single form with their comments, rather than for a large number of individuals to send in separate forms repeating the same point. In such cases the group should indicate how many people it is representing and how the representation has been authorised. The group's representative (or chief petitioner) should be clearly identified.

Viability Assessment

Slade Fields, Slade Lane, Haverfordwest



Viability Assessment

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Appendices

Appendix 1 – Concept Masterplan

Appendix 2 – Slade Fields 30% Affordable Appraisal Summary

Appendix 3 – Slade Fields 25% Affordable Appraisal Summary

Non-Technical Executive Summary

- This high level viability assessment has been submitted on behalf of the applicant, the Welsh Government, to assess the viability of the proposed development of Land at Slade Fields, Slade Lane, Haverfordwest, hereafter referred to as “the Site”.
- The Site lies within the defined Haverfordwest Settlement boundary and the majority of it is allocated in the Pembrokeshire Local Development Plan (LDP) 2013 – 2021 (Slade Lane South HSG/040/00274) for up to 512 units. The Council are in the process of a Replacement LDP, targeting adoption in May 2026 and this viability assessment is to support the Site to remain as an extended allocation and to assess the level of affordable housing provision and planning gain contributions that can be viably delivered.
- The technical assessment undertaken to date identifies that the Site is capable of accommodating up to c.551 units and we understand an outline planning permission is anticipated for submission in 2026. It is part of the wider allocation for up to c.1,010 units (LDP2 ref: HSG/040/LDP2/6) and progress has already commenced with Lovell/Pobl constructing Phase 1 (115 units) and a reserved matters approval has been submitted for Phase 2 (103 units), both located to the south western edge of the site.
- Overall, the Site has a total area of 70.10 acres (28.37 ha) with an estimated Net Developable Area (NDA) of 36.25 acres (14.67 ha). We have been provided with a scheme and masterplan for 551 units by Lichfields.
- We have undertaken appraisals using the Burrows-Hutchinson Development Viability Model (DVM) which is the Local Authorities preferred appraisal model to establish the viability of the proposed development.
- We note that the Council’s Financial Viability Assessment (FVA) concluded that the highest level of affordable housing that can be viably delivered in any part of Pembrokeshire is 25%. However, the Deposit Plan Policy GN20 sets out a requirement for 30% affordable housing for sites in Band 3 that will deliver 100 or more houses. Accordingly, we have conducted appraisals at both 30% affordable provision (hereafter Option 1) and at 25% affordable provision (hereafter Option 2).
- Our appraisals indicate that Option 1 is not capable of supporting a deliverable and viable development based on S106 financial obligations of £4,000 per unit. In contrast, Option 2 can support a viable development, even when tested with a higher S106 obligation of £5,000 per unit.
- Using an indicative housing mix of 2, 3 and 4 bedroom houses, our total GDV for the whole site at 25% affordable provision, equals **£128,233,607**.
- We have been provided with site abnormal/infrastructure costs as part of the viability assessment undertaken by Cumming Group which were calculated in January 2025.
- It is important to have regard to the date of this report, as any viability assessment represents a ‘snapshot’, and market conditions can change over a relatively short period of time.

1. RICS Compliance

1.1. RICS Professional Statement

This report has been prepared in accordance with the Royal Institution of Chartered Surveyors (RICS) professional statement entitled *Financial viability in planning: conduct and reporting* effective 1st September 2019.

The professional statement is mandatory in England only and whilst the subject of this viability assessment is located in Wales, as an RICS regulated firm we have complied with the guidance insofar as it is possible to do so in the context of the Welsh planning system.

1.2. Objectivity, Impartiality and Reasonableness

We confirm that this report has been prepared by a suitably qualified surveyor acting with objectivity, impartially, without interference and with reference to all appropriate available sources of information.

1.3. Confirmation of Instructions and Fees

We have been instructed to undertake this viability assessment by Welsh Government (the applicant) who is the landowner. No performance-related or contingent fees have been agreed.

1.4. Conflicts of Interest

Savills (UK) Limited has a material connection or involvement with the Property or any other parties. More particularly, we assisted Welsh Government in the acquisition of the Property and provided valuation advice in 2023. This notwithstanding you have provided Informed Consent to us in writing. Accordingly, we are reporting on an objective and unbiased basis.

We also are not advising the local planning authority in respect of any area-wide viability assessments.

In accordance with the RICS professional statement *Conflicts of Interest (1st edition, 2017)* we do not consider the above constitutes a conflict of interest and that in preparing this report, we are acting as objective and impartial advisers.

1.5. Information Sources

The extent of the due diligence enquiries we have undertaken and the sources of the information we have relied upon for the purpose of our viability assessment are stated in the relevant sections of our report below.

1.6. Publication and Responsibility

In accordance with the RICS professional statement this report has been prepared on the basis that it may be made publicly available.

Viability Assessment

Slade Fields, Slade Lane, Haverfordwest



This report is provided solely for the purpose stated above. It is for the use only of the party to whom it is addressed, and no responsibility is accepted to any third party for the whole or any part of its contents. Any such parties rely upon this report at their own risk.

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2. Savills

Savills is a highly respected property consultancy and agency business with over 700 offices worldwide and 40,000 staff. In the UK Savills have 140 offices with a London base and representation in all the major regional centres.

Savills' Cardiff office is the largest firm of chartered surveyors in Wales with a staff complement of 100 providing a range of property related services including development agency and consultancy, residential, investment and commercial agency, property management, planning consultancy and energy brokerage.

In recent years, Savills have been involved in a number of significant development projects across Wales, providing viability assessments to support planning applications and promotions throughout South and West Wales including a number of site promotions during plan review in Bridgend, Monmouthshire, Newport, Neath Port Talbot, RCT, Caerphilly, Vale of Glamorgan, Swansea and Torfaen Councils.

3. Site Description

The Site comprises several blocks of agricultural grazing land separated by mature hedgerows and some tree cover. The land is located to the north of Thomas Parry Way and to the west of the Slade Lane residential estate. The Site has mild topographical variation from north to south. There are no major existing buildings on site. While the majority of the land is permanent pasture, there is some mature wooded vegetation to the southern boundary acting as a buffer to Thomas Parry Way where the land is steeper and where a primary access to the development will be constructed.

We understand that the gross area of the Site is approximately 28.37 hectares (70.10 acres) with an NDA of 16.87 hectares (36.25 acres) or thereabouts, however this is likely to change as the scheme is refined following more detailed design and a fuller understanding of the sustainable drainage requirements.

The Site adjoins an existing residential estate to the east off Slade Lane and the Cashfield Estate further north. Further agricultural land lies to the north of the site, while to the south, Lovell/Pobl has commenced construction and sales for Phase 1 of their Augustus Grange development. A planning application for the approval of reserved matters for the second phase was submitted in August 2024.

An existing public bridleway intersects the site from Slade Lane to the east, connecting with Slade Farm to the west, and is to be retained and upgraded. According to Natural Resources Wales, the site is not located in a flood zone and is therefore not at risk of flooding; however there is a minor water course to the south western boundary. From our desktop due diligence search, we are not aware of any other major constraints affecting the site.

The Site is located within the defined Haverfordwest Settlement Boundary. The land is part of wider housing allocation ref: HSG/040/00274 in the adopted LDP and ref: S/HSG/040/LDP2/6 of the replacement LDP. It is proposed to accommodate up to 551 dwellings as part of a major urban extension to the northwest of Haverfordwest town centre.

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4. Location

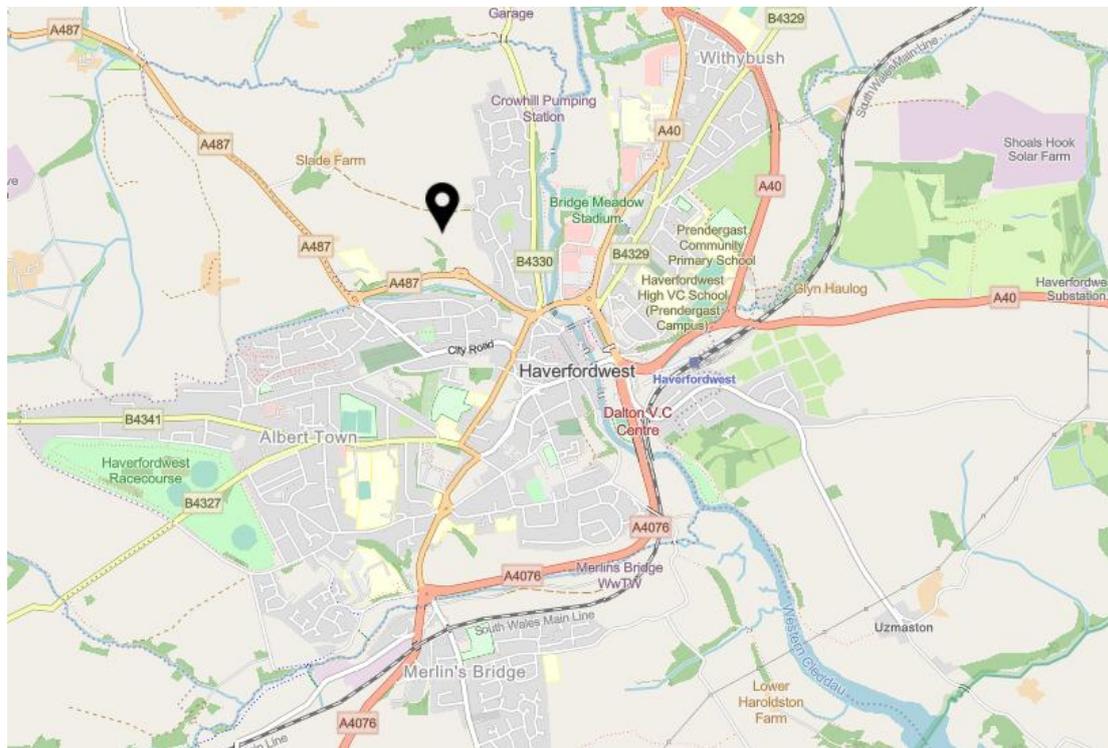
Haverfordwest serves as the principal commercial centre within the county of Pembrokeshire. It is c.0.4 miles from the A40 which connects with Fishguard to the north and Carmarthen to the east, with the M4 (Pont Abraham Terminus) located further onwards approximately 45 miles east of the site. The town has a railway station which offers a number of daily direct rail services to Swansea, Bridgend and Cardiff.

In Haverfordwest there is a variety of leisure and retail operators in the town centre. There is also Withybush Retail Park on the fringes of the town, which comprises Marks and Spencer, Boots, Next and Mountain Warehouse. Additionally, Withybush General Hospital, the main hospital for the region, is located c.1.1 miles to the north east of the town.

The Site itself is positioned in a sustainable location, approximately 0.4 miles west of the town centre and in close proximity to a variety of local services and amenities. It fronts onto Thomas Parry Way, where existing highway junction works have been installed in anticipation of this development progressing.

There are a number of schools in the vicinity, including Portfield School, Waldo Williams School, Fenton Community Primary School, Mary Immaculate Catholic Primary, Pembrokeshire College and the recently developed Haverfordwest High VC School which is approximately 0.8 miles east.

Further west is the Pembrokeshire Coast National Park (approximately 5.5 miles) which comprises 186 miles of scenic coastal areas and forms part of the Wales Coastal Path.



Location Plan

5. Development Proposals

The concept masterplan attached at **Appendix 1** and below identifies the site to have three primary access points, one from the junction at Thomas Parry Way and two from the Lovell and Pobl development (Phase 2) once completed, which forms part of the wider allocation for c.1,010 units. The existing green buffer north of Thomas Parry Way is to be retained and will include an attenuation feature adjacent to the proposed new junction.

The masterplan is divided into three blocks of development, with two smaller blocks to the south and a larger block to the north of the Slade Lane bridleway. There is significant Public Open Space (POS), and green infrastructure proposed with a mix of public open space areas, LAPs, LEAPs, NEAPs, and a MUGA across each block of development, alongside green corridors and attenuation features to allow suitable drainage of surface water.

Additionally, a 2.2 ha parcel of land has been designated for a new primary school, with a 0.5 ha parcel allocated for additional space to the western edge of the site, just south of the bridleway. The bridleway will be retained and upgraded to include a green corridor, identified as point A to B on the masterplan.

The site is constrained by a drainage easement that horizontally intersects the site through the centre of the northern parcel, where part of the active travel route is to be formed. We are not aware of any other site-specific constraints that would have a significant impact on development.



Concept Masterplan

Viability Assessment

Slade Fields, Slade Lane, Haverfordwest



The site has an NDA of approximately 36.25 acres (14.67 hectares) and a capacity to deliver a development of up to 551 dwellings at a density of 15 dwellings per net developable acre (37.5 dwellings per net developable hectare). A more detailed site layout and housing mix will be determined at the planning application stage, but it is anticipated that there will be a mix of 2, 3 and 4 bedroom homes, delivered as terraced, semi-detached and detached house types.

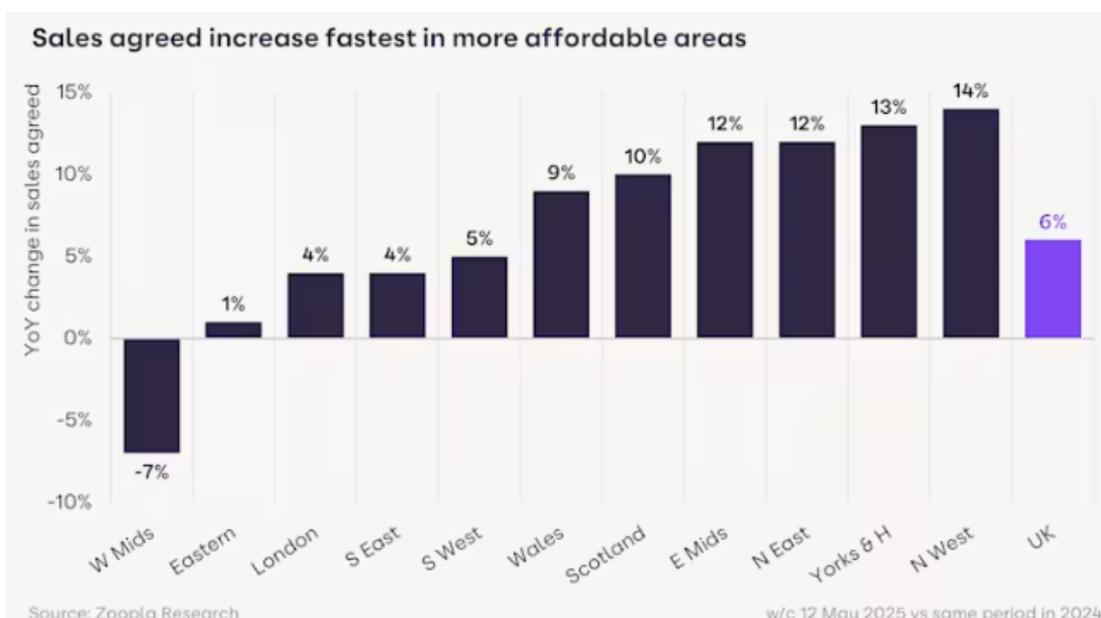
6. Market Commentary

6.1. National Housing Market Overview

UK house prices fell by -0.8% in June, according to Nationwide. This means that annual house price growth sat at 2.1%, a reduction from 3.5% in May. The softening in price growth may reflect weaker demand following the increase in stamp duty in England at the start of April, and in Wales annual growth is slightly higher at 2.6%.

Although some inflationary pressures remain, there is mounting worry over the UK's slow economy, which has encouraged the Monetary Policy Committee (MPC) to act to stimulate economic growth. This will allow lenders to cut mortgage rates, opening up more affordability in the housing market. The MPC is still signalling intentions to cut the base rate and Oxford Economics predicts two further cuts this year, but higher inflation could limit the pace lenders can cut their rates.

According to Zoopla, there were 6% more agreed sales in May 2025 compared to a year ago as confidence improves and those using a mortgage are able to borrow up to 20% more due to changes in affordability testing. However, there is a mixed picture across the country for both sales activity and price growth. Housing market activity and house price inflation are currently strongest in areas where homes are more affordable. Increased activity and price growth is being supported by improved affordability which comes as wage growth continues to outpace house prices.



In Wales, house prices and sales activity rose in 2024, buoyed by greater stability in mortgage markets improved buyer confidence and increased sales demand. However, according to Nationwide research house price so far this year is weaker than expected and in Wales growth decreased from Q1 to Q2 2025 by -0.2%.

New homes completions in Wales reached their lowest level in nearly a decade in 2024. Planning consents increased slightly, but remain low overall, meaning completions are unlikely to grow in the near term.

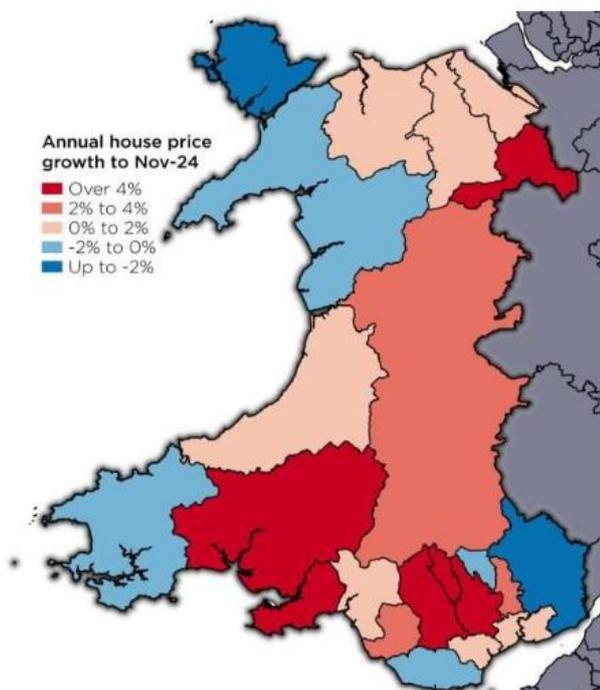
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Annual price growth is positive in most Local Authorities (LAs) in the year to November according to the lagged Land Registry price index. The index shows price falls in several coastal holiday hotspots. This may reflect a recentring of demand around urban locations as employers request in-person attendance more often. But there may also be weaker demand for second homes in areas like Pembrokeshire and Gwynedd, following increased in the additional Council Tax charged on second homes in these locations.

Figure 1 Average price growth, year to November 2024



Source: HM Land Registry (six-month smoothed)

6.1.1. Local Housing Market Overview

According to the Office for National Statistics (ONS) the average house price in Pembrokeshire was £217,000 in April 2025, up 2.6% from March 2024. This was lower than the rise in Wales of 3.6% over the same period. The average price paid by a first-time buyer was £185,000 in March 2025 which was 3.5% higher than the average of £179,000 in March 2024.

Rightmove states that the majority of properties sold in Haverfordwest during the last year were detached properties selling for an average price of £321,526. Semi-detached properties sold for an average of £185,498. Overall, the historical sold prices in Haverfordwest over the last year were down 5% on the previous year and up 4% on the 2022 peak.

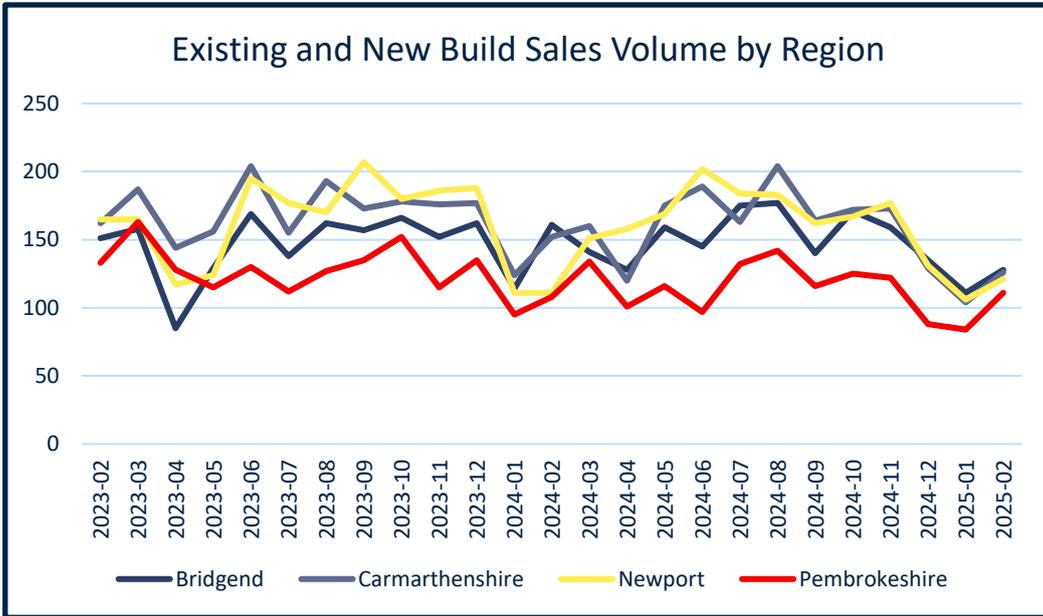
In Pembrokeshire, the housing market generally has a slower sales rate than other regions across south Wales. This trend is illustrated by the Land Registry table below, which displays the sales volume completed for both existing and

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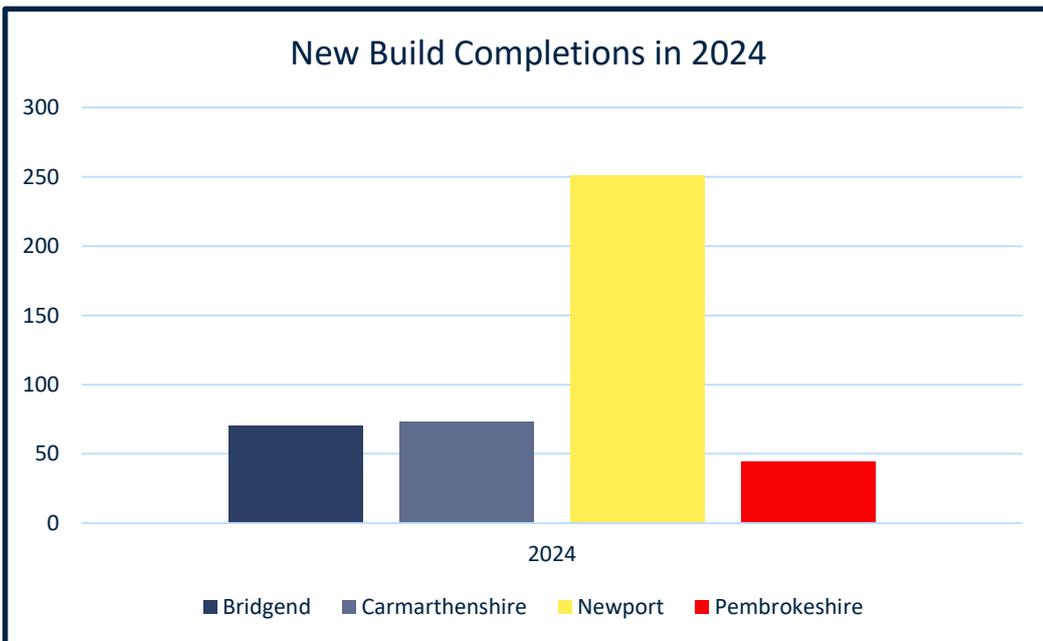
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new build properties over the past two years. When compared to counties such as Carmarthenshire, Bridgend, and Newport, Pembrokeshire consistently shows lower sales completions.



Furthermore, as illustrated in the table below only 44 new build sales were recorded in Pembrokeshire in 2024, compared to 73 in the neighbouring Carmarthenshire, 70 in Bridgend and 251 in Newport. This relatively low figure of completions last year underscores the sluggishness of the new build sales market in Pembrokeshire, highlighting potential challenges in attracting buyers to this region for housebuilders.



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6.2. Comparable Evidence

In arriving at our opinion of GDV, we have focused our comparable search on nearby new build developments, including the directly adjacent Augustus Grange development by Lovell in partnership with Pobl and further afield schemes in Carmarthen. Due to CMA, obtaining actual prices is proving more difficult than previously and we are having to rely on asking prices whilst making suitable adjustments in arriving at our opinions of GDV.

We have also considered secondhand sales of the most recent major housebuilder new build development in Haverfordwest, specifically the Persimmon Merlins Lane scheme from 2022, located off Scarrowscant Lane.

Augustus Grange (Phase 1), Haverfordwest – On the market asking prices¹

Lovell Homes

House Type	Type	Beds	Size (sq ft)	Price	£/ sq ft
Lambourne	Semi-detached	3	859	£249,995	£291
Lambourne	Detached	3	859	£265,000	£308
Lansdown	Detached	3	903	£275,000	£305
Milford	Detached	3	981	£299,995	£306

A number of incentives are being offered with these properties, including deposit contributions and flooring packages. We have been informed that prices have been reduced in recent months due to a slow sales rate.

Priory Fields, St Clears – On the market asking prices¹

Obsidian Homes

House Type	Type	Beds	Size (sq ft)	Price	£/ sq ft
Blyth	Semi-detached	2	817	£210,000	£257
Arlington	Semi-detached	3	904	£265,000	£293
Woodstock	Detached	3	1,244	£345,000	£277
Cleveland	Detached	4	1,458	£385,000	£264
Malvern	Detached	4	1,284	£430,000	£335
Grantham	Detached	4	1,403	£430,000	£321

Merlins Lane, Scarrowscant Lane – Secondhand sales

Persimmon (2022)

House Type	Type	Beds	Size (sq ft)	Price	£/ sq ft	Date
20 Tasker Way	Semi-detached	2	635	£175,500	£276	Aug-24
18 Tasker Way	Semi-detached	2	635	£165,000	£260	Jun-24
86 Tasker Way	Semi-detached	3	764	£212,500	£278	Dec-24
97 Tasker Way	Semi-detached	3	764	£185,000	£242	Jun-24
93 Tasker Way	Semi-detached	3	764	£209,995	£275	Mar-24
73 Tasker Way	Semi-detached	3	764	£211,995	£277	Feb-24
1 Tasker Way	Detached	3	969	£274,995	£284	Mar-24
5 Tasker Way	Detached	3	944	£275,000	£291	OTM
99 Tasker Way	Detached	4	1,098	£315,000	£287	Oct-24

¹ It should be noted that these prices are asking prices and not achieved sale prices at the respective developments.

7. Viability Assessment

We have set out the inputs applied in our appraisal below. We have conducted standalone appraisals for the 551 unit scheme at 30% (Option 1) and 25% (Option 2) affordable housing provision. Option 1 is unviable and shows a deficit; however, the Option 2 appraisal for the 25% provision is viable and deliverable. Consequently, we have detailed the assumptions from our Option 2 appraisal below.

7.1. GDV

7.1.1. Open market Units

The open market unit values have been arrived at using comparable evidence of other new and recent developments in the area. In analysing the evidence, we gave most weight to the houses at Lovell's Augustus Grange development which lies directly adjacent to the southern boundary of the site, whilst making suitable adjustments from "asking prices". We have also considered other new build developments in Carmarthen and secondhand sales of Persimmons Scarrowscant Lane scheme which was constructed in 2022.

DVM Ref	House Type	No. of Units	Size (sq ft)	Unit Value	£/ sq ft	GDV
O2a	2 bed semi-detached	135	700	£210,000	£300	£30,450,000
O3a	3 bed semi-detached	39	900	£265,000	£294	£10,865,000
O3b	3 bed detached	58	950	£275,000	£289	£16,775,000
O3c	3 bed detached	77	1050	£300,000	£286	£24,900,000
O4a	4 bed detached	19	1,100	£315,000	£286	£6,615,000
O4b	4 bed detached	29	1,200	£335,000	£279	£10,385,000
O4c	4 bed detached	29	1,250	£350,000	£280	£10,850,000
					£290	£110,840,000

7.1.2. Affordable Housing – Adopted Policy

We note that the Council's FVA concluded that the highest level of affordable housing that can be viably delivered in any part of Pembrokeshire is 25% whilst the Deposit Plan Policy GN20 sets out a requirement for 30% affordable housing for sites in Band 3 that will deliver 100 or more houses

As aforementioned, current policy requires 25% affordable for this housing allocation in the adopted LDP, however we have also tested 30% affordable policy provision in light of the deposit plan requirements. At this early stage we are unaware what the tenure mix would be so have adopted 65%/35% provision of Social Rent/ Low Cost Home Ownership (LCHO) tenures which is a common assumption based off our knowledge of other viability assessments.

The affordable housing floor areas and housing revenues are compliant with the Welsh Governments Acceptable Cost Guidance 2023 figures, which are the latest available, and Pembrokeshire County Council's Affordable Housing Supplementary Planning Guidance, which advises 55% of ACG (Band 3) for the social units and 70% of open market value for the LCHO units.

We provide a breakdown of the affordable housing units below:

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DVM Ref	House Type	Social Rent Units	LCHO Units	Size (sq ft)	ACG Value at 55%	OM Value at 70%	GDV
AF1	1 bed flat	34	-	570	£86,730	-	£2,948,820
AH2	2 bed house	17	31	893	£101,327	£150,500	£6,279,559
AH3	3 bed house	24	18	1,001	£114,672	£192,500	£6,217,128
AH4	4 bed house	14	-	1,227	£139,150	£234,500	£1,948,100
		89	49	121,464			£17,393,607

The total GDV for this scheme is therefore **£128,233,607 (£254psf blended)**.

7.2. Construction Costs

As a starting point, we use the BCIS lower quartile rate for our build costs which is £1,320 per sq m (£123psf). However, this is higher than what has been adopted in previous viability assessments and in discussions in viability working group workshops. We have therefore adopted a build rate of £1,188 per sq m (£110psf) which is approximately 10% below the BCIS prevailing lower quartile rate. This figure is in line with recent assessments and discussions of appropriate build cost inputs for sites of 100+ units in other authority areas such as the Vale of Glamorgan, Neath Port Talbot and Caerphilly.

In addition, we have allowed for the following, which are based on the most recent viability workshops and our experience of undertaking recent viability assessments for a wide range of developers and volume housebuilders across South Wales:

- LETI Standard - £9,000 per unit;
- Sprinklers & ULEV - £2,550 per unit;
- SuDS - £4,500 per unit;
- External Works – 17.50% of build costs (equivalent to £17,666 per unit);
- Contingency - 5% on the total build cost.

We have assumed that the detached open market House Types O3c, O4a and O4c (135 no. units) will have a detached garage and have applied an additional construction cost of £15,000 per garage.

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7.3. Infrastructure/Abnormal Costs

In addition to the construction costs and external works, our appraisal allows for a number of abnormal development and infrastructure costs from the high-level cost plan supplied by Cumming Group in January 2025.

Our assessment would suggest that some of the costs identified by Cumming Group would be included within our standard external cost allowance, for which we have allowed 17.50% of the total build costs in our appraisal (approximately £17,666 per unit).

Other abnormal costs may be identified, and these will need to be refined and costed as the site due diligence advances during the various stages of the development and planning process. For example, we are aware from a desktop site investigation that the majority of the site consists of made ground, which may require additional foundation costs beyond the general housebuilder foundation allowance we were provided by Cumming Group.

A summary of the abnormal cost breakdown is provided below:

Abnormal Item	Cost (£)
Slade Lane Bridleway Upgrade & Green Corridor Improvements	£1,682,383
Public Open Space (POS)	£648,950
Junction Improvements (Slade Lane)	£300,000
Sub-Station	£1,000,000
Active Travel Route	£1,267,200
Housebuilder foundation allowance	£250,000
Total	£5,148,533

The total abnormal costs for the site of £5,148,533 is equivalent to £9,344 per unit or £142,028 per NDA.

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7.4. Section 106

We have had regard to the Pembrokeshire FVA for LDP2 (July 2024) which tests the delivery of affordable housing targets and S106 obligations to ensure they are both realistic and achievable. The study notes that 100+ unit sites have delivered an average of £4,195 per unit since the current LDP's adoption.

In line with this information, we initially tested Option 1 with a Section 106 contribution of £4,000 per unit. This resulted in an unviable scheme, showing a significant deficit of **-£524,613**. This finding aligns with the FVA's statement that schemes of 100+ units would be unable to support a 30% affordable housing provision.

Following the findings of Option 1, we tested Option 2 with the same S106 contribution of £4,000 per unit which proved to be viable. Subsequently, we then tested Option 2 with an increased S106 contribution of £5,000 per unit, to be consistent with the 2019 recommendations from the Pembrokeshire FVA, which suggested a higher contribution of £5,200. This option produced a viable and deliverable scheme, resulting in a small surplus.

However, when tested at the FVA's most recent 2024 allowance recommendation of £6,000 per unit, Option 2 proved unviable, resulting in a deficit that demonstrates the impact of supporting increased contributions at this level.

The total Section 106 contributions for Option 2, based upon £5,000 per plot amounts to **£2,755,000**.

7.5. Fees

We have also allowed the following costs of the development:

- Site acquisition costs - 1.5% for agent and legal fees;
- Professional fees - 6% on house build costs and 10% on other costs;
- Site surveys - £300,000;
- Planning/ promotional costs - £300,000;
- Sales and marketing costs - 2.5% of open market sales;
- Legal Conveyancing Fees - £650 per affordable and open market unit;
- Finance - 6% pa debit interest.

7.6. Developer's Profit

We have adopted the DVM default profit margins of 20% on GDV of open market sales and 6% on cost of affordable housing cost, which are equivalent to a blended rate of 18.31%.

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7.7. Benchmark Land Value

Benchmarking as an approach is based upon the principle that “a viable development will support a residual land value at a level sufficiently above the site’s existing use value (EUV) or alternative use value (AUV) to support a land acquisition price acceptable to the landowner”.

It is generally accepted that, in assessing viability, unless a realistic return is allowed to a landowner to incentivise the release of land, development sites are not going to be released and growth will stifle.

In order to assess the premium over and above the EUV, we have considered the purchase price paid by Welsh Government for the land of £5,400,000 (£368,094 / net ha) as our BLV.

The summary table from the DVM is shown below:

Financial Viability Appraisal - Summary				
Gross Development Value		Units (N ²)		% GDV
Open Market Housing		413	£ 110,840,000	86.4%
Affordable Housing	25.0%	138	£ 17,393,607	13.6%
RESIDENTIAL GDV		551	£ 128,233,607	
Commercial/Investment NDV			£ -	0.0%
TOTAL SALES REVENUE			£ 128,233,607	
Other Revenue (Grant or Income)			£ -	
TOTAL DEVELOPMENT REVENUE			£ 128,233,607	100.0%
	NDA	£/ac		
Land (incl acquisition costs)	36.25	£148,966	£ 5,782,750	4.5%
Survey & Planning Costs			£ 600,000	0.5%
Community Infrastructure	£/unit	£5,000	£ 2,754,999	2.1%
Physical Infrastructure				
Normal On-Site Works	£/unit	£19,725	£ 10,868,550	8.5%
Abnormal Works/Costs	£/unit	£9,344	£ 5,148,533	4.0%
Professional Fees		10.00%	£ 1,601,708	1.2%
Housing Construction				
Build & External Costs	£/unit	£118,617	£ 65,357,714	51.0%
Professional Fees		6.00%	£ 3,921,463	3.1%
Commercial/Investment Construction				
Build & External Costs			£ -	0.0%
Professional Fees			£ -	0.0%
All Construction Contingency		5.00%	£ 4,344,898	3.4%
Sale, Letting & Marketing Costs			£ 3,129,150	2.4%
Finance Costs			£ 1,243,517	1.0%
TOTAL DEVELOPMENT COST			£ 104,753,282	
			Profit	£ 23,480,325
				18.3%
		Surplus/(Shortfall) in Profit	£260,077	1.12%
		against Benchmark/Target	£23,220,247	made up of:
		on open mkt housing sales	£22,168,000	target return 20.00%
		on affordable housing cost	£1,052,247	target return 6.00%
		on non-residential NDV	£0	target return 15.00%

NB: This appraisal is not a formal valuation and should not be relied upon as such

02/06/2025

8. Conclusion

We conducted a viability appraisal based on the deposit plan proposal, which seeks to deliver 30% affordable housing. However, this option was found to be unviable. In response, we conducted a second standalone appraisal based on a 25% affordable housing provision. This latter appraisal, in accordance with the Local Planning Authority requirements, demonstrated a positive surplus of **£260,077** based on the BLV when delivering S106 financial contributions equivalent to £5,000 per plot. This indicates that the development is both viable and deliverable, given the known site conditions and the assumptions used in the analysis.



Scott Caldwell MRICS
Director

Date: July 2025



Matt Allen MRICS
Surveyor

Date: July 2025

APPENDIX 1



- Site Boundary 
- Slade Lane (Green Lane/ Bridleway) 
- Primary School Site (2.2ha) 
- Additional PS School Site (0.5ha) 
- Attenuation Opportunity 
- Reinstated Linear Landscape Feature/ Active Travel Route 
- Potential Location for Local Centre (size/ uses to be determined) 
- Primary Vehicular Route (subject to engineering review) 
- Residential/ Play Space (dependant upon size of school site) 
- Easement to RW Main 
- Play Spaces**
- LAP 
- LEAP 
- NEAP 
- MUGA 

Note: Concept Masterplan - for illustrative purposes and comment only



Title	Concept Masterplan
Date	01.05.25
Scale	1:5000 @ A3
Drg. No.	IL67525/01-026

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APPENDIX 2

Financial Viability Appraisal - Summary

Gross Development Value		Units (N ²)		% GDV
Open Market Housing		386	£ 103,585,000	82.7%
Affordable Housing	29.9%	165	£ 21,650,482	17.3%
RESIDENTIAL GDV		551	£ 125,235,482	
Commercial/Investment NDV			£ -	0.0%
TOTAL SALES REVENUE			£ 125,235,482	
Other Revenue (Grant or Income)			£ -	
TOTAL DEVELOPMENT REVENUE			£ 125,235,482	100.0%
	NDA	£/ac		
Land (incl acquisition costs)	36.25	£148,966	£ 5,782,750	4.6%
Survey & Planning Costs			£ 600,000	0.5%
Community Infrastructure	£/unit	£4,000	£ 2,203,998	1.8%
Physical Infrastructure				
Normal On-Site Works	£/unit	£19,453	£ 10,718,550	8.6%
Abnormal Works/Costs	£/unit	£9,344	£ 5,148,533	4.1%
Professional Fees		10.00%	£ 1,586,708	1.3%
Housing Construction				
Build & External Costs	£/unit	£118,280	£ 65,172,478	52.0%
Professional Fees		6.00%	£ 3,910,349	3.1%
Commercial/Investment Construction				
Build & External Costs			£ -	0.0%
Professional Fees			£ -	0.0%
All Construction Contingency		5.00%	£ 4,326,831	3.5%
Sale, Letting & Marketing Costs			£ 2,947,775	2.4%
Finance Costs			£ 1,388,355	1.1%
TOTAL DEVELOPMENT COST			£ 103,786,328	
		Profit	£ 21,449,154	17.1%

	Surplus/(Shortfall) in Profit	(£524,613)	-2.39%
against Benchmark/Target	£21,973,768	made up of:	
on open mkt housing sales	£20,717,000	target return	20.00%
on affordable housing cost	£1,256,768	target return	6.00%
on non-residential NDV	£0	target return	15.00%

APPENDIX 3

Financial Viability Appraisal - Summary

Gross Development Value		Units (N ^o)		% GDV
Open Market Housing		413	£ 110,840,000	86.4%
Affordable Housing	25.0%	138	£ 17,393,607	13.6%
RESIDENTIAL GDV		551	£ 128,233,607	
Commercial/Investment NDV			£ -	0.0%
TOTAL SALES REVENUE			£ 128,233,607	
Other Revenue (Grant or Income)			£ -	
TOTAL DEVELOPMENT REVENUE			£ 128,233,607	100.0%
	NDA	£/ac		
Land (incl acquisition costs)	36.25	£148,966	£ 5,782,750	4.5%
Survey & Planning Costs			£ 600,000	0.5%
Community Infrastructure	£/unit	£5,000	£ 2,754,999	2.1%
Physical Infrastructure				
Normal On-Site Works	£/unit	£19,725	£ 10,868,550	8.5%
Abnormal Works/Costs	£/unit	£9,344	£ 5,148,533	4.0%
Professional Fees		10.00%	£ 1,601,708	1.2%
Housing Construction				
Build & External Costs	£/unit	£118,617	£ 65,357,714	51.0%
Professional Fees		6.00%	£ 3,921,463	3.1%
Commercial/Investment Construction				
Build & External Costs			£ -	0.0%
Professional Fees			£ -	0.0%
All Construction Contingency		5.00%	£ 4,344,898	3.4%
Sale, Letting & Marketing Costs			£ 3,129,150	2.4%
Finance Costs			£ 1,243,517	1.0%
TOTAL DEVELOPMENT COST			£ 104,753,282	
		Profit	£ 23,480,325	18.3%

	Surplus/(Shortfall) in Profit	£260,077	1.12%
	against Benchmark/Target	£23,220,247	made up of:
	on open mkt housing sales	£22,168,000	target return 20.00%
	on affordable housing cost	£1,052,247	target return 6.00%
	on non-residential NDV	£0	target return 15.00%

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