

Initial Questions – Examination
Pembrokeshire County Council Local Development Plan 2

March 2026

Task 1. Effects of planned Development on European Sites (Closed√)	1
Composite HRA & NRW engagement (Closed√)	1
The query regarding the CG Fry & Son Ltd case. (Closed√)	1
The query regarding any assumptions made in relation to windfall allowances (Closed√)	.3
Evidence of why mains drainage is not feasible in certain locations. (Closed√√)	4
SuDS and site capacities (Closed√)	6
Information regarding any planned STW improvements & headroom for development proposed (Closed√)	9
Advice to date that the Council has had from NRW (Closed√√)	10
SuDS and costs (Closed√)	11
Duration of mitigation effects (Closed√)	18
Task 2. Infrastructure and Task 4. Sites (Closed√)	23
Discrepancies between site capacities for key sites in Appendix F FVR & Policy GN 16√	23
Allocations rolled forward – evidence of substantial change in circumstances (Closed√)	23
Evidence of approach to phasing (Closed)√√	24
Development Sites SPG query (Closed√)	24
Reference to habitat retention on allocated sites in Policy SP12 - origin (Closed√)	26
What is a key site for viability assessment clarification? (Closed√)	27
Tasks 3.5.6.7.8 (all closed√ – see below)	28
Flooding (Closed√)	28
BMV (Closed√)	28
Previously Developed Land (Closed√)	28
Windfall provision (Closed√)	31
Housing Trajectory New Trajectory (Closed√)	32
Green Wedges Output: Updated Background Paper (Closed√)	32
Local Housing Market Assessment (Closed√)	32
Major Accidents (Closed√)	38
Wellbeing Plan (Closed√)	40
Task 9. Matters Arising Changes (Closed√)	42

Appendices

Appendix 1 Brownfield Candidate Sites Categories (non-allocation)	43
Appendix 2 Settlements and WwTWs	47
Appendix 3 Mitigation Options Summary Aecom DIN Developer Handbook	52

Appendix 4 Key Sites & Viability	54
Appendix 5 SuDS Options and Land Take suitability for High Density Development (30 to 50 dwellings)	55
Appendix 6 Phosphate Stripping Improvement WwTW	58
Appendix 7 Strategic Flood Consequence Assessment compliance with Technical Advice Note 15 (TAN15): Flooding and Coastal Erosion	60
Appendix 8 Allocations rolled forward – evidence of substantial change in circumstances..	63
Appendix 9 Wellbeing Plans - Key differences and similarities explained.....	90

Tables

Table 1 Opportunities for SuDS	6
Table 2 Examples of Measures for Mitigation	13
Table 3 - A comparison of the primary types of nutrient credit schemes for development (in England)	14
Table 4 Examples of Nutrient Credit costs in England	15
Table 5 All Candidate Sites Brownfield, Greenfield and Both	29
Table 6 Candidate Sites selected Brownfield Greenfield Both	29
Table 7 Candidate Sites not taken forward Brownfield, Greenfield, Both	30
Table 8 Non-Candidate Sites other than Housing - Brownfield, Greenfield, Both	31
Table 9 Non-Candidate Sites - Housing - Brownfield, Greenfield, Both	31
Table 10 Candidate Sites - Windfall - Brownfield, Greenfield, Both	31
Table 11 Settlements with their own WwTWs	47
Table 12 Settlements which are linked to a WwTW in a nearby settlement (with foul flows either pumped to the WwTW or alternatively reaching it by gravity flow)	48
Table 13 Settlements without a WwTW	50

Task 1. Effects of planned Development on European Sites (Closed√)

Output: see separate pdf documents
HRA Examination Version Closed√√
ED09a
Appendix B and C Screening Closed√
ED09b
Appendix D Policy Rewording Closed√
ED09c
Appendix E Nutrient Management Plans
ED09d Closed√

Composite HRA & NRW engagement (Closed√)

The query regarding the CG Fry & Son Ltd case.
(Closed√)

Output: Note to PEDW below

PEDW query: “As recognised in your Position Statement, a further complication is the recent Supreme Court judgment (CG Fry & Son Ltd vs SSHCLG [2025] UKSC 35) which confirms that HRA applies to the discharge of planning conditions. The Position Statement takes an initial view on potentially affected ‘commitments’ but accepts that further investigation may be necessary to establish the ongoing circumstances for each sites. •Clarify the potential effect of the CG Fry judgment on committed sites.”

Council Response: The sites listed under Policy GN 17 Residential Commitments within the catchment area were reviewed as part of a desktop exercise. Firstly, the type of permission that had been granted at each site was established (full or outline with part/all matters reserved). If applicable, it was then established if reserved matters approval had been granted. The second step was to ensure that any pre-commencement conditions had been successfully discharged. If permission had been granted, with all pre-commencement conditions discharged and the permission has been implemented, then the commitment could be screened out as there is no longer an opportunity to apply the Habitats Regulations process to the development.

Implementation of development on site was established using Google Earth, Streetview, annual housing survey data (which includes checking of building regulations records) and any Planning/Enforcement communication that was available to the officer.

Sites from Policy GN 17 within the catchment where there are outstanding pre-commencement conditions to be discharged or have expired permissions with no clear commencement on site, were screened in. For sites where there is a history of self builds, the undeveloped units on sites were screened in as the planning history suggests that an application is likely to be made to the Council for design amendments. There is a potential for the Habitats Regulations process to be applied to future applications.

In the case of CG Fry & Son Ltd vs SSHCLG [2025], the Supreme Court held that the Court of Appeal interpreted regulation 63 of the Habitats Regulation correctly. It found that for development that has a potential to impact a site protected by the Habitats Regulations, a decision that would result in an authorisation for a project to commence (i.e. reserved matters approval or approval through the discharge of conditions) would require an “appropriate assessment” to be undertaken and positively concluded prior to approval being issued. The desktop exercise that informs the Position Statement only screened out sites with permission, (including reserved matters approval where appropriate), where all relevant

conditions have been discharged. Therefore, the content of the Position Statement reflects the recent CG Fry & Son Ltd judgement.

Please note this is a desk top exercise at a strategic level for Plan preparation purposes and further detailed analysis of HRA requirements would be needed at the project (individual planning application) level.

The query regarding any assumptions made in relation to windfall allowances (Closed ✓)

Output: Note to PEDW

PEDW query: ...and identify any assumptions made in relation to windfall allowances.

Council Response: The windfall allowance used in the Position Statement for nitrogen is derived from the data used in Table A Housing Supply in Appendix 2: Housing Components and Trajectory of the Deposit Local Development Plan (updated March 2026). The trajectory components have been updated in response to the Inspectors' Initial Questions and as a consequence the windfall figures have also been updated.

In Table A there is a total number of estimated windfall dwellings for each settlement type (category of settlement in the hierarchy) for large (5+) (column E) and small (column f) windfall.

For urban settlements ('Main Towns') a figure is provided for each individual settlement in Table A Housing Land Supply. Only those settlements that are in the affected catchment area are included within the calculations.

For the groups of settlements 'Service Centres' to 'Local Villages' the figures for small and large windfall for each category of settlement were used to find an average windfall per rural settlement in that category. For example for Service Centres the small windfall allowance is 36 (estimated windfall figure in column F) for all Service Centres - Table A, Appendix 2- LDP 2 Text showing draft MAC changes) if divided by 9 (there are 9 Service Centres listed in the Plan) = on average 4 windfall dwellings per Service Centre. This average was used alongside the GIS data to select those Service Centres in the affected area to estimate the total affected windfall (e.g. if there was 1 Service Centre within a phosphate Cleddau catchment then an estimated 4 small site dwellings in Service Centre's category will be in the affected area in the affected area. This is the method used to calculate the windfall allowance affected all settlement types in the hierarchy.

For windfall in the 'Countryside' the proportion (the geographical area) of affected Pembrokeshire County Council Local Planning Authority Area (LPA) land was calculated with GIS software and used to calculate the equivalent estimated portion of windfall dwellings likely to be affected (e.g. 39% of the LPA land is in Cleddau Phosphate catchment. 61 dwellings (small windfall – column F) are expected in the countryside based on past trends. $61 \times 0.39 = 23.79$ dwellings are likely to be affected).

PEDW Query: Where non-mains drainage is proposed, justify why mains drainage is not feasible.

Council Response: This is because historically mains drainage isn't provided in all settlements /locations. The tables in **Error! Not a valid result for table.** to this Paper sets out the position for the named settlements in Local Development Plan 2 (Policy SP 6 Settlement Hierarchy) identifying in:

- Table 11 Settlements with their own WwTWs
- Table 12 Settlements which are linked to a WwTW in a nearby settlement (with foul flows either pumped to the WwTW or alternatively reaching it by gravity flow)
- Table 13 Settlements without a WwTW

Regarding the last table above where those settlements / locations without mains drainage are listed it can be noted that most of these are '2. Rural Settlements' in the '2c.Local Village' category, where the Council is not allocating land for future residential (or other) development and where future residential growth will be restricted to infill within the Local Village Settlement Boundary – mostly small-scale infill development opportunities and noting that some of the listed Local Villages are 'cluster' settlements, where the Settlement Boundary may allow for slightly more infill than in non-cluster settlements – but the scale of future growth will still be very limited.

There are three locations in the last table that are '2.b. Service Villages' – Jeffreyston, New Hedges and Robeston Wathen.

In Jeffreyston and Robeston Wathen, residential allocations have been proposed by LDP 2, despite the absence of mains drainage / a WwTW. Each of these settlements has scored sufficiently high in assessing provision of services and facilities that a Service Village categorisation is justified, this being despite the absence of mains drainage / WwTW. The Council is of the view that the absence of one of the assessed services should not necessarily preclude a residential allocation if an appropriate site can be found – and in each case such a site has been found. In each instance, the development will need to incorporate a private treatment plant (PTP) for disposal of foul water. Such a plant will need to meet the regulatory requirements for such facilities.

In New Hedges, which is a split settlement with part of the village in the National Park and part outside the National Park, no opportunity to make a residential allocation has been found in the Council's area of planning jurisdiction. Hence, in this settlement also, future residential growth will be restricted to infill opportunities within the defined Settlement Boundary. There are no other allocations in this settlement. The comment relates to the Council's planning area but to note that its provisions are in conformity with those in the part of the settlement in the National Park. Also to note – the above commentary does not apply to Park House Court, which is midway between New Hedges and Tenby. It is understood that this site drains to Tenby WwTW.

A note on major industrial sites: These generally incorporate their own systems for waste disposal, including foul and surface water elements. However, some of the allocated sites await development and thus such systems will need to form a part of the overall development proposal at application stage. Some elements of waste disposal (in the round) at the major sites will be subject to Natural Resources Wales (NRW) permitting requirements.

A note on local industrial sites: In most cases, these sites will drain to the WwTW to which their nearest settlement drains, but there are a few exceptions, for instance the Celtic Link Business Park near Sceddau, Land at Princes Gate Spring Water and the site South of KP Thomas and Sons, near Templeton.

A note on sites for waste management facilities: The sites identified as being potentially suitable for such facilities are at existing and proposed industrial sites, so the comments above will apply.

A note on Cawdor Barracks, including the former Brawdy Airfield: This is currently in use by the Ministry of Defence and there is some existing residential development 'within the wire'. There are existing systems in place relating to foul and surface water disposal. These may need to be modified in conjunction with any future development proposals.

A note on Gypsy and Traveller accommodation sites: The proposed new / extended sites can generally drain to sewerage systems in their related settlement and to the WwTW to which those settlements drain. An exception is the site described as 'Land east of Withybush Gypsy and Traveller site, which is too distant from Haverfordwest to be capable of draining to Merlins Bridge WwTW. The current site has a Private Treatment Plant (PTP), which requires replacement, hence a new PTP will be required, which will have capacity to serve the existing site and the allocated site.

A note on remote rural locations: Generally, these are not locations that are identified by LDP 2 as being suitable for future growth. However, there are some criteria-based policies in LDP 2 that could potentially allow certain types of development to come forward in such locations. An example would be visitor accommodation. In these cases, it is unlikely that a connection to a mains sewerage system or water company WwTW will be possible, so a private system will be needed instead. The Council does not envisage that such instances will occur on a regular basis and will always look for a mains drainage connection where feasible.

PEDW Query: Clarify how dwelling numbers and densities for each allocated site have been arrived at (noting that para 2.18 of the SuDS Statutory Guidance states that “it is important that strategic planning provides for SuDS, ensuring space within development so that surface features which are more likely to provide multiple benefits can be accommodated and SuDS do not have to be “squeezed in” and compromises made”).

Council Response: As set out in the Local Development Plan 2 (LDP 2) (para 5.88), it’s important that new residential development uses land efficiently and essential that proposals incorporate appropriate mitigation for Sustainable Drainage Systems (SuDS) while addressing requirements to maintain and enhance biodiversity. As a result of these requirements a minimum density of 23 dwellings per hectare in Service Centres and Service Villages is identified and 30 dwellings per hectare in Towns, to ensure the efficient use of land across the Plan area. For clarity, these are based on gross site area: net densities will accordingly be higher. (GN 13 Residential Development). This approach was also applied to allocations proposed in the Local Development Plan.

In deriving dwelling numbers and densities at this strategic level for LDP 2, reference can be made to the guidance manual for the use of SuDS in High Density Developments produced by HR Wallingford.¹ The guide is intended to assist developers, their professional advisors and local planning authorities with achieving drainage best practice on all new developments, with specific direction on achieving sustainable drainage solutions for high density sites. Chapter five of the guidance looks at methods of applying SuDS in high-density developments and the locations in which SuDS can be used.

Specifically, for LDP 2, it’s noted that housing densities of between 30 to 50 dwellings per hectare (net) have implications that affect the use of SuDS², including:

- A high proportion of impervious surface area within a site
- Reduced land availability for surface drainage structures
- Smaller gardens with reduced opportunity to use soakaway techniques
- An emphasis on planned communal public open space

The layout of housing – terraced, road frontage or courtyard – dictates, to a large extent, the types of SuDS components that can be used. Typically, new residential development sites are made up of impermeable surfaces (60%) and green space (40%). Green space is typically split 50/50 between gardens and public open space.

The table below ³shows the opportunities for SuDS use:

Table 1 Opportunities for SuDS

Gardens	Roofs	Car parking	Home zone roads Mews car parking	Local roads	Distribution roads	Public open space
Soakaway	Water butts	Pervious pavements		Standard swales		Ponds
Infiltration trenches	Green roofs			Storage swales		Basins

¹ Weblink: <https://eprints.hrwallingford.com/550/1/SR666-Use-SUDS-High-Density-Developments.pdf>

² 5.1 DEVELOPMENT LAND USE page 47 *Use of SUDS in high density developments - guidance manual*

³ Derived from Figure 5.1 from *Use of SUDS in high density developments - guidance manual*

Mini swales	Gutter storage			Filter trench	Wetlands
				Linear ponds	

A mix of SuDS components placed in series and distributed through the development is usually the most cost effective and efficient system, both in terms of water quality and hydraulics.

The approximate area required for SuDS can range, but a common rule of thumb for open features is an allocation of 12-15% of the total site area or a ratio where the impermeable area is up to 5 times the vegetated SuDS area⁴. In high-density developments, this is achieved by integrating SuDS components throughout the site rather than relying on a single large feature. In high-density developments, achieving the required SuDS capacity often involves a "management train" approach, integrating various smaller, source-control components (e.g., green roofs, rain gardens, tree pits, permeable pavements) across the site rather than a single large pond at the end of the system.

For LDP2, anything over 30 dwellings per hectare would be regarded as high density. Future Wales – the National Plan 2040, sets out a number of strategic placemaking principles. One of these is to increase the population density of towns and cities. In urban areas, a density of at least 50 dwellings per hectare, based on the net site area, is suggested.

For Pembrokeshire, a largely rural County, LDP2, Deposit Plan 2, sets out minimum site densities for gross site areas, which are generally lower because they make allowance for sustainable drainage systems alongside matters such as highways, amenity open space, recreational open space, garden spaces, landscaping, planting and boundary treatments and other green infrastructure including, where necessary, green buffer zones.

For the towns, a gross figure of 30 dwellings per hectare minimum is generally used, reducing to 23 dwellings per hectare for Service Centres and Service Villages. Minimum densities based on net developable area would be significantly higher. There are a few occasions where a lower density is justified by site-specific factors.

The table in Appendix 5 SuDS Options and Land Take suitability for High Density Development (30 to 50 dwellings) sets out the various SuDS options and their relative land take and suitability for high density development (30-50 dwellings per hectare).

While there is no fixed rule when it comes to defining the exact area required for high density SuDS, there are some key considerations. The exact area is not a single, universally fixed percentage, but depends heavily on the specific design and site conditions (such as ground infiltration rate and soil type). In addition, the final design must be supported by detailed hydraulic calculations and ground condition assessments (e.g., infiltration tests) to prove compliance with local and national standards. The SuDS Manual (CIRIA C753)⁵ is a key guidance document used by professionals in the UK.

A material consideration is the role of SuDS in mitigating nitrates run off. Where the SuDS management trains described in Option 1 and 2 (Sections 7.1 and 7.2) are designed in accordance with CIRIA C753 and where full treatment is provided for all sub annual rainfall

⁴ National standards for sustainable drainage systems (SuDS), <https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems/national-standards-for-sustainable-drainage-systems-suds>

⁵ https://www.ciria.org/CIRIA/Books/Free_publications/C753F.aspx

events, these schemes can be considered to capture and remove 30% of the nitrogen in the runoff from the development as an average over the year.

The options are repeated here for completeness:

Option 1: Ponds Followed by Bioremediation Devices: Good nitrogen removal can be delivered by first including a device with a permanent pool of water, followed by devices that provide aerobic biological activity such as a bioremediation or bioswale/wetland channel. If it is easier this can be multiple small ponds across the development. The inclusion of a sediment removal device to protect the permanent pool from excess sedimentation is essential for each pond; this can be delivered using a sediment forebay or a manufactured sediment separator.

Option 2: Lined infiltration devices, followed by a pond: If designers want to stick with a more common treatment train approach, but they want to maximise nitrogen capture and removal, they can include permeable surfaces, bioretention zones, tree pits and wetland channels/bioswales with lining underneath them, and then direct the subsurface discharge and overflows to a pond at the bottom of the system.

SuDS also play a significant role in mitigating phosphates runoff. CIRIA has published recommendations of the use of SuDS for phosphorous removal from surface water runoff on new developments⁶ which can be referred to. The document provides good practice guidance on the use of SuDS for reduction of phosphorous and how the use of 'treatment trains' can achieve phosphorous removal, particularly for sensitive receiving waters and nationally important nature conservation sites.

Modelling shows how using three stage SuDS management trains produces the best results, with the CIRIA guidance concluding the more stages of treatment available the greater the opportunity for treatment⁷. Train 1 (Pervious paving discharging into swale discharging into pond) gives a mean removal of 51%. Ergo, ponds are seen as the best method for dealing with phosphorous pollution.

The final column in Appendix 5 SuDS Options and Land Take suitability for High Density Development (30 to 50 dwellings) indicates which SuDS options are most likely to be relied upon to achieve the highest nitrogen and phosphate mitigation on site.

Conclusions and recommendations: Proper SuDS implementation will ensure new developments will deal with flood risk from both outside and inside the development while the SuDS treatment train concept will deliver water quality benefits. Proper SuDS design will also deliver natural amenity and biodiversity benefits. LDP2 requires that SuDS are considered from the earliest stages of master planning, integrated with landscape and ecology strategies, and supported by robust maintenance arrangements. If LDP2 dwelling densities do not exceed 30 dwellings per hectare this should ensure that the preferred SuDS options can be incorporated into new developments. Using these proposed densities should ensure that drainage is not left as an afterthought or treated purely as a technical compliance exercise but rather an integral part of the overall design.

⁶ [Use of SuDS to reduce phosphorus in surface water runoff](#)

⁷ Section 3.3 and 3.4 (Pages 24-26), [Use of SuDS to reduce phosphorus in surface water runoff](#)

Information regarding any planned STW improvements & headroom for development proposed (Closed ✓)

Output: Note to PEDW

PEDW Query: Information on planned improvements for nutrient stripping (including the percentage efficiency of such stripping) at any relevant WwTW.

The name of the relevant WwTW, permit limits, and how any identified 'headroom' for new connections relates to the strategic objective of nutrient neutrality

Council Response: See Appendix 6 Phosphate Stripping Improvement WwTW for a list of improvements of STW in the freshwater SAC in relation to phosphate stripping. All STW with associated residential allocation and commitments have undergone permit review and currently have permit limits for phosphorus concentrations. A number of these STW will undergo work in the next five years to meet tighter permit concentrations. DCWW have indicated that there is headroom in STW where allocations and commitments have been planned. The recent permit reviews which set phosphorus concentrations in STW permits is part of the fair share approach taken by NRW and Welsh Government which will aid SAC river restoration alongside other actions which will be highlighted in the HRA. More information is provided in the HRA. To note since the Local Development Plan 2 was placed on Deposit the Dwr Cymru Compliance scheme which was due for completion 31st Dec 2025 has had an updated date for 2030.

PEDW Query: *We are also concerned that the position of NRW on your HRA is currently unknown, in terms of whether 'Focussed Changes' amendments address previous concerns raised regarding effects of atmospheric pollution on European sites, and in relation to the suggested approach to nitrogen loads in the Position Statement.*

Council Response: A summary of Natural Resources Wales' response on the Deposit Local Development Plan 2 can be found in SD09.5 Appendix 4 - Issues Papers updated 23 September 2025 section 4.7 Habitats Regulation Assessment starting page 42 of the report.

The edits to the Habitats Regulations Assessment as published as part of the Focussed Changes consultation were primarily because of those comments received from Natural Resources Wales (NRW). The Council's consultant met with NRW to discuss the edits proposed.

NRW emailed the Council its response to the Focussed Changes consultation to advise – see section 6..37 'Habitats Regulations Assessment' of SD09.7 that '*NRW have no comments to make in respect of the current consultation and will await the submission of a draft Position Statement in response to NRW's updated conservation Regulation 37 advice and conditions assessment for marine protected areas. A meeting is set for the 24th of September 2025.*'

A meeting was held with NRW on the 24th of September 2025. Council Officers had provided NRW with a copy of its draft Position Statement which set out its response to NRW's advice regarding the Pembrokeshire Marine SAC published in June 2025. NRW were supportive of the approach in principle and advised that any further detailed comments would be provided by the 1st of October 2025. Comments shared in that meeting were taken on board and edits done after the meeting related to the need to edit in relation to Article 6(2) and Article 6(3) and the need to add text reflecting a more positive framework around farming and land use change and how best to reflect the need for a farm scale nutrient management mitigation plan type approach.

NRW then emailed on the 9th of October 2025 to advise: *Thank you for the opportunity to consider the Draft Position Statement. We welcome the overall approach taken by your Authority, which is a logical review of policies and importantly the assessment that has been completed to quantify the potential nutrient impacts of planned development within the LDP and the prediction of scale of mitigation required to deliver that development within the framework of neutrality. The metrics determined for the statement are an important start point from which the nutrient impacts of development can be addressed within the strategic planning process. We discussed a number of issues in our recent meeting and we note that you will be undertaking further work to develop commentary on the place of Article 6(2) and Article 6(3) measures within the Nutrient Neutrality and wider marine SAC catchments plus a narrative on sustainable land management approaches/farmscale nutrient management planning.*

The Position Statement which included these suggested edits was submitted to PEDW as part of the final part of Submission (Ref: SD12.1 & SD12.2) on the 10th October 2025.

The County Council is liaising with NRW as required by PEDW in its initial letter in relation to the Composite HRA. As at 24th March 2026 NRW Officers have advised that formal sign off from the relevant person/s in NRW is awaited.

PEDW Query: *The Position Statement states at para 6.24 that “[financial] allowances and surplus profit can assist with the provision of nutrient neutrality for sites”. If the LDP is to rely on SPG to facilitate the delivery of allocated sites, clarify whether the assumed £1,500 per dwelling for SuDS provides sufficient headroom for any potential required mitigation for all nutrients. (Broad-brush assumptions are acceptable, and the Council may draw on evidence from other Local Planning Authorities).*

Council Response: Mitigation can be delivered either on-site or off-site. On-site options include sustainable drainage systems (SuDS) or landscaping that absorbs or intercepts nutrients. Off-site solutions are often more feasible, particularly for smaller schemes, and include the purchase of nutrient credits through mitigation schemes.

On site Sustainable Drainage Systems (SuDS): All new developments of more than 1 dwelling house or where the construction area is 100 square meters or more, require sustainable drainage systems (SuDS) for surface water, in accordance with the Welsh Government Sustainable Drainage (SuDS) Statutory Guidance (since January 2019). The SuDS must be designed and built in accordance with Statutory SuDS Standards⁸ published by the Welsh Ministers and SuDS Schemes must be approved by the local authority acting in its SuDS Approving Body (SAB) role, before construction work begins. In 2017, the Welsh Government commissioned a report to assess the performance of SuDS on new developments, including costs and benefits, compared with conventional drainage approaches. The purpose of this assessment was to inform potential policy changes that could be made to accelerate the use of SuDS on new developments in Wales. The key findings from the report showed that different SuDS schemes in different places have very different costs and benefits. However, based on the evidence obtained, **the capital costs of SuDS solutions are lower than the capital costs of comparable conventional solutions**⁹. This differential can be very significant and depends primarily on the size of the scheme and the SuDS components used.

Paragraph 2.6 of the study summarises how studies on the cost of SuDS are tempered by several factors, which are repeated below:

- Information relating to quantified and monetised costs and benefits not regularly being available or forthcoming in many cases. For costs, this is generally because either the information is bound up with broader landscape and development design and cost information, or because it is held by sub-contractors, commercially confidential or subject to stakeholder sensitivities. For benefits, it is generally because these have not been formally considered or assessed.
- Whilst there is a wealth of information related to the cost of individual SuDS schemes (e.g. Transport for London, 2016; West Country Rivers, undated), in the majority of cases there is no direct or simple comparison with conventional approaches. This lack of a comparator makes the information redundant from the perspective of making an economic case for SuDS, and meant that this information could not be used directly to inform the project.
- The data and information we have been able to collate for this project is generally on a ‘total scheme’ basis. As such, the analysis undertaken is not based on the costs and benefits of individual SuDS components. Information on the costs of such components, and the factors that impact these costs (e.g. ground conditions) is available elsewhere (e.g. CIRIA, 2015; Environment Agency, 2015; Royal Haskoning 2012b).
- In some cases, cost information has been extrapolated or estimated after construction, whilst in others information on costs and benefits is largely theoretical (i.e. the scheme has not been built). Whilst neither case invalidates the information collated, it does mean that biases could be introduced and that the findings are subject to a degree of uncertainty.

⁸ Statutory SuDS Standards for designing, constructing, operating and maintaining surface water drainage systems, available at: <https://gov.wales/topics/environmentcountryside/epq/flooding/drainage/?lang=en>

⁹ https://www.susdrain.org/files/resources/evidence/analysis_of_evidence_including_costs_and_benefits_of_suds_wg_2017.pdf

- Information on costs other than capital (capex) and operational (opex) costs (e.g. administration, design or planning costs) is, at least currently, rarely available separately. These costs may be significant (particularly to the consenting or adopting organisation), and provision to meet these costs would need to be considered if legislative or other changes are made. However, many of these costs are capitalised and, given the lack of clear evidence currently, we assume that the majority of these costs are subsumed within broader capital and operational cost categories.
- Costs and benefits will vary for a number of reasons, largely related to the specific design, characteristics, location and quality of the scheme. As such, the estimates provided here should not be used to guide the assessment of any specific scheme. They are designed to be used at a macro level to inform policy decisions.

The *SuDS on new developments: Analysis of Evidence*¹⁰ study highlighted the following key points:

- Based on the evidence considered here, the capital costs of landscaped SuDS solutions are lower than the capital cost of comparable conventional solutions at every level. On average, our analysis suggests that **the use of SuDS could save Wales over £9,000 per new home in capital costs alone.**
- Of those schemes examined in detail, operational costs of landscaped SuDS solutions are also lower than the operational cost of comparable conventional solutions at every level.
- In terms of costs per household, there are, as would be expected, capital cost economies of scale for both conventional and SuDS schemes, with capital costs per household falling significantly as the scale of development increases.

It concludes: “Taken together, the evidence considered and presented here indicates that there is a very strong economic case for SuDS on new developments. The costs of SuDS solutions are less than the costs of conventional solutions in almost every case, often by a significant margin.” [Section 4.3, page 43]

Engineered SuDS vs Landscaped SuDS: Engineered SuDS schemes include solutions like permeable paving and geocellular attenuation tanks, known for being easy to install and cost-effective. Typically, they efficiently manage water runoff quantity and can support a holistic approach to water quality management.

Landscaped SuDS, incorporating green roofs, rain gardens, tree pits, swales (shallow drainage channels), and constructed wetlands, extend beyond managing water quantity. They contribute to water quality improvement, enhance amenity spaces, and create habitats for biodiversity. However, the challenge lies in their limited ability to handle significant rainfall levels.

The table below sets out the indicative costs for various SuDS options:

Urban SuDS	Indicative costs ¹¹
Swale	£10-15 per m ² swale area
Filter Drain	£120 per m ²
Soakaways	<£100 per m ² stored volume

Off-site solutions: Developers can work with the Local Planning Authority to arrange for mitigation off-site. For example, developers can create new wetland activity, areas of rewilding or creating buffer zones along rivers. Off-site mitigation must be located upstream of the development area in the same catchment area.

Off-site mitigation is generally required for brownfield sites as on-site mitigation is often not feasible for these developments. It is expected that mitigation measures will remain in place in perpetuity. They may be held in place through the use of Section 106 planning obligations.

¹⁰ https://www.susdrain.org/files/resources/evidence/analysis_of_evidence_including_costs_and_benefits_of_suds_wg_2017_.pdf

¹¹ Environment Agency (in 2015)

Nature based solutions: Two previous studies summarise possible nature-based solutions and are presented below with approximate capital costs.

In October 2023, Royal Haskoning produced *Norfolk Nutrient Guidance- Nutrient Mitigation Solutions* for Norfolk¹². This report set out suitable short, medium, and long-term mitigation options that could potentially be used to offset the additional nutrient load from a new development within the catchment of the River Wensum Special Areas of Conservation and/ or The Broads Special Areas of Conservation, including potential strategic options to manage nutrient inputs and allow further residential development to proceed.

More recently, Aecom Infrastructure & Environment UK Limited were commissioned by Carmarthenshire County Council to produce a *Developer Mitigation Handbook*. It's intended that this will be published as Supplementary Planning Guidance (SPG) and provide information and advice to support applicants to adequately consider DIN neutrality in planning submissions within the Milford Haven Inner (Pembrokeshire Marine SAC) and Burry Inlet Inner (Carmarthen Bay and Estuaries SAC) water body catchments.¹³

Table 2 Examples of Measures for Mitigation

	Measure	TP removal potential	TN removal potential	Capital costs
Royal Haskoning	Silt traps	25-75%	<25%	£1,000-£4,000
	Riparian buffer strips	67%	65%	~£786/ha
	Constructed wetlands	46%	37%	£250,000-£750,000
	Wet woodlands	Uncertain		£10,000/ha
	Willow buffers	70%		£2,500/ha
	Beetle banks	Unknown		
	Broadland restoration	50%	Unknown	£60,000/ha
Beaver reintroduction	20-80%		No reliable estimate for beaver reintroduction. Engineered logjams in the range of £5,000- 25,000, not including land purchase if required	
AECOM Infrastructure & Environment UK Limited	Landuse change			High-cost solution for smaller developers
	Agricultural management measures			~£1,274.39/ha/yr
	Treatment wetlands			£44-72/m ³ treated volume (2015 costs)
	Other wetlands			Lower than treatment wetlands
	Field boundary management			Low

¹² <https://www.southnorfolkandbroadland.gov.uk/asset-library/imported-assets/royal-haskoning-norfolk-nutrient-strategy-nutrient-mitigation-solutions-report-oct-2023.pdf>

¹³ Marine and Estuarine DIN Mitigation Strategy – Developer Mitigation Handbook – Draft

Enhanced drainage ditch management		Lower capital costs than more land-intensive approaches
Removal of surface water/wastewater from affected catchment		Mid to High

Nutrient credit trading schemes: Whilst there are no known nutrient credit trading schemes in Wales currently, there are well-established schemes in England. This follows on from Natural England identifying more than 70 catchments in England where development may need to demonstrate nutrient neutrality. This includes parts of the Solent, the Somerset Levels, the River Wye, and the Norfolk Broads, among others. The specific requirements vary from one catchment to another, depending on the baseline condition of the waterbody, local land use, and wastewater infrastructure.

In 2023, the UK Government launched the Nutrient Mitigation Scheme¹⁴, overseen by Natural England, to broker and supply nutrient credits to developers. These credits are generated by third-party landowners who implement nutrient-reducing projects, such as woodland planting or wetland restoration. Legal agreements, such as Section 106 obligations or conservation covenants, are used to secure these arrangements for the lifetime of the development's impact. Some mitigation project schemes are led by local authorities or Natural England and developers can pay to offset their nutrient loads. In general, schemes supply credits which are considered the mitigation equivalent of one kilogram of nitrogen or phosphorus emitted per year.

Table 3 - A comparison of the primary types of nutrient credit schemes for development (in England)

	Natural England's (NE) Nutrient Mitigation Scheme	Private Mitigation Schemes	Local Planning Authority (LPA)-Led Schemes
Overview	A government-backed, strategic scheme that sells nutrient credits directly to developers, currently active in areas like the Tees and Poole Harbour catchments	Developers, landowners, or third-party investors create their own mitigation projects (e.g., wetlands, woodland creation, or taking land out of agricultural use)	Similar to the NE scheme, but managed by local councils to facilitate development in their specific regions
Pros	Provides a reliable, government-backed, and direct route to securing credits. It allows for "ahead of time" mitigation, meaning the credits are often "oven-ready"	Can be more cost-effective for larger, long-term developments and provides flexibility in project design	Aligned with local development plans and often provide a more tailored, local approach.
Cons	Limited availability in certain areas; a "seller's market ¹⁵ " has led to high costs, with some, like the Solent,	Requires navigating complex, long-term monitoring (usually 80 to 125 years)	Not available in all areas; may have limited capacity, creating a bottleneck

¹⁴ <https://www.gov.uk/government/publications/natural-englands-nutrient-mitigation-scheme-for-developers>

¹⁵ <https://www.fwi.co.uk/business/payments-schemes/environmental-schemes/nutrient-mitigation-is-there-a-viable-market-for-farmers>

	charging between £2,500 and £5,000 per nitrogen credit.		for smaller developments
Suitability	Best for projects needing guaranteed, fast-tracked, and officially verified mitigation	Ideal for developers with large, long-term developments or those with access to land in the same catchment.	Good for smaller developers or those in areas where the council has proactively set up a mitigation scheme

The choice of scheme depends on the size and location of the development, the budget, and the need for speed. While the Natural England scheme provides reliability and speed, private and local schemes can offer more flexible, cost-effective, or tailored solutions.

How much do credits cost?: Evidence drawn from other Local Planning Authorities/projects is summarised below. For the purposes of this summary, the admin and legal fees associated with each scheme is not counted.

Table 4 Examples of Nutrient Credit costs in England

Local Planning Authority	Name of scheme/project	Nitrate Credit cost (per kg)	Phosphate Credit cost (per kg)
Somerset Council			£34,061 ¹⁶
South Hampshire	Solent Mitigation Partnership ¹⁷	£3,250	£50,000
Havant Borough Council		£3,535 ¹⁸	
Eastleigh Borough Council		£3,000 ¹⁹	
Portsmouth City Council		£2,500 ²⁰	
Winchester City Council ²¹	Partnership For South Hampshire	£3,250	£50-100,000
Hampshire	Isle of Wight Wildlife Trust	£2,500 ²²	
Ashford Borough Council	Stour Environmental Credits Ltd. (SEC) ²³	£2,350	£35,000
Natural England	Poole Harbour catchment	£3,250 ²⁴	
Natural England	Tees catchment	£2,700 ²⁵	
Norfolk	Norfolk Environmental Credits ²⁶	£6,050*	

¹⁶ <https://www.somerset.gov.uk/planning-buildings-and-land/somerset-council-phosphate-credit-scheme/>

¹⁷ <https://solentmitigationpartnership.co.uk/how-it-works/>

¹⁸ Havant Borough Council Position Statement and Mitigation Plan for Nutrient Neutral Development August 2025

¹⁹ <https://www.eastleigh.gov.uk/business/developers-how-to-unlock-your-development>

²⁰ https://www.portsmouth.gov.uk/wp-content/uploads/2022/07/Updated_Nutrient_Neutral_Strategy_post_cabinet_version-June22.pdf

²¹ <https://www.winchester.gov.uk/planning/nutrient-neutrality-nitrates-and-phosphates/nutrient-neutrality-what-developers-need-to-know>

²² <https://www.hiwwt.org.uk/Nutrient-Reduction-Expression-Interest-Form>

²³ <https://www.ashford.gov.uk/news/latest-news/milestone-for-stour-environmental-credits/>

²⁴ <https://www.gov.uk/government/publications/natural-englands-nutrient-mitigation-scheme-for-developers/poole-harbour-catchment-how-to-apply-for-nutrient-mitigation-credits-from-natural-england>

²⁵ <https://www.gov.uk/government/publications/natural-englands-nutrient-mitigation-scheme-for-developers/tees-catchment-how-to-apply-for-nutrient-mitigation-credits-from-natural-england>

²⁶ <https://www.norfolkenvironmentalcredits.co.uk/buying>

*Nutrient neutrality credits are currently priced at £6,050+VAT. These costs are for 0.1kg/yr Total Phosphorus (inclusive of up to 1.0kg/yr of Total Nitrogen mitigation). Development sites requiring greater than ten times Nitrogen to Phosphorus will pay a higher base cost for credits to reflect the additional Nitrogen mitigation being supplied.

Using the above examples, it would suggest that nitrogen credits cost on average **£2,926 per kg**. The median cost is **£3,000 per kg**. Portsmouth City Council recommends 0.8kg of credit per dwelling (assuming the development is on brownfield land). Hampshire suggests one nitrate credit is broadly in the range of one credit per home.

The cost of Phosphate credits varies between **£34,061 and £100,000 per kg**. Points to note include:

- Somerset Council P-credits are available in the River Tone and River Parrett catchment and are allocated, maintained and monitored by the Council. As of June 2025, one Somerset Council P-credit costs £34,061. Prior to this, the cost of a River Tone P Credit was £53,652 per P-credit.
- Winchester City Council prices P-credits depending on the location of the development site. This is because Phosphate credits used need to be generated upstream of the development site and there is currently a shortage of suitable Phosphate credits for some locations – these credit prices are aligned with other providers in the market.

The Winchester City Council Local Plan Viability Report (July 2024) outlines the two key catchment areas within the district – the River Itchen Catchment Area and the East Hampshire Catchment Area (remainder of plan area). The River Itchen Catchment Area requires both nitrates and phosphates mitigation with the remainder of the plan area requiring nitrate mitigation only. Paragraph 3.27 states: “Following discussion with the Council and review of locally active mitigation (credit) schemes, we have assumed a cost of **£11,250 per dwelling** (Itchen – total for nitrates and phosphates) and **£5,365 per dwelling** (nitrates only).”²⁷

Financial Viability: Nutrient mitigation, required to achieve nutrient neutrality under the Conservation of Habitats and Species Regulations 2017, can be identified in development viability assessments as an abnormal cost. This is because these requirements are site-specific, legally mandated for certain catchments, and often require off-site investment (e.g., land purchase for wetlands), they are treated as exceptional costs rather than standard construction costs.

Residual Land Value (RLV): If the RLV falls below the benchmark land value (the price a landowner expects), the scheme becomes unviable.

Impact on Site Acquisition: The cost of mitigating nutrient loads must be factored into land purchasing, often leading to lower land values to account for the necessary mitigation.

Cost Implications: The County Council has generally included an on-site allowance of £1,500 per dwelling in the Financial Viability Report 2024 **SD28** (paragraph 5.30a) £1,500 per dwelling for SuDS adoption costs.

In terms of offsite mitigation this is a difficult matter to comment on with any great precision as the whole subject area of how to deal with nutrients continues to evolve.

There are several uncertainties at present in terms of identifying a likely cost per dwelling namely:

- The approach to mitigation will vary from site to site and be subject to more detailed analysis prior to an applicant submitting their nutrient load mitigation requirement and their strategy to deal with it with their application.
- Approaches will vary depending on what is mandated by Natural Resources Wales at any particular time. Addressing nutrient issues has been and is in a state of flux with regard to locations and what the expectations are as set out in advice from both Welsh Government (latest DTA informed research and policy advice to be published soon) and Natural Resources Wales. NRW advice has also been updated recently on its website. Guidance now acknowledges the

²⁷ <https://www.localplan.winchester.gov.uk/assets/attach/1146/LPV01-WCC-LP-Viability-Report-July-2024.pdf>

potential for other approaches other than nitrate neutrality. Further edits to NRW guidance will likely be necessary to accommodate the emerging policy guidance from Welsh Government.

- Any tailored nutrient mitigation/restoration scheme operated in Pembrokeshire may use different recovery costings than those currently used in England – work for the Council is currently being commissioned (February 2026).
- Developer led mitigation may prove more cost effective than using a nutrient credits scheme type approach.
- What specific developer led mitigation/restorative approach in relation to phosphates will be recommended from the ongoing work of the Nutrient Management Boards is not yet decided. The Nutrient Management Plan for the Afonydd Cleddau²⁸ refers to developer mitigation while the Teifi Nutrient Management Plan²⁹ does not.
- There may also be 'layering' or 'stacking' opportunities available where both phosphate and nitrate mitigation are in play.

Treatment in Assessments: While high-level, plan-wide viability assessments might use "average" costs, nutrient mitigation often falls outside these averages due to its high, site-specific nature, requiring specific, detailed assessment.

Mitigation Costs in BLV: The Benchmarking Land Value (BLV) should ideally reflect the implications of these abnormal costs. The approach involves applying the 'residual method' whereby the market values of completed new build dwellings are assessed, from which the costs of completing the development (including developer profit, finance and planning policies) are deducted. This leaves a 'residual', which is the price that the developer could pay to acquire the land (known as the 'residual land value').

Separately, a 'benchmark land value' is established, which can be defined as "a land value sufficient to encourage a land owner to sell for the proposed use" The definition in the Development Plans Manual (at the bottom of page 138) (SD66).

The Benchmark Land Values for the Pembrokeshire County Council Local Development Plan 2 Financial Viability Report do not reflect these costs as it was derived prior to the fuller implications of nutrient mitigation have begun to emerge through this work in preparing for the LDP 2 Examination. Appendix D of the Financial Viability Report 2024 (SD28) shows the limited financial headroom available – see second last column titled 'Surplus/Shortfall per unit*'.

Also to note that the Financial Viability Report 2024 (SD 28) for the Council advises at paragraph 5.29: *Accordingly, whilst the high-level assessments in this Study contain an allowance for normals. 106 obligations and SuDS requirements, which a developer can anticipate from the policies in the LDP and any relevant supplementary Planning Guidance, they do not make allowance for "abnormal" obligations.*

Planning Practice Guidance in England³⁰ states that the benchmark land value should be based on the existing use value plus a premium. The level of benchmark land value needs to reflect the level of abnormal / infrastructure costs which impact on the site, the professional fees and also the planning policy requirements. This advice is also included in the document 'Financial Viability in Planning Guidance for Wales (July 2025) prepared by Andrew Burrows.

Nutrient mitigation costs are considered to be 'fixed' in an assessment when required (and therefore not subject to viability). In this sense, they impact on a viability appraisal much like an abnormal cost (such as enhanced foundations, decontamination etc.). As per the requirements of available guidance, it must therefore be appropriate to at least consider adjusting the benchmark land value (i.e. reduce this figure) to reflect the added Nutrient mitigation costs.

For Pembrokeshire, however, Andrew Burrows, the Council's Viability Consultant, advises that there is considered to be insufficient margin in benchmark land values across the County (ranging from £10,000

²⁸ <https://thecleddauproject.org.uk/wp-content/uploads/2025/08/Afonydd-Cleddau-NMP-July-2025.pdf>

²⁹ <https://council.ceredigion.gov.uk/ie/ListDocuments.aspx?CId=148&MeetingId=618&LLL=0> attached to agenda item 91.

³⁰ <https://www.gov.uk/guidance/viability> - see section 'How should land value be defined for the purpose of viability assessment?'

to £20,000 per plot/dwelling, but with an average of c.£15,000) to absorb any significant additional cost arising from the demands of nutrient mitigation. If significant additional costs do have to be met, when a solution for dealing with this issue has been established, it is likely that the 2024 Viability Assessments will have to be reviewed – and affordable housing requirements on market-led residential developments reduced – to whatever extent may be necessary to ensure that benchmark land values are “sufficient to encourage a landowner to sell for the proposed use”³¹.

Andrew Burrows also advises that Policy makers at all levels need to be aware of the potential impact that this issue could have on the delivery of both open market and affordable homes, at the very least in the shorter term, if there is too great an expectation of additional costs being absorbed by adjustments to benchmark land values. Landowners (and developers to an extent) may well take a view that sites will not/cannot come forward voluntarily, if costs related to achieving nutrient neutrality, coupled with affordable housing and/or community infrastructure requirements, render proposed developments unviable.

Duration of mitigation effects (Closed ✓)

Output: Note to PEDW

PEDW Query: *Where additional nutrient loadings would arise from the site (i.e. less than 100% stripping), signpost potential suitable on-site or off-site mitigation measure(s) to avoid or reduce adverse effects on the SAC, including the predicted duration of any effects and potential load reductions. (We accept that work on potential mitigation packages and actions are at an early stage, but as much information as possible should be provided to give clarity on how development sites are expected to come forward).*

Council Response: The Council’s Composite HRA Chapter on Appropriate Assessment and the chapter on Mitigation Implementation covers on-site and off-site mitigation. These chapters also cover load reductions potentials for both off site and on-site provisions.

In terms of duration of effects:

On-site: The most appropriate on-site mitigation measures are SuDS, which aim to reduce the volume and speed of runoff entering watercourses, thereby lowering flood risk and improving water quality. They achieve this by slowing flows, promoting sedimentation, and encouraging infiltration, allowing rainfall to percolate into the ground close to where it falls. Includes basins and ponds, filter strips and swales, constructed wetlands, soakaways, infiltration basins, gravelled areas, and porous paving.

For example the draft Marine and Estuarine DIN Mitigation Strategy document outlines the substantial evidence on nitrogen benefits of certain SuDS approaches, if correctly implemented, and is a suitable on-site approach for developers to reduce surface water nitrogen in runoff from their site. Similarly SuDS can be effectively used for phosphate mitigation on site. More detail is provided in the Habitats Regulations Assessment.

Section 6.1.7 of the draft Mitigation Strategy requires that developers confirm how mitigation will be secured (conditions or legal agreement). This will include outlining responsibilities for the SuDS and how they will be maintained in perpetuity.

Appendix 5 of the draft Mitigation Strategy also outlines the time to effectiveness: *“Time to effectiveness varies by SuDS type. Vegetation-dependent systems require time for plants to establish before achieving full nutrient removal, while hard-engineered measures such as permeable surfaces are effective immediately.”* Furthermore, the ability of SuDS to remove nutrients from surface water runoff varies significantly depending on the type of system and its design. Nutrient removal is primarily achieved through processes such as plant uptake and microbial activity within vegetated or permeable features. The duration of these effects and potential load reductions is dependent on the maintenance and management of the SuDS features so they continue to perform as intended. Maintenance requirements are dependent on the feature, but may include:

³¹ From the definition of Viability on page 138 of the Development Plans Manual

- Desilting.
- Seasonal trimming and vegetation removal.
- Seasonal litter and debris removal.
- Visual inspection (annually).
- Monitoring of inlet and outlet water quality is recommended.

Permeable pavements need to be regularly cleared of silt and debris to ensure permeability is preserved, current advice is a minimum of three surface sweepings per year. Removal of weed growth should occur every 3 months and should have ongoing monitoring for poor operation. If filter media are included in SuDS treatment trains, which can deliver high nitrogen removal rates, then periodic replacement of the media is likely to be required. Timescales for replacement depend on the product in question.

SuDS must be maintained according to statutory SuDS Standards for the lifetime of the development to ensure nutrient removal rate is maintained. A maintenance plan should be secured to provide certainty for appropriate assessment, and should clearly identify who will be responsible for undertaking maintenance, this may include:

- The SAB in some cases is required to adopt and maintain the system, subject to conditions.
- Local Authorities may maintain SuDS directly or outsource to contractors, private management companies, or community enterprises.
- Management companies often appointed for long-term maintenance under legal agreements.

Private owners and occupiers may be responsible for maintaining SuDS serving only their property provided systems are simple and easy to manage.

There are risks to long-term performance if the SuDS are not maintained correctly. As such, the arrangement for long term maintenance and responsibility for SuDS must be suitably secured and evidenced in any nutrient mitigation strategy using SuDS.

Off-site: In the absence of strategic scale mitigation solutions and a nutrient credit charging system in Wales, developer led mitigation will be required to ensure future development with a known nitrogen/phosphorous surplus can be mitigated. A common mitigation approach involves changing land use as part of the development site or at an off-site location also within the applicant's control.

The draft Marine and Estuarine DIN Mitigation Strategy³² document outlines how developers must prepare and submit robust supporting documentation as part of the planning application to evidence what mitigation is required, how it will be provided, secured, and maintained for the lifetime of the development. Any mitigation must be secured through appropriate planning conditions and / or legal mechanisms (e.g. Section 106) and implemented in advance of the nutrient impacts occurring, with arrangements in place to ensure long-term compliance.

Engagement with the local planning authority and, where necessary, Natural Resources Wales (NRW) should take place throughout the process but is **particularly recommended once a mitigation solution has been developed but prior to submission of the planning application.**³³

NRW guidance³⁴ requires that applications for development demonstrate how the proposed measures are effective and in place for the lifetime of the development/permitted activity effects, demonstrating how this will be secured, such as legal agreements. It also requires that evidence is provided to show mitigation will be in place when the proposed development becomes active.

The nutrient neutrality mitigation must be in place and functioning when the proposed development or water discharge permit will start to discharge (directly or via a sewerage system)

³² Draft Marine and Estuarine DIN Mitigation Strategy – Developer Mitigation Handbook (Carmarthenshire)

³³ Table 4-2, Draft Marine and Estuarine DIN Mitigation Strategy – Developer Mitigation Handbook (Carmarthenshire)

³⁴ <https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/advice-for-planning-authorities/principles-of-nutrient-neutrality-in-relation-to-development-or-water-discharge-permit-proposals/?lang=en>

to the water environment. If the impact will be phased, it may be that a range of measures may be needed to address impacts over time.

The adopted mitigation measures should be secured in perpetuity (typically for 80-125 years) and must demonstrate a quantifiable and reliable reduction in nitrogen/phosphorous to the affected SAC, supported by evidence and referring to best practice advice from NRW.

The NRW guidance reflects the nutrient neutrality principles issued by Natural England³⁵. This highlights that there may be instances where reasonable scientific doubt remains around the effectiveness of a mitigation measure (e.g. an extremely novel form of mitigation). In such instances it may not be possible to use this type of mitigation until further evidence is collected to provide a sufficient level of certainty, e.g. the measure is put in place and the efficacy monitored before it is relied upon in an Appropriate Assessment.

The Natural England principles also require that mitigation measures are preventive in nature to avoid effects in the first place rather than offset or compensate for damage. Temporally, this means that:

- Consideration will need to be given as to (i) when the measures will come online and into effect and (ii) when the pollutants come online as the impact may be phased and take place over the lifetime of a development, rather than on day one. **It may be that a range of measures may be needed to address impacts over time.**
- There may be cases where nutrient neutrality is not, at first, achieved because there is a time lag between the initial effects from the plan or project at the Habitats site compared to the benefits of neutrality measures (on-site or off-site) being felt at the Habitats site. One option is to **consider whether bridging measures or reasonable restrictions on occupation or phasing could close that time lag** so that neutrality can be achieved.

Table 5-1 in the Draft Marine and Estuarine DIN Mitigation Strategy provides a long list of options for consideration at the development scale. This table is summarised in Appendix 3, with a focus on the predicted duration of any effects and potential load reductions.

The draft Marine and Estuarine DIN Mitigation Strategy Appendix 5 provides further details regarding the time to effectiveness for the off-site options and how each option performs over time. The key options are outlined below.

Land use change

The time required for land use change to deliver nutrient mitigation benefits varies depending on the chosen approach:

- **Taking agricultural land out of use:** This can be implemented relatively quickly, as the main time investment lies in identifying suitable land, securing willing landowners, and negotiating legal agreements. Once agricultural activity ceases, reductions in nutrient inputs occur almost immediately.
- **Woodland establishment:** Creating new woodlands requires several years for trees to become fully established and deliver maximum nutrient uptake and storage benefits. Early benefits begin as trees grow, but full effectiveness is achieved over the long term as canopy cover and root systems develop. It should be noted that for nutrient neutrality, mitigation must be in place and functioning when the development begins to discharge. Measures with delayed effectiveness may not meet this requirement without interim mitigation or Grampian conditions.

³⁵ Nutrient Neutrality Principles, First published August 2022, Natural England Technical Information Note TIN186

- **Agro-forestry systems:** When agricultural land is converted to agro-forestry (trees integrated into farming systems), the tree species selection is critical. Faster-growing species will remove and store nutrients more quickly than slower-growing species, accelerating the mitigation effect.

Since land use changes should be permanent, authorities require clarity on how the mitigation will be monitored and enforced over time. To achieve this, the land must follow a prescribed management regime for 80–125 years, with an expectation that its nutrient mitigation function continues in perpetuity. This long-term commitment ensures that the benefits of land use change are sustained and verifiable.

Developers should include a detailed maintenance and monitoring plan within their mitigation proposal. This plan must outline how the land will be managed throughout its lifetime, specifying activities, responsibilities, and reporting requirements. Details of how this plan would be secured are essential to having certainty in the long-term effectiveness of the mitigation approach.

Temporary agricultural management measures such as fallowing of land, cover crops, provision of buffer strips can offer a quicker way to reduce nutrient levels initially, but these measures if not secured in perpetuity cannot be used as long-term nutrient neutrality mitigation. However, developers could use these types of measures as a short (fixed) term interim mitigation measure before the in-perpetuity measures become effective.

Agricultural management measures

The time required for agricultural management measures to deliver nutrient mitigation benefits varies depending on the chosen approach but can generally be implemented in the short to medium term. Cessation of fertiliser and manure application/planting of cover crops can be implemented relatively quickly, as the main time investment lies in securing willing landowners. **Once agricultural activity decreases, reductions in nutrient inputs occur almost immediately**, particularly during rainfall events. This method does not require any investments in infrastructure or planning permission.

Legal agreements would need to specify the area and duration of fertiliser cessation, and periodic monitoring checks would be required to verify farming practices and monitor nutrient levels in runoff. This is likely to comprise three to four visits per year, including an initial round of sampling (incorporating seasonality) to establish the baseline conditions.

Treatment wetlands

Before nutrient mitigation can occur, it is estimated that a **treatment wetland scheme for nutrient removal will take between 1-2 years to complete** due to various design, planning, permitting, and construction requirements.

Once commissioned, the removal of nutrients requires vegetation and biofilms (communities of microorganisms, including bacteria and fungi, that attach to surfaces) to become established. As such, consideration may need to be given to phasing of development, interim measures or conservative assumptions to ensure that mitigation is effective at the point when development discharges commence.

The developer must be able to demonstrate the capacity to manage, monitor, and maintain the treatment wetland for its lifetime. Treatment wetlands used for nitrogen and phosphorous mitigation require ongoing management to sustain design performance and removal efficiency. Seasonal vegetation management (e.g., harvesting, litter removal) is essential, and proposals should include maintenance plans that address these needs. Periodic interventions, such as sediment removal every 5 to 10 years and vegetation management according to their seasonal growth stages, help prevent wetlands from shifting from nutrient sinks to nutrient sources. Maintenance plans should also cover upkeep of hydraulic structures and bed and bank stability.

Due to the complexity of characterising flows and loads accurately, post-implementation monitoring is essential. Demonstrating the **full nutrient removal potential of a wetland may take more than 1 to 3 years**, as performance stabilises over time.

The nutrient removal efficiency of constructed wetlands is not constant and **typically fluctuates with seasonal changes**. Removal rates are generally lower in autumn and winter due to reduced biological activity and higher in spring and summer when conditions favour plant growth and microbial processes.

The body of evidence on long-term performance remains limited, with few studies assessing nutrient removal efficiency beyond a 10-year operational period. However, available research suggests that performance can be maintained at an optimum level with a robust and consistent maintenance schedule.

Other wetlands

For wetlands treating agricultural runoff, they are likely to be the least complex in terms of design, planning, and permitting, making them **relatively fast to deliver**, especially compared to treatment wetlands. Nutrient removal begins after vegetation establishment, which is the primary mechanism for nutrient uptake.

Nutrient reduction is possible through monitored performance or understanding of nutrient load from the land-use of the area in question. Treatment wetlands offer greater certainty in perpetuity.

SuDS in rural locations

Rural SuDS typically operate at a larger scale and integrate with natural landscapes. Nutrient removal begins immediately upon installation for interception or diversion SuDS. For features using vegetative interception and nutrient uptake, the vegetation establishment is required before its function.

If rural SuDS are not maintained in accordance with their basic guidelines, they will no longer treat runoff and will not secure nitrogen/phosphorous mitigation

Field boundary management

Common interventions include riparian buffer strips, hedgerow re-establishment and field buffers. Typically, nutrient removal begins once vegetation has established.

Where buffer strips are implemented, long-term nutrient mitigation relies on maintaining the strip in a way that prevents changes which could reduce effectiveness.

Enhanced drainage ditch management

The design of the enhanced drainage ditch approach was developed by Greenshank Environmental and endorsed by Natural England. In Wales, it will be necessary to engage with the relevant LPA on a case-by-case basis to ascertain suitability for a development. Nutrient removal begins typically within the first growing season once vegetation establishes.

On a long term performance basis, the process of nitrogen removal from agricultural drainage is dependent on microbial denitrification, which will exhibit variable rates depending on seasonal climate and the residence time (i.e., improved removal under low-flow and warmer conditions).

Willow systems

Willow systems are wetland basins that are dominated by willows, for 100% evapotranspiration to air in summer and full storage in winter. Nutrient uptake rates could be poor initially, but this will improve with time as the willows get larger and their growth rates increase.

Where willow systems are implemented, long-term nutrient mitigation relies on maintaining the system in a way that prevents changes which could reduce effectiveness. Half to one third of the system will need to be harvested every two to three years. A comprehensive maintenance plan including silt removal measures will need to be submitted as part of the design.

Establishing willows early provides evidence that the system is functional. Legal agreements or management plans, combined with ongoing monitoring, offer a practical method to demonstrate the system will remain effective in perpetuity and secure the nutrient mitigation benefit. **Willow systems will improve with time as willow growth rates increase**. This option gives high longevity (assuming the willow system is secured in perpetuity through S106 agreements) and certainty if it is possible to secure monitoring to confirm that this is maintained.

Task 2. Infrastructure and Task 4. Sites (Closed ✓)

<p>Output: Implementation Appendix & Statement of Common Ground (Closed ✓)</p>	<p><i>Output: see separate pdf documents</i></p> <p><i>Financial Viability Report Addendum Feb 2026 (Closed ✓)</i></p> <p>ED10a</p> <p><i>Appendix A – Viability Guidance Note for Wales (Closed ✓)</i></p> <p>ED10b</p> <p><i>Appendix B – Updated Key Sites FVAs (Closed ✓)</i></p> <p>ED10c</p> <p><i>Implementation Appendix (Closed)</i></p> <p>ED10d</p>
<p>Discrepancies between site capacities for key sites in Appendix F FVR & Policy GN 16 ✓</p>	
<p>PEDW Query:discrepancies between the site capacities for ‘key sites’ identified in policy GN 16 versus those shown in Appendix F of the Financial Viability Report.</p> <p>Council Response:</p> <p>The differences between Policy GN 16 Allocations and Appendix B of the Financial Viability Report Addendum are</p> <ol style="list-style-type: none"> 1. That the Financial Viability Report Addendum Appendix B is prepared for the whole site (including land beyond the Plan period) for the following sites. <ul style="list-style-type: none"> ▪ Cilgerran: Tan Ffynnon Fields ▪ Clunderwen: South of Bro'r Dderwen ▪ Pembroke: North of Gibbas Way ▪ Johnston: North of Hayston View ▪ Milford Haven: South of Conway Drive, Castle Pill Road, Steynton, 2. That the Financial Viability Report Addendum Appendix B is prepared for the land being promoted by Welsh Government for Slade Lane Haverfordwest. 	
<p>Allocations rolled forward – evidence of substantial change in circumstances (Closed ✓)</p>	<p><i>Output: Note to PEDW – see below</i></p>
<p>PEDW Query: ...It adds that for allocations rolled forward from a previous plan, there will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again.</p> <p>Council Response: Appendix 8 Allocations rolled forward – evidence of substantial change in circumstances – presents the evidence for substantial change in circumstances. For each allocation of the Plan, it sets out whether it:</p> <ul style="list-style-type: none"> ▪ Has been rolled forward from the previous plan ▪ Was submitted as a LDP 2 candidate site ▪ Has a recent planning application history ▪ Has been subject to a recent change of ownership ▪ Has seen a major development constraint recently removed or mitigated ▪ Relates to a site being prepared for development ▪ Has been subject to emerging Freeport proposals 	

- Has been subject to any other matters pertaining to the Inspectors' question

The Appendix gives an indication of the circumstances that have persuaded the Council to continue to allocate (sometimes in modified form) various previously allocated sites.

	<p><i>Output: Phasing PDF</i></p> <p>Phasing of Allocations.pdf ED11 (Closed) ✓✓</p>
<p>Evidence of approach to phasing (Closed) ✓✓</p>	

PEDW Query: *Whilst the Council have set out the results of its candidate site assessments (SD08.1-SD08.6) and housing supply and trajectory (SD46), there is little detail demonstrating the delivery of housing site allocations. This includes a lack of evidence justifying the phasing of individual sites, or site promoter statements including any information on preliminary site surveys, for example.*

Council Response: Please see Phasing of Allocations document – link above.

	<p><i>Output: see separate pdf documents</i></p> <p>Renewable Energy GN 5 (closed ✓) ED12a Employment Allocations GN 9 (closed ✓) ED12b Gypsy Traveller Allocations GN 24 (closed ✓) ED12c Trefigin Quarry Extension GN 37 (closed ✓) ED12d Housing/Residential Alloc. GN 16 Settlements B-K ED12e Settlements L-M ED12f Settlements N-W ED12g (closed ✓) Mixed Use GN 10 (Closed ✓) ED12h Specialist & Support Alloc GN 23. (Closed) ED12i Strategic Emp SP 14 (closed ✓) ED12j</p>
<p>Development Sites SPG query (Closed ✓)</p>	

PEDW Query: *The Sustainability Appraisal and Strategic Environmental Assessment Report (SD02.1) refers to a Development Sites and Allocations SPG,*

The query goes on to say that this document has not been submitted.

Council Response: The Council has prepared a series of draft site files for allocated sites in the Plan for the benefit of the Examination – see separate PDFs listed above.

Some sites files have not been included as they require further work.

These are:

- Community Facility Allocations: New Primary and Secondary Schools, Milford Haven and New Primary School, Slade Lane, Haverfordwest
- Cawdor Barracks including the former Brawdy Airfield

To note the **Community Facilities** allocation sites will be driven by the needs of the Council's Education Department and further work will be needed corporately before such files can be completed and may be overtaken by the need for corporate master planning for driving forward delivery. Also to note sites subject to Focussed Changes are included in the bundles rather than the sites as proposed at Deposit Stage.

Policy GN 7 – Cawdor Barracks including the former Brawdy Airfield: This site remains in military use, but it is also on the Defence Infrastructure Organisation's Disposals Database in the House of Commons Library. The Ministry of Defence is continuing to consider the future use of the site. It is possible that it will be disposed of, in part or whole, in the future. That could happen during the LDP 2 Plan period or beyond it. It is also possible that it will be retained, in part or whole, by the Ministry of Defence.

The LDP 2 policy relating to the site has been put in place to provide a policy framework for consideration of future uses of the different parts of the site, for use if disposal in part or whole by the MoD / DIO takes place during the LDP 2 Plan period.

The emerging DARC project at this site makes it very difficult to complete a LDP 2 site file at present. Once the key decisions have been made regarding this project, the position should become clearer.

Policy GN 7 of LDP 2, Deposit Plan 2, as modified by the LDP 2 Focussed Changes, sets out a detailed policy framework for the potential re-use of the different parts of the site. It will only be used if disposal of the site by the DIO takes place, in part or whole, which may or may not happen.

Appendix 3 to LDP 2 lists items of Supplementary Planning Guidance that may be prepared to support the policies and proposals of LDP 2. One of the items listed is a Development Brief for Cawdor Barracks, including the former Brawdy Airfield. Detailed consideration will be given to what is required after the adoption of LDP 2. Clearly, this will be strongly influenced by the latest position of the MoD / DIO regarding current and possible future uses of the site and its possible partial or full future disposal.

For information, there is a 'Brawdy airfield - Landscape and Visual Appraisal of Potential Wind Energy Development - June 2021' study, prepared by White Consultants, which forms a part of the LDP 2 evidence base.

There is also an earlier study, prepared by Arup consultancy, relating to the possible re-use of this site. It was prepared in 2015 and provided a foundation for drafting LDP 2's policy GN 7, albeit that the emerging policy position has evolved considerably since 2015. This comprises an 'Initial Findings Presentation' from March 2015, a Scoping Study titled 'Future Uses Phase 1 - Consideration of Uses and Market Testing' from May 2015 and a further document titled 'Summary of Phase 1 and Scope of Phase 2', also from May 2015.

The 2015 consultancy study documents are not in the LDP evidence base, but could, if necessary, be added to it.

The site files will eventually form part of a draft Development Sites and Allocations SPG which subject to approval by Cabinet will be published for consultation following Local Development Plan adoption.

PEDW Query: *Whilst the Council have set out the results of and enhancement on allocated sites, in support of Policy SP 12. However, neither document has been submitted to the examination.*

Council Response: The full text of the Inspectors' question on this matter is as set out below:

LDP 2, Deposit Plan 2 (SD01.1) Policy SP 12, reasoned justification paragraph 4.71 refers to the Biodiversity Supplementary Planning Guidance document. This says that 'The Biodiversity SPG will assist in identifying opportunities for enhancements for a range of proposals. Pre-application engagement with the Council will also enable appropriate and site-specific enhancements to be identified.'

There are further references to the Biodiversity SPG in paragraph 4.60 of the same document (reasoned justification to policy SP 11 on the Countryside) and in paragraph 5.16 (reasoned justification to policy GN 1 – General Development Policy).

In Appendix 3 of LDP 2, Deposit Plan 2, a table of items of SPG to support LDP 2 is presented. This refers to the SPG item on Biodiversity and cross-references it to policies SP 11, GN 1, GN 41 and GN 44, all of which is logical.

However, there is no reference to SP 12, and this is clearly an omission that needs to be corrected through a **Matters Arising Change**.

Appendix 3 of Local Development Plan 2 advises that there is an existing Biodiversity SPG document, which as things stand supports the current LDP (adopted in 2013). This item of SPG was adopted by the Council in May 2021, but clearly post adoption of LDP 2 will need to be revised to bring it into line with LDP 2 policies / proposals and to incorporate any amendments deemed necessary to reflect changes in circumstances since 2021.

A copy of the current Biodiversity SPG³⁶ can be made available to the Inspectors if required – and as a corollary to that, could be added to the Examination Library.

³⁶ https://www.pembrokeshire.gov.uk/objview.asp?object_id=9965&language=

What is a key site for viability assessment clarification?
(Closed ✓)

Output: Note to PEDW – see below

Council Response: The Development Plans Manual³⁷ requires that sites allocated in the Development Plan which are integral to the delivery of the plan are identified as 'key sites'. (See paragraph 5.127)

These sites are subject to a more detailed assessment and to ensure there are no fundamental barriers to their delivery.

As a starting point the Council identified sites of 50+ to be 'key sites' for LDP2 – see Appendix 4 Key Sites & Viability.

Appendix 4 Key Sites & Viability **Error! Reference source not found.** provides a full list of sites allocated for 50 or more dwellings in Policy GN 16 Housing Allocations.

When carrying out the Financial Viability Appraisal sites where a Registered Social Landlord were likely to bring forward with at least 50% affordable housing, and for which social housing grant was expected to be available, were not considered to require a viability appraisal. (**Reason – RSL**)

Several of the 50 + sites were already allocated in LDP 1 and have been carried forward into LDP2. Some of these sites have since been granted planning permission and therefore a more detailed site-specific viability has already considered as part of the planning application process. These sites are also excluded from the list of Key Sites which were subject to a viability assessment. (**Reason – PP**)

Appendix 4 Key Sites & Viability' to this report shows the results of the process outlined above and identifies those 'key sites' in LDP2 that were included in the Viability Appraisal, that were not included because they were identified as a potential RSL sites where 50% or more affordable housing could be achieved or where the site already had planning permission with more detailed viability appraisal supporting the affordable housing percentage chosen.

³⁷ <https://www.gov.wales/sites/default/files/publications/2020-03/development-plans-manual-edition-3-march-2020.pdf>

Tasks 3.5.6.7.8 (all closed ✓ – see below)

Flooding (Closed ✓)

Output: Note to PEDW

PEDW Query: We ... seek a comprehensive background paper on this matter which explains:

- How the two SFCAs have informed the strategy and selection of allocated sites, and
- How the LDP accords with the requirements for development plans identified in the 2025 version of the TAN.

If applicable, this assessment should inform the infrastructure plan sought under (2), as set out in para 10.5 of the TAN.

Council Response: Please see Appendix 7 Strategic Flood Consequence Assessment compliance with Technical Advice Note 15 (TAN15): Flooding and Coastal Erosion.

BMV (Closed ✓)

Output: Note to PEDW

PEDW Query: The Welsh Government representation to the second Deposit Plan consultation advised that the Agricultural Land Classification background paper (SD50.1 and SD50.2) should be reviewed to include a summary of how best and most versatile agricultural land policy is evidenced and justified in the plan, including the weight given to best and most versatile (BMV) land in site assessments, and how BMV policy has been applied to the spatial strategy and site selection. Has this work been undertaken, and if not, why?

Council Response: The Council's response on this issue can be found in SD09.5 Issues Report Appendix 4 to the Consultation Report on the Deposit Plan and Part 4 Other Edits to the Focussed Changes Consultation documentation (SD05.3). Section 4.1 of the Issues Report, page 2 onwards sets out the summary of issues raised in relation to BMV. Paragraphs 3 to 5 provide an overview of how BMV has been considered. In summary, a high proportion of the Plans settlements are heavily constrained by BMV so the ability to have a choice between BMV and non BMV land is very limited and often non-existent. OE10 in SD05.3 sets out the additional text that can be added to the Agricultural Land Background Paper.

Previously Developed Land (Closed ✓)

Output: Note to PEDW

PEDW Query: PPW sets out a site search sequence which prioritises the use of suitable and sustainable previously developed land and / or underutilised sites. Given that a significant proportion of development is proposed on greenfield sites outside of existing settlement boundaries, clarification is sought on the following:

- What proportion of development (on allocations and committed sites) is proposed on previously developed land through the plan period? And
- What is the evidence to justify the release of greenfield sites and support windfall site delivery assumptions (e.g. studies of the urban capacity of designated settlements)? Similarly, does the Council have a register of suitable sites which fall below the threshold for allocation in the LDP? (see paragraph 5.63 of the DPM).

Council Response:

Previously Developed Land: The main land uses that require a significant hectareage of land are housing and employment provisions to meet the requirements set out in the strategic policies of the Plan. The Council is making a housing provision, estimated 6,425 housing units for Pembrokeshire, to meet a housing requirement of 5,840 (Policy SP 2 Housing Requirement). This is made up of allocations, commitments and an anticipated windfall provision.

The Council is also required to make provision for employment to support prosperity and growth across Pembrokeshire (an estimated 1970 jobs/164.91 hectares allocated) – Policy 5 Supporting Prosperity. Other

proposed allocations and safeguarded sites are also included. The Council also needs to factor in constraints on bringing sites forward to ensure deliverability over the life of the Plan.

In terms of previously developed land contributions to overall site selection for the Plan the question is answered in two parts, first in terms of proportions of sites that came through the candidate site process and then the remainder of the supply as identified in the Plan.

Previously Developed Land & Candidate Sites: In terms of sites proposed through the Candidate Site process; where the landowner is considered to be signalling an intention to deliver; overall, the percentages for brownfield submissions are lower relative to greenfield sites (405.04 hectares of brownfield 35% versus 695.35 hectares 60% for greenfield). A mix of greenfield and brownfield accounted for 60.26 hectares – 5%.

Table 5 All Candidate Sites Brownfield, Greenfield and Both

All Candidate Site Submissions ³⁸	Both Hectares	%	Brownfield Hectares	%	Greenfield Hectares	%	Grand Total Hectares
Community Facility		0%	0.61	9%	6.49	91%	7.1
Employment	15.31	24%	8.78	14%	39.85	62%	63.94
Marina		0%	1.82	100%		0%	1.82
Mineral		0%		0%	32.95	100%	32.95
Mixed Use	2.61	18%	7.95	55%	3.77	26%	14.33
Mixed Use (including Residential)	7.44	2%	316.54	82%	62.67	16%	386.65
N/A		0%	0.06	100%		0%	0.06
Open Space		0%		0%	2.01	100%	2.01
Protect Existing		0%	3.04	18%	13.68	82%	16.72
Residential	23.98	4%	29.32	5%	490.89	90%	544.19
Retail		0%	0.35	100%		0%	0.35
Safeguarding	4.68	38%	0.92	7%	6.85	55%	12.45
Supported Accommodation		0%	0.2	3%	5.67	97%	5.87
Tourist Accommodation	3.08	13%	0.15	1%	20.7	87%	23.93
Traveller Site		0%	4.69	100%		0%	4.69
Waste		0%	11.85	100%		0%	11.85
(blank)	3.16	10%	18.76	59%	9.82	31%	31.74
Grand Total	60.26	5%	405.04	35%	695.35	60%	1160.65

In terms of sites taken forward as allocations/safeguarded sites, commitments and potential windfall sites the highest percentage is for brownfield sites (347.08 - 65%)³⁹

Table 6 Candidate Sites selected Brownfield Greenfield Both

Candidate Site Category Green 3,4,5 Blue 1,2,3,4 Pink 2	Both Hectares	%	Brownfield Hectares	%	Greenfield Hectares	%	Grand Total Hectares
Community Facility		0%	0.31	29%	0.77	71%	1.08

³⁸ Categories are based on the proposer suggested use for the site.

³⁹ Green 3 within limit Green 4 Allocation – housing; Green 5 Commitment – housing; Blue 1 Non-Res allocation; Blue 2 Trans/Employ/Open Space; Blue 3 within limit; Blue 4 Transport safeguarded site complete; Pink 2a Alt use; Pink 2b Alt use;

Employment	6.91	23%	7.78	26%	15.55	51%	30.24
Marina		0%	1.82	100%		0%	1.82
Mineral		0%		0%	9.3	100%	9.3
Mixed Use		0%	3.98	67%	1.97	33%	5.95
Mixed Use (including Residential)	2.44	1%	311.16	92%	22.96	7%	336.56
N/A		0%	0.06	100%		0%	0.06
Open Space		0%		0%	2.01	100%	2.01
Protect Existing		0%	3.04	84%	0.58	16%	3.62
Residential	8.25	7%	17.58	14%	98.03	79%	123.86
Retail		0%	0.35	100%		0%	0.35
Safeguarding		0%	0.13	2%	6.85	98%	6.98
Supported Accommodation		0%		0%	5.67	100%	5.67
Tourist Accommodation		0%		0%	0.08	100%	0.08
(blank)	2.14	36%	0.87	15%	2.89	49%	5.9
Grand Total	19.74	4%	347.08	65%	166.66	31%	533.48

In terms of Candidate Sites not taken forward 57.96 hectares of brownfield accounted for 9% of the total not taken forward and 528.69 hectares of greenfield or 84% of the total were not taken forward. 40.52 hectares of land with both were not take forward.

Table 7 Candidate Sites not taken forward Brownfield, Greenfield, Both

Candidate Site Category Amber 4, Red 1 to 6, Pink 1, Yellow 1 and 2 ⁴⁰			Brownfield Hectares		Greenfield Hectares		Grand Total Hectares
	Both	%		%		%	
Community Facility		0%	0.3	5%	5.72	95%	6.02
Employment	8.4	25%	1	3%	24.3	72%	33.7
Mineral		0%		0%	23.65	100%	23.65
Mixed Use	2.61	31%	3.97	47%	1.8	21%	8.38
Mixed Use (including Residential)	5	10%	5.38	11%	39.71	79%	50.09
Protect Existing		0%		0%	13.1	100%	13.1
Residential	15.73	4%	11.74	3%	392.86	93%	420.33
Safeguarding	4.68	86%	0.79	14%		0%	5.47
Supported Accommodation		0%	0.2	100%		0%	0.2
Tourist Accommodation	3.08	13%	0.15	1%	20.62	86%	23.85
Gypsy & Traveller Site		0%	4.69	100%		0%	4.69
Waste		0%	11.85	100%		0%	11.85
(blank)	1.02	4%	17.89	69%	6.93	27%	25.84
Grand Total	40.52	6%	57.96	9%	528.69	84%	627.17

The reasons for not taking forward brownfield sites (which would in theory have provided a potential opportunity to be replace a greenfield site) are set out in Appendix 1.

‘Previously Developed Land & Non-Candidate Sites’: For allocations and safeguarding uses other than residential the table below shows the percentages with brownfield proposals dominating the figures:

⁴⁰ Amber - Surplus to requirements; Red 1- Flooding; Red 2 – Dev not being sought here; Red 3 - 250 m from settlement; Red 4 – 250 from settlement and constrained; Red 5 not adj to settlement; Red 6 – site allocated for an alternative use. Pink 1, Constraint Yellow 1 (criteria based policy approach) and 2 Countryside.

Table 8 Non-Candidate Sites other than Housing - Brownfield, Greenfield, Both

Policy Reference	Both Hectares	%	Brownfield Hectares	%	Greenfield Hectares	%	Grand Total
GN 24		0%		0%	4.22	100%	4.22
GN 5		0%		0%	1.55	100%	1.55
GN 59		0%	9.54	100%		0%	9.54
GN 9	23.03	68%	4.11	12%	6.92	20%	34.06
SP 14	44.01	38%	72.03	62%		0%	116.04
SP 15		0%	863.59	100%		0%	863.59
Grand Total	67.04	7%	949.27	92%	12.69	1%	1029

For residential allocations and commitments, that are not included in the Candidate Site figures above, greenfield sites account for 83.52 hectares (72%) of the total with this figure roughly split between commitments and allocations.

Table 9 Non-Candidate Sites - Housing - Brownfield, Greenfield, Both

Type	Both	%	Brownfield Hectares	%	Greenfield Hectares	%	Grand Total
Commitment	4.34	6%	27.56	41%	35.71	53%	67.61
Residential Allocation		0%		0%	8.93	100%	8.93
Strategic Allocation		0%		0%	38.88	100%	38.88
Grand Total	4.34	4%	27.56	24%	83.52	72%	115.42

Windfall provision (Closed ✓)

Output: Note to PEDW

The derivation of housing windfall assumptions for the Plan is set out in the Housing Land Supply & Trajectory July 2024 Background Paper **SD46** sections 8 and 9. The Paper sets out the rationale behind discounting outliers in terms of deriving a forecast, the approach to distribution of the windfall forecast within the settlement hierarchy taking account of/providing commentary on potential opportunities remaining within the settlements. Please note the windfall assumptions in the Background Paper have been updated as a result of the need to prepare an updated Housing Trajectory for Examination.

The Council has used the Candidate Site process to assist with the selection of potential windfall sites to add to the supply within the spatial hierarchy going forward.⁴¹

Table 10 Candidate Sites - Windfall - Brownfield, Greenfield, Both

Green 3 & Blue 3	Both Hectares	%	Brownfield Hectares	%	Greenfield Hectares	%	Grand Total
Employment		0%	2.71	100%		0%	2.71
Mixed Use		0%	1.24	100%		0%	1.24

⁴¹ Green 3 Windfall sites and Blue 3 Windfall non- residential

Mixed Use (including Residential)	2.44	40%	3.59	60%		0%	6.03
N/A		0%	0.06	100%		0%	0.06
Residential	2.08	6%	9.26	26%	24	68%	35.34
Retail)		0%	0.35	100%		0%	0.35
Tourist Accommodation		0%		0%	0.08	100%	0.08
(blank)	0.06	21%	0.23	79%		0%	0.29
Grand Total	4.58	10%	17.44	38%	24.08	52%	46.1

Housing Trajectory New Trajectory (Closed ✓)	<i>Output: see separate pdf document</i> Housing Trajectory Feb 26.pdf√ ED13
Green Wedges Output: Updated Background Paper (Closed ✓)	<i>Output: see separate pdf document</i> Green Wedge Background Paper February 26.pdf ED14
Local Housing Market Assessment (Closed ✓)	<i>Output: Note to PEDW</i>

PEDW Query: *More information is sought on how the LDP has had regard to any relevant local housing strategy (a draft strategy is referred to in the Local Housing Market Assessment but there is no indication whether this had since been adopted and, if so, any implications for the Plan).*

Council Response: As a precursor to answering this question, a brief update of the Local Housing Market Assessment is provided. There are two iterations of the Pembrokeshire LHMA included in the LDP 2 evidence base and the submission documents, these being the LHMA 2021, dated July 2021 (reference **SD26**) and the LHMA 2023, dated March 2025 (reference **SD27**). Confirmation that the latter had been signed off by Welsh Government was received by PCC on the 16th of April 2025.

Reports were presented to Cabinet on 2nd June 2025 and subsequently at Council on 17th July 2025 relating to various matters pertaining to LDP 2 and its associated preparation process, including the preparation of and public consultation on Focussed Changes to LDP 2, Deposit Plan 2.

The reporting cycles for the Cabinet and Council reports referred to above did not provide sufficient time for consideration of the LHMA 2023 document and its implications for LDP 2. However, Focussed Change FC5.GN15.01 (relating to policy GN 15 of LDP 2) did put in place some updates and corrections regarding the findings of the LHMA, but referring to the LHMA 2021 document. This change addressed a) the error of referring to a LHMA 2022 document in LDP 2, Deposit Plan 2, b) provided additional information about adaptable homes / Lifetime Homes Standards and c) more specifically provided more information regarding dwellings suitable for wheelchair users.

Now that the LHMA 2023 is published, further changes are needed to ensure that GN 15 and its reasoned justification reflect the newer document – and likewise that other references to the LHMA in LDP 2 relate to the LHMA 2023 document.

Some of the references to the LHMA in LDP 2, Deposit Plan 2 (as updated by FC5.GN15.01) can remain as currently drafted. However, various Matters Arising Changes are now needed to bring LDP 2 fully into line with the Pembrokeshire LHMA 2023. A summary of what is needed is provided below (this looks at all references to the LHMA in LDP 2 and for completeness includes instances where no further changes to the Plan are needed, as well as to those where Matters Arising Changes are required). Please note also that in the Council's response to the preliminary questions from the Inspectors, some suggestions were made for updating on LHMA matters referenced in LDP 2. The Council has found that more needs to be done in terms of Matters Arising Changes than was envisaged at that time that the preliminary response was prepared, hence for completeness a comprehensive update is provided below, including some aspects covered in the preliminary response.

1. Page 24 of LDP 2, Deposit Plan 2 – Local Context – Pembrokeshire – the population figures set out in bullet point 1 are taken from the LHMA 2021. Therefore, they need to be updated and footnote 10 needs to be amended to refer to LHMA 2023 (not LHMA 2022 as currently drafted).

As currently drafted, bullet point 1 and related footnote 10 say:

Pembrokeshire has an ageing population, and the over 65 population is projected to increase from 32,343 in 2021, to 43,175 in 2033, a rise of 33.5% (some 10,832 people)¹⁰.

¹⁰ See Pembrokeshire's Local Housing Market Assessment, 2022.

The proposed **Matters Arising Change** to the above is as follows:

The 2018-based projections that are used to derive the future accommodation need within the preferred projection variant include data on the age of the future population in Pembrokeshire. These indicate that the population aged 65 or over is going to increase dramatically in the County over the plan period; from 32,343 in 2021, to 43,175 in 2033, a rise of 33.5% (some 10,832 people). The projections also suggest that there will be an increase in the number of households headed by someone over 65 in Pembrokeshire from 20,451 in 2021, 28,331 in 2033, an increase of 38.5%. The projections indicate that the proportion of older persons living alone in Pembrokeshire will decrease from 47.1% in 2021, to 43.9% in 2036'.¹⁰

¹⁰ Paragraph 6.35 of Pembrokeshire's Local Housing Market Assessment, 2023.

2. Page 33 of LDP 2, Deposit Plan 2 – Meeting the Identified (Housing) Need – paragraph 3.6 - this needs to be updated to refer to the LHMA 2023 (not LHMA 2022 as currently drafted). The reference in this paragraph to 18.3% of the total housing stock being available as Lifetime Homes by 2036 remains correct in terms of the percentage figure quoted, but 2036 needs to be updated to 2037 (2036/37 being year 15 of the 2023 LHMA). Similarly, the reference to 4.1% of total housing stock being suitable for wheelchair users by 2036 remains correct in terms of the percentage figure quoted, but 2036 needs to be updated to 2037.
3. Page 40 of LDP 2, Deposit Plan 2 – Policy SP 2 – Housing Requirement – paragraph 4.11, bullet point 3 of the reasoned justification needs to be amended, to refer to the LHMA 2023.
4. Page 41 of LDP 2, Deposit Plan 2 – Policy SP2 – Housing Requirement – paragraph 4.14 of the reasoned justification - a Focussed Change (**FC4.SP03.01**) has already been proposed to provide details of the annual requirement to meet affordable housing needs. This is taken from the Local Housing Market Assessment 2023.

The proposed Matters Arising Change is as follows:

No further change is required beyond referencing the Local Housing Market Assessment 2023 as being in its final form – by deleting the word 'Draft' from the table in FC4.SP03.01 and replacing it with the word 'Final'.

5. Page 121 of LDP 2, Deposit Plan 2 – Policy GN 15 – Housing Mix, Second Homes and Short-term Holiday Lets, Space Standards and requirements for Lifetime Homes Standards – paragraph 5.94 (reasoned justification to policy GN 15) – the reference to the LHMA here remains fit for purpose and no further change is needed.'
6. Page 122 of LDP 2, Deposit Plan 2 – Policy GN 15 – Housing Mix, Second Homes and Short-term Holiday Lets, Space Standards and requirements for Lifetime Homes Standards – paragraph 5.99 (reasoned justification to policy GN 15) - this paragraph of LDP 2, Deposit Plan 2 has been modified by Focussed Change FC5.GN15.01. The Focussed Change corrects various errors in LDP 2, Deposit Plan 2 in relation to the LHMA, but the revisions relate back to the LHMA 2021, hence further updates are needed to bring the whole paragraph into line with LHMA 2023.

Paragraph 5.99, as modified by Focussed Change FC5.GN15.01 (grey highlight) currently says:

The Council has identified an ageing population as a key issue for LDP 2. Alongside the trend for increasing numbers of over-65s is a trend for an increasing need for properties to be adaptable and (to) potentially accommodate wheelchairs. Paragraph 6.31 of the Local Housing Market Assessment 2021 advises that 'Overall, the requirement for 10,901 adaptable homes implies that a notable uplift will be required to the number of homes that meet this standard currently, and that by the end of the Plan period around about 18% of the total housing stock should be available that meet this requirement'. On this basis, 20% of properties on sites of 5 or more must be built to Lifetime Homes standards. Where market properties are proposed on a site, the percentage requirement will apply to the market properties specifically as Lifetime Homes standards is a requirement of Welsh Development Quality Requirements 2021. Lifetime Homes standards ensure that two-storey properties have a standard wheelchair-accessible ground-floor and that the stairs are straight to potentially accommodate a stair lift without a need for a bespoke track. Bungalows built under these standards have a wider turning circle in the hall areas. Ensuring an appropriate mix of properties to meet the needs of the population is a critical element of ensuring that the Council meets the requirements of the Health and Well-being Act. In addition, paragraph 6.34 of the Local Housing Market Assessment 2021 advises the that 'Overall, the requirement for 2,425 wheelchair user dwellings will mean that by the end of the Plan period, around 4.0% of the total stock should be available to meet this requirement'.

The proposed **Matters Arising Change** to the above is as follows:

5.99 The Council has identified an ageing population as a key issue for LDP 2. Alongside the trend for increasing numbers of over-65s is a trend for an increasing need for properties to be adaptable and (to) potentially accommodate wheelchairs. Paragraph 6.11 of the Local Housing Market Assessment 2023 advises that 'In total 11,518 adaptable homes are required in 2036 in Pembrokeshire, of which 7,014 should be in the market sector and 4,504 in affordable accommodation. Of the 11,518 adaptable homes required, 9,957 should be in the general housing stock and 1,561 in supported accommodation.' Paragraph 6.12 adds that 'Whilst the future requirement for Lifetime Homes has been identified, there is limited information on the number of dwellings that fulfill this criterion in Pembrokeshire and therefore there is not a detailed profile of the current stock from which to derive a net requirement. However, the Regional Housing Market Assessment for South West and Mid Wales report estimates that there are currently around 7,000 such homes that fulfill this criterion.' Paragraph 6.13 concludes that 'Overall, the requirement for **11,518** adaptable homes implies that a notable uplift will be required to the number of homes that meet this standard currently, and that by the end of the plan period around about 18.3% of the total stock should be available that meet this criterion.' On this basis, 20% of properties on sites of 5 or more must be built to Lifetime Homes standards. Where market properties are proposed on a site, the percentage requirement will apply to the market properties specifically as Lifetime Homes standards is a requirement of Welsh Development Quality Requirements 2021. Lifetime Homes standards ensure that two-storey properties have a standard wheelchair-accessible ground-floor and that the stairs are straight to potentially accommodate a stair lift without a need for a bespoke track. Bungalows built under these standards have a wider turning circle in the hall areas. Ensuring an appropriate mix of properties to meet the needs of the population is a critical element of ensuring that the Council meets the requirements of the Health and Well-being Act.

(To note: the green highlighted figure of 11,518 corrects the LHMA 2023, which records 11,158 in error)

Paragraph 6.14 of the LHMA 2023 advises that 'There is also a requirement for wheelchair user dwellings. Using the same data sources but focusing specifically on those that require fully wheelchair accessible housing within the letting figures, it is possible to follow the same method to produce equivalent results that identify the future requirement for a wheelchair accessible home in Pembrokeshire in 2036.' Subsequent paragraph 6.15 elaborates on this, saying 'In total 2,562 wheelchair user dwellings are required in 2036 in Pembrokeshire, of which 1,630 should be in the market sector and 931 in affordable accommodation. Of the 2,562 wheelchair user dwellings required, 1,974 should be in the general housing stock and 588 in supported accommodation. The

Regional Housing Market Assessment for South West and Mid Wales report estimates that there are currently around 1,440 wheelchair accessible homes in the market sector with 710 in the affordable sector. This implies that the net requirement between 2020 and 2036 is for 190 new wheelchair homes in Pembrokeshire in market accommodation and 221 in affordable housing.’ Paragraph 6.16 adds that ‘by the end of the plan period, around about 4.1% of the total stock should be available to meet this criterion.’

7. Page 130 of LDP 2, Deposit Plan 2 – Policy GN 16 – Residential Allocations – paragraph 5.102 (reasoned justification to policy GN 16) - the reference to the LHMA here remains fit for purpose and no further change is needed.
8. Page 142 of LDP 2, Deposit Plan 2 – Policy GN 20 – Local Needs Affordable Housing – paragraph 5.116 (reasoned justification to policy GN 20) - the reference to the LHMA here remains fit for purpose and no further change is needed.
9. Page 146 of LDP 2, Deposit Plan 2 – Policy GN 21 – Exception Sites for Local Needs Affordable Housing – paragraph 5.121 (reasoned justification to policy GN 21) - the reference to the LHMA here remains fit for purpose and no further change is needed.
10. Page 147 of LDP 2, Deposit Plan 2 – Policy GN 22 – Specialist and Supported Accommodation – paragraph 5.124 (reasoned justification to policy GN 22) - this refers to the LHMA 2022 and therefore needs to be changed to refer to LHMA 2023. Footnote 27 also needs to be changed to refer to Pembrokeshire’s LHMA, 2023 (not 2022).
11. Pages 246 and 247 of LDP 2, Deposit Plan 2 – Appendix 4 Monitoring Framework – the further references to the LHMA on these pages (two times on page 246 and once on page 247) remain fit for purpose.

To conclude on this part of the response, various Matters Arising Changes are required to ensure that LDP 2 is consistent with LHMA 2023, but the Council considers that in each case these are minor modifications / updates that do not undermine the previous policy direction of the Plan.

Moving on to the detail of the Inspectors’ question, the Pembrokeshire LHMA 2023 refers to PCC’s Housing Strategy (which was uploaded to the PCC website in May 2025 but is based on draft version of the LHMA 2023, not the final version). To elaborate on that matter, paragraph 1.12 of the LHMA 2023 says that ‘*there are a number of local policies which will be informed or advanced by the outputs of this LHMA report*’, one of the listed items being PCC’s Housing Strategy and another being the Social Housing Grant Programme Delivery Plan (these are extracts from a longer list). Paragraph 2.30 of the LHMA 2023 refers to a draft version of the Housing Strategy and focuses on the situation regarding second homes, empty properties and holiday lets in Pembrokeshire (as a whole). In summary this says:

1. *In 2022/23 Council Tax records identified 60,602 chargeable dwellings and 1,729 exempt dwellings in Pembrokeshire. Out of this total of 62,331 dwellings, 6.8% (4,216) were classified as chargeable second homes, which is significantly higher than the national figure (1.8%).*
2. *The challenge of long-term empty properties is inextricably linked to that of second homes in Pembrokeshire in that the properties are currently unavailable for use as primary homes to meet local housing needs.*
3. *Additional challenges can exist in relation to the impact of empty properties where lack of maintenance or dilapidation impacts negatively on the surrounding neighbourhood, most likely in areas of high housing density.*
4. *The issue in Pembrokeshire, is around the scarcity of affordable housing overall and the lost opportunity represented by long term empty properties.*
5. *Policy responses have centred on the application of Council Tax premiums on empty properties and the use of relevant receipts for direct actions relating to empty properties.*
6. *Figures from the Office for National Statistics (ONS) indicate that 8,915 (13.8%) of the 64,400 total dwellings in Pembrokeshire were unoccupied on census day in March 2021.*

7. *More reliable data exists through Council Tax records although the data is subject to different classifications under council tax rules for exemptions. Council Tax records provide lower figures.*
8. *For January 2023, StatsWales estimated that there were 1,406 empty properties chargeable for council tax purposes in Pembrokeshire.*
9. *For the purposes of identifying properties for targeted action it is estimated that there are approximately 750 empty properties in Pembrokeshire.*

Welsh Government's Planning Policy Wales, edition 12, paragraph 4.2.6, (SD80) identifies the latest LHMA as a part of the evidence base for development plans, to be considered alongside the latest Welsh Government local authority level Household Projections for Wales and the Well-being Plan for the Plan area, together with other key evidence. As paragraph 4.2.8 notes, LHMA's allow Local Planning Authorities to 'develop a detailed understanding of the nature and level of market and affordable housing demand and need in their communities'. Paragraph 4.2.28 also refers to the need for affordable housing, including 'any evidence of localised affordability issues such as the impact of second homes and short-term lets'.

The response to the LHMA in LDP 2 remains as set out in the policies of LDP 2, Deposit Plan 2 (SD01.1) (as modified by any related Focussed Changes (SD05.2) and minor edits (SD05.03)), including:

- SP 2 – Housing Requirement
- SP 3 – Affordable Housing Target
- GN 13 – Residential Development
- GN 15 – Housing Mix, Second Homes and Short-term Holiday Lets, Space Standards and requirements for Lifetime Homes Standards
- GN 16 – Residential Allocations
- GN 17 – Residential Commitments
- GN 18, GN 19A and GN 19B – essentially a master-planning policy approach for the three largest residential allocations in the Plan area
- GN 20 – Local Needs Affordable Housing
- GN 21 – Exception Sites for Local Needs Affordable Housing

There are further policies relating to specific types of accommodation provision, for instance specialist and supported accommodation and accommodation for gypsies, travellers and show-people.

As noted above, Pembrokeshire County Council's Housing Strategy for 2024-2029⁴² has been published electronically on the Pembrokeshire County Council website.

This website page was uploaded on 22/05/25, hence this latest iteration of the Housing Strategy has appeared too late for PCC's LDP 2 Cabinet and Council reports (02/06/25 and 17/07/25 respectively) to take it into consideration. This version of the Housing Strategy is based on a draft version of the LHMA 2023, not the final version. However, it is important to note that the primary differences between the draft and final LHMA 2023 documents relate to the detailed figures within the LHMA, rather than to the narrative of the conclusions that were drawn from those figures.

The Housing Strategy 2024-2029 sets out the Strategic Priorities for Pembrokeshire, a Housing Vision and five Housing Strategic Priorities, the latter being:

- Priority 1 – Increase the Supply of Affordable Housing to Meet Local Needs
- Priority 2 – Work to Ensure Homelessness is Prevented, Brief, Rare and Unrepeated
- Priority 3 – Improve the Overall Quality of Housing in Pembrokeshire
- Priority 4 – Supporting People to Live Independently for Long in their Own Homes
- Priority 5 – Reducing Carbon Emissions and Tackling Fuel Poverty

⁴² <https://www.pembrokeshire.gov.uk/housing-strategy>

Many of the priorities listed above are linked to and have strong synergies with the objectives of LDP 2 and the link between them and some of the LDP 2 policies already listed in this response is evident. It is also worth making particular reference to some other LDP 2 policies, such as Policy GN 1 – General Development Policy and GN 2 – Sustainable Design and Placemaking, in the context of priority 3 of the Housing Strategy – improving the overall quality of housing in Pembrokeshire, although it is acknowledged that LDP 2 will focus more on new housing stock than on existing stock.

Finally, brief mention should also be made of Pembrokeshire County Council's Social Housing Grant Programme Delivery Plan (SHG PDP), which is strongly influenced by the latest LHMA and the Housing Strategy 2024-2029 – and will also be closely aligned to PCC's emerging LDP 2.

Inspectors' Question: ...b) How objectives to prevent major accidents and limit the consequences of such accidents for human health and the environment are reflected in the Plan, including the long term need to:

- i. maintain appropriate safety distances between establishments and residential areas, buildings and areas of public use, recreational areas, and, as far as possible, major transport routes**
- ii. protect areas of particular natural sensitivity or interest in the vicinity of establishments, where appropriate through appropriate safety distances or other relevant measures; and**
- iii. in the case of existing establishments, to facilitate and encourage operators to take all necessary measures to prevent major accidents and to limit their consequences for human health and the environment.**

Council Response: The Inspectors are seeking further information on how objectives to prevent major accidents and limit the consequences of such accidents for human health and the environment are reflected in the Plan, including the long term need to:

- i) maintain appropriate safety distances between establishments and residential areas, buildings and areas of public use, recreational areas and, as far as possible, major transport routes;
- ii) protect areas of particular natural sensitivity or interest in the vicinity of establishments, where appropriate through appropriate safety distances or other relevant measures; and
- iii) in the case of existing establishments, to facilitate and encourage operators to take all necessary measures to prevent major accidents and to limit their consequences for human health and the environment.

Given the number of major industrial installations in Pembrokeshire, particularly although not exclusively along (or otherwise in general proximity to) the Milford Haven Waterway, the presence of several towns and various villages in the same general area and the importance of this and other areas of the County in a natural environment and landscape context, there is an acute awareness of this issue. Indeed, the proximity of industry, high quality environment and resident and visitor populations that are in one way or another reliant on those matters could be said to characterise Pembrokeshire. It is the lifeblood of the County but there are inevitably different elements that perhaps do not rest that easily together in a geographical proximity context.

The Council has looked to the Welsh Government Development Plans Manual, edition 3 (2020)⁴³, for advice on how to handle this matter and has taken account of the advice in this document that, when preparing Development Management policies, '*Plans should not duplicate provisions in other legislative regimes, for example environmental health, building regulations and health and safety legislation*' (Page 18 – Table 1 – content of an LDP – entry on Development Management Policies). The primary role of the LDP is to present policies and proposals for the development and future use of land, and that is very much the focus of how the Council has responded to the issue that has been raised. However, it is accepted that, in an employment land context, there are aspects of policy that seek to safeguard the ongoing use of existing strategic employment sites for employment purposes, as well as the wider suite of allocation / designation-based proposals across a range of land uses.

In that context, the way that the Council is intending to address the matters raised is primarily through policy GN 1 – General Development Policy of LDP 2 (document reference **SD01.1** as amended through the Part 1 Focussed Changes – document **SD05.2**), criterion 8 of which refers to development proposals

⁴³ <https://www.gov.wales/development-plans-manual-edition-3-march-2020>

which 'would not cause or result in an unacceptable adverse effect (a harmful impact that cannot be satisfactorily mitigated) to health and safety, including through flood risk or land instability'. Paragraphs 5.9 and 5.10 (reasoned justification to Policy GN 1) elaborate on this matter and 5.10 records that a separate advisory note will be prepared which Hazardous Installations have Safeguarding Zones and how further information relating to these zones can be obtained.

There is something similar already in place to support the current LDP, in the form of an Advisory Note on 'Safeguarding for Planning Purposes', prepared in December 2014. This can be made available to the Inspectors, if required. The scope of this document covers Health and Safety Executive Consultation Zones, Commercial Airfields with Safeguarding Zones, Ministry of Defence Establishments, Pipelines, Navigation Beacons / Radio Masts, Areas Liable to Flooding, Air Quality Management Areas and Safeguarded Transport Schemes.

To support LDP 2, PCC has prepared a Constraints Map, which presents spatial information on various planning constraints whose definition lies outside the remit of LDPs, but which nevertheless provides useful contextual guidance. What is shown is publicly available, but to note that some of the matters referred to in the Inspectors' question are subject to restricted access as well as being prepared and updated outside LDP processes.

The Council would also wish to draw to the Inspectors' attention the provisions of the latest edition (4) of the LDP 2 Delivery Agreement (reference **SD06**). In particular, the 'Specific Consultation Bodies' listed in this scheme include the Health and Safety Executive's Hazardous Installations Division and the Hywel Dda Health Board. The 'Other Consultees' list includes the Health and Safety Executive. Hence, those organisations have been consulted throughout the Plan preparation process and given an opportunity to respond to any matters within the emerging Plan on which they have concerns.

Looking at some of the detailed elements of the Inspectors' question, PCC would additionally comment as follows:

- i) *maintain appropriate safety distances between establishments and residential areas, buildings and areas of public use, recreational areas and, as far as possible, major transport routes*

In assessing LDP 2 Candidate Sites (as set out in **SD08.1** to **SD08.6** inclusive) and more generally in preparing LDP 2, Deposit Plan 2, PCC has taken into consideration a range of planning constraints. The main element that PCC can control through its Planning Service relates to the location of new development proposals. However, part of the Pembrokeshire context is that some of the main urban areas are situated close to major industrial sites. In a transport context, while many of the major industrial sites have water-based access or pipeline / transmission line connectivity, some degree of road access is nonetheless necessary and at times this is challenging, particularly where the road network to reach the sites passes through historic towns.

- ii) *protect areas of particular natural sensitivity or interest in the vicinity of establishments, where appropriate through appropriate safety distances or other relevant measures*

LDP 2 has a suite of policies relating to the natural environment – both from nature conservation and landscape perspectives. There is a lot of environmental information included on the Constraints Map. Environmental constraints have been taken into consideration in selecting sites and settlements boundaries for LDP 2. Some areas of nature conservation and / or landscape importance sit alongside major industrial sites, particularly (although not exclusively) in a Haven Waterway context. Much of what will happen in the future in terms of economic development proposals will relate to existing industrial sites and land proximate to those sites. This makes sense from an operational viewpoint but needs to be handled with sensitivity. Sustainable development would support general proximity of major employment developments to locations where people live, but clearly some hazardous uses will require a degree of separation. PCC will

look to the Health and Safety Executive to advise on this where necessary. Defined H&SE zones have linked consultation requirements.

- iii) *in the case of existing establishments, to facilitate and encourage operators to take all necessary measures to prevent major accidents and to limit their consequences for human health and the environment*

The Council considers that these are primarily operational matters that have synergies with, but sit outside, the remit of LDPs. There is an expectation that all operators of major industrial facilities will seek to prevent major accidents. Well thought through land use planning proposals and decisions can help in that regard, but it is necessary to be realistic about the Pembrokeshire context in terms of what already exists. PCC will not seek to duplicate Health and Safety Legislation through its LDP.

Wellbeing Plan (Closed ✓)

the latest *Output Note to PEDW*

Inspector's question: *We note that the Sustainability Appraisal was informed by the 2018 version of the Council's Well-being Plan whereas the current version is dated 2023 (SD44). We therefore seek a brief paper explaining how the LDP is consistent with current version of the Well-being Plan.*

Council Response: During the early stages of the LDP2 preparation, a sustainability appraisal was carried out and a review was undertaken of the relevant plans, policies and programmes (PPP). At the time of this work, the relevant well-being plan was the Well-being Plan for Pembrokeshire (2018) and this is referenced in Appendix 0c of the Sustainability Appraisal and Strategic Environmental Assessment Report – Re-Deposit Plan, as submitted under **SD02.1**.

It is noted that the sustainability document is “a working document and will be updated periodically”. It also states: “A summary of the key objectives and issues arising from the PPP review is presented for each of the proposed SEA topic areas and are ordered by international, EU, national, regional and local relevance. Any new or updated policies, plans or programmes will be added throughout the SA process.” The Sustainability Appraisal and Strategic Environmental Assessment Report – Re-Deposit Plan refers to, the Well-being Plan for Pembrokeshire (2018). The current version of the Well-being Plan for Pembrokeshire is dated 2023, as submitted under **SD44**.

A review of the LDP 2 alongside the current and previous version of the Well-being Plan reflects this transition between Wellbeing Plans (and the long gestation period of LDP 2). This is acknowledged in paragraph 1.20 in the LDP 2: “The following key issues and drivers have been identified for the LDP. These have been influenced by evidence from the Council's Review Report, a review of key documents and engagement with Stakeholders. They are grouped under the headings⁴⁴ identified in the Pembrokeshire Well-Being Plan (2018). These headings are embedded in the replacement LDP's Preferred Strategy and have been carried through to the Deposit Plan 2 document. However, the Pembrokeshire Well-Being Plan is regularly updated and the latest version (2023) includes a revised set of Well-being Objectives, which are as follows:

1. Support growth, jobs and prosperity and enable the transition to a more sustainable and greener economy.
2. Work with our communities to reduce inequalities and improve well-being.
3. Promote and support initiatives to deliver decarbonisation, manage climate adaptation and tackle the nature emergency.
4. Enable safe, connected, resourceful and diverse communities.”

⁴⁴ (insertion for this Initial Q answer) Living and working; Resourceful communities; Tackling rurality; Protecting our environment

While the Well-Being Plan has been updated the 2023 Well-being Plan⁴⁵ states: *“In undertaking our Well-being Assessment and in developing our second Well-being Plan it has become apparent that many of the issues identified within our first Plan remain. This is not surprising as many are issues, which, by their nature, are long-term problems that will take time to address. Throughout the process of developing this draft Well-being Plan we have made sure that these enduring issues are acknowledged through the action we plan to take.”* LDP 2 paragraph 2.2 also acknowledges the updated Well-being Plan and how it retains compatibility with the Vision and Objectives: *“The Draft Vision has been developed following discussions with County Councillors and Key Stakeholders and through the ongoing SA/SEA process. The Vision reflects key elements of the Pembrokeshire Well-Being Plan (2018, and as revised in 2023) influences from the Wales Spatial Plan (2008 Update) and Future Wales – The National Plan, 2040. The compatibility of the Vision and Objectives have been considered against the Well Being of Future Generations goals and the Pembrokeshire Well-Being Plan priorities.”*

Appendix 9 Wellbeing Plans - Key differences and similarities explained' to this Paper provides a commentary on what has changed between the two Wellbeing Plans. In summary, in terms of continuity between the Well-Being Plans there is a strong commitment to collaboration, prevention, community involvement, and environmental sustainability. In terms of change between Plans there is:

- Greater strategic focus
- Clearer emphasis on poverty and inequality
- Stronger framing around climate and nature emergency

In terms of development the Wellbeing Plan has evolved from testing partnership working to targeting systemic challenges that most affect wellbeing. The areas where there is a direct ability to express the Well-being Plan's priorities as land use planning matters that can be properly reflected in a land use plan are written into the original drafting of the first Deposit LDP 2 and updated in the second Deposit LDP 2 (to reflect emerging national planning policy which itself is reflective of the Well-being of Future Generations (Wales) Act 2015). The Local Development Plan's Sustainability Appraisal has been approached in a similar way but could benefit from an updated reference to the latest Pembrokeshire Well-being Plan if this was considered necessary.

In terms of explicit cross referencing to the previous and current Well-being Plan in in LDP 2 the Plan, as well as the structure of LDP 2 the LDP2, relies on the 2018 Well-being Plan as set out below.

Issues: Starting at paragraph 1.20 LDP 2 issues are grouped under the headings (of the four priorities from the 2018 Well-being Plan) to provide consistency in presentation with the 2018 Plan.

Strategic & General Policies: Each strategic policy in LDP 2 is cross referenced to the four priorities taken from the 2018 Wellbeing Plan (see supporting information in each policy wording box) and the general policies of the Plan are also grouped under these priorities. The strategic policies of the Plan are also cross-referenced to the Wellbeing Goals they support.

The LDP2 has also been assessed against the Well-being of Future Generations Act 2015 to ensure it delivers the goals and ways of working set out in this legislation. Both the 2018 and 2023 versions of the Pembrokeshire Well-Being Plan are also guided by the same Well-being of Future Generations Act 2015, meaning all three documents (LDP2; Pembrokeshire Well-being Plan 2018; Pembrokeshire Well-being Plan 2023) are consistent with the Act's overarching themes (see paragraph 2.2 and linked reports in the footnote of the Local Development Plan 2 Deposit 2).

⁴⁵ Well-being Plan for Pembrokeshire, Final May 2023; page 13. Submission ref. SD44

Task 9. Matters Arising Changes (Closed√)

Output: see separate pdf documents

*Matters Arising Changes Schedule
LDP 2 Text FC & Matters Arising Changes*

Introduction to MACs Part 1 to 4 March 26.pdf
ED15a
MACs Part 1 Policy March 26.pdf (Closed √√)
ED15b
MACs Part 2 Minor Edits March 26.pdf (Closed
√√)
ED15c
MACs Part 3 Maps March 26.pdf (Closed √√)
ED15d
MACs Part 4 Other Edits March 26.pdf (Closed
√√)
ED15e
LDP 2 Text FC & MACs track changes March
26.pdf (Closed √√)
ED15f

9. Matters Arising Changes *Output: Schedule,
Maps, SA/HRA implications*

Appendix 1 Brownfield Candidate Sites Categories (non-allocation)

SiteRef	SiteNearestSettlement	CurrentUse	ProposedUse	LDPAllocationType	TtlAreaHa	Deposit V2 OutcomeCategory
211	Houghton	Former haulage yard / Yr iard cludo flaenorol	Housing / Tai	Residential	0.07	Amber 4
091	Maenchlochog	Storage / Storio	Housing / Tai	Residential	0.35	Amber 4
334	Milford Haven / Aberdaugleddau	Vacant previously developed port land / Tir porthladd wag wediâ€™l ddatblyguâ€™n gynt	Mixed Use - Housing, Employment, Retail, Boat Yard, Leisure / Defnydd Cymysg - Tai, cyflogaeth, manwerthu, iard cwch a hamdden	Mixed Use (including Residential)	2.74	Pink 1
281	Pembroke / Penfro	Former school / Gwag ysgol	Mixed Use - Housing, Employment and Retail / Defnydd Cymysg - Tai, cyflogaeth a manwerthu	Mixed Use (including Residential)	0.22	Pink 1
208	Martletwy	Former entertainment complex and residential / Safle adloniant a phreswyl	Mixed Use - Housing, Food and Drink / Defnydd Cymysg - Tai a bwyd a diod	Mixed Use (including Residential)	1.21	Pink 1
207	Martletwy	Former entertainment complex and residential / Safle adloniant a phreswyl	Mixed Use - Housing, Food and Drink, Care Home / Defnydd Cymysg - Tai, bwyd a diod a chartref gofal	Mixed Use (including Residential)	1.21	Pink 1
174	Pembroke / Penfro	Garden / Gardd	Specialist and Supported Residential Accommodation / Llety Preswyl Arbenigol a Llety a Chymorth	Residential	0.95	Pink 1
359	N/A	Road / Ffordd	Re-aligned Road / Ffordd adlinio	Safeguarding	0.36	Pink 1
358	N/A	Road / Ffordd	Re-aligned Road / Ffordd adlinio	Safeguarding	0.31	Pink 1
357	Pen-y-bryn	Road / Ffordd	Re-aligned Road / Ffordd adlinio	Safeguarding	0.12	Pink 1
148	Pembroke / Penfro	Former inert landfill site / Safle tirlenwi anadweithiol blaenorol	Gypsy Site / Safleoedd Sipsiwn-Teithwyr	Traveller Site	4.69	Pink 1
286	Carew & Sageston / Caeriw ac Sageston	Agriculture and Employment / Amaethyddiaeth ac Cyflogaeth	Employment - B2 and Sui Generis to allow for waste recycling / Cyflogaeth â€“ B2 a Sui Generis, i ganiatau ailgylchu gwastraff	Waste	11.85	Pink 1

SiteRef	SiteNearestSettlement	CurrentUse	ProposedUse	LDPAllocationType	TtlAreaHa	Deposit V2 OutcomeCategory
463	N/A	Part former tramway, part Public Right of Way (PRoW) / Rhan cyn-Tramfa, Rhan Hawl Tramwy	Shared use path / Llwybr defnydd a rennir		0.78	Pink 1
462	N/A	Former railway line / Hen Llinell Rheilffordd	Shared use path / Llwybr defnydd a rennir		3.8	Pink 1
461	Letterston / Treletert	Roadside Verge / Ymyl y ffordd	Shared use path / Llwybr defnydd a rennir		1.31	Pink 1
460	Letterston / Treletert	Roadside Verge / Ymyl y ffordd	Shared use path / Llwybr defnydd a rennir		0.33	Pink 1
458	N/A	Former railway line / Hen Llinell Rheilffordd	Shared use path / Llwybr defnydd a rennir		11.07	Pink 1
360	N/A	Road / Ffordd	Re-aligned Road / Ffordd adlinio		0.39	Pink 1
521	St Dogmaels / Llandudoch	Boat park / Parc cwch	Not stated / Heb ei nodi		0.21	Pink 1
016	Barnlake	Vacant / Gwag	Housing / Tai	Residential	0.72	Red 1
495	Hundleton	Residential & General Commercial / Preswyl a Masnachol Gyffredinol	Housing / Tai	Residential	0.75	Red 3
336	Crymych	Former plant storage area / Hen ardal Storfa plant	Housing / Tai	Residential	0.49	Red 3
320	Martletwy	Former entertainment complex and residential / Safle adloniant a phreswyl	Housing / Tai	Residential	1.21	Red 3
315	Brawdy	Brownfield Site not in use / Safle tir llwyd dim mewn defnydd	Housing / Tai	Residential	0.9	Red 3
209	St Dogmaels / Llandudoch	Associated with factory (employment use) / Cysylltiedig a ffatri (defnydd cyflogaeth)	Housing for factory workers / Tai i weithwyr ffatri	Residential	0.2	Red 3
206	Martletwy	Former entertainment complex and residential / Safle adloniant a phreswyl	Housing / Tai	Residential	1.21	Red 3
436	Hook	Storage / Storio	Housing / Tai	Residential	0.27	Red 4
397	Pleasant Valley	Vacant / Gwag	Housing / Tai	Residential	0.18	Red 4

SiteRef	SiteNearestSettlement	CurrentUse	ProposedUse	LDPAllocationType	TtlAreaHa	Deposit V2 OutcomeCategory
346	Tegryn	Domestic garage / Garej cartref	Domestic garage / Garej cartref	Residential	0.01	Red 4
277	Templeton / Tredeml	Former agricultural barn and yard with woodland / Yr ysgubor amaethyddol aâ€™r iard flaenorol gyda choetir	Housing / Tai	Residential	0.68	Red 4
181	Penally / Penalun	Vacant / Gwag	Housing / Tai	Residential	1	Red 4
176	East Williamston	Garden / Gardd	Housing / Tai	Residential	0.17	Red 4
015	Lamphey / Llandyfai	Former farm yard / Yr iard fferm flaenorol	Housing / Tai	Residential	0.12	Red 4
175	Pembroke / Penfro	Garden / Gardd	Retirement Housing / Llety ymddeol	Residential	0.95	Red 4
044	Haverfordwest / Hwlfordd	Woodland Storage Yard / Iard Storfa Coetir	Housing / Tai	Residential	0.07	Red 4
068	Cosheston	Garden / Gardd	Housing / Tai	Residential	0.46	Red 4
096	Pembroke / Penfro	Rented Dwelling / Anedd Rhent	Housing / Tai	Residential	0.04	Red 4
158	Pleasant Valley	Garden / Gardd	Housing / Tai	Residential	0.14	Red 4
155	Fishguard / Abergwaun	Residential Curtilage / Cwrtil Preswyl	Housing / Tai	Residential	0.69	Red 4
511	Pembroke Dock / Doc Penfro	School / Ysgol	Social Housing Over 65â€™s / Tai Cymdeithasol i bobl dros 65 oed	Supported Accomodation	0.2	Red 4
159	Stepaside	Static Caravan / Carafanau Statig	Housing / Tai	Residential	0.11	Red 5
446	Pembroke Dock / Doc Penfro	Vacant and Open Space / Tir wag a Lle Agored	Leisure / Hamdden	Employment	0.79	Yellow 1
404	Pembroke / Penfro	Former Cottage / Gwag Tai	Tea Room or Ice Cream Parlour or Holiday Accomodation / Ystafell te neu barlwr hufen iÃ¢ neu lety gwyliau	Employment	0.21	Yellow 1
401	Pembroke / Penfro	Disused Quarry / Cwarel Gwag	Mixed Use - Leisure, Recreation, Maritime / Defnydd Cymysg - Hamdden, adloniant a morwrol	Mixed Use	3.97	Yellow 1
399	Stepaside	Vacant / Gwag	Holiday Accomodation / Lety Gwyliau	Tourist Accomodation	0.15	Yellow 1

SiteRef	SiteNearestSettlement	CurrentUse	ProposedUse	LDPAllocationType	TtlAreaHa	Deposit V2 OutcomeCategory
362	Pembroke Dock / Doc Penfro	Vacant / Gwag	Car park extension to serve train station / Estyniad maes parcio i wasanaethu orsaf drenau	Community Facility	0.3	Yellow 2
					57.96	

Appendix 2 Settlements and WwTWs

Table 11 Settlements with their own WwTWs

Settlement / location	LDP 2 Settlement Hierarchy
Abercych	Rural Settlement – Local Village
Ambleston	Rural Settlement – Local Village
Blaenffos	Rural Settlement – Service Village
Boncath	Rural Settlement – Service Village
Burton Ferry	Rural Settlement – Local Village
Camrose	Rural Settlement – Local Village
Carew	Rural Settlement – Service Village
Castlemorris	Rural Settlement – Local Village
Cilgerran	Rural Settlement – Service Centre
Clarbeston Road	Rural Settlement – Service Village
Clunderwen	Rural Settlement – Service Village
Cosheston	Rural Settlement – Service Village
Croesgoch	Rural Settlement – Service Village
Crymych	Rural Settlement – Service Centre
Eglwysrwr	Rural Settlement – Service Village
Fishguard	Urban Settlement
Glogue	Not in Settlement Hierarchy
Hermon	Rural Settlement – Service Village
Hook	Rural Settlement – Service Village
Hundleton	Rural Settlement – Service Village
Keeston	Rural Settlement – Service Village
Lampeter Velfrey	Rural Settlement – Local Village
Lamphey	Rural Settlement – Service Centre
Letterston	Rural Settlement – Service Centre
Llanddewi Velfrey	Rural Settlement – Service Village
Llanfyrnach	Rural Settlement – Local Village
Llangwm	Rural Settlement – Service Centre
Llanychaer	Not in Settlement Hierarchy
Llys-y-Fran	Not in Settlement Hierarchy
Ludchurch	Rural Settlement – Local Village
Maenclochog	Rural Settlement – Service Village
Mathry	Rural Settlement – Service Village
Merlins Bridge	Urban Settlement – linked to Haverfordwest
Milford Haven	Urban Settlement
Narberth	Urban Settlement
Newchapel	Rural Settlement – Local Village
Neyland	Urban Settlement
Panteg	Rural Settlement – Local Village
Pembroke Dock	Urban Settlement

<i>Settlement / location</i>	<i>LDP 2 Settlement Hierarchy</i>
Ponrhydyceirt	Not in the Settlement Hierarchy
Puncheston	Rural Settlement – Service Village
Reynalton	Rural Settlement – Local Village
Rhoscrowther	Not in the Settlement Hierarchy
Rosemarket	Rural Settlement – Service Village
Spittal	Rural Settlement – Service Village
St. Florence	Rural Settlement – Service Village
St. Nicholas	Rural Settlement – Local Village
St. Twynnels	Rural Settlement – Local Village
Tavernspite	Rural Settlement – Service Village
Templeton	Rural Settlement – Service Village
Tiers Cross	Rural Settlement – Service Village
Trecwn (village)	Rural Settlement – Local Village
Treffgarne	Rural Settlement – Local Village
Trefin	Not in Settlement Hierarchy
Uzmaston	Rural Settlement – Local Village
Walton East	Rural Settlement – Local Village
Waterston (village)	Rural Settlement – Local Village
Whitland	Rural Settlement – Service Centre
Wolfscastle	Rural Settlement – Service Village

Table 12 Settlements which are linked to a WwTW in a nearby settlement (with foul flows either pumped to the WwTW or alternatively reaching it by gravity flow)

<i>Settlement / location</i>	<i>LDP 2 Settlement Hierarchy</i>	<i>WwTW taking flows</i>
Barnlake	Rural Settlement – Local Village	Neyland
Begelly	Rural Settlement – Service Village	Langdon (which isn't in a settlement)
Blackbridge (estate)	Urban Settlement – linked to Milford Haven	Milford Haven
Broadmoor	Rural Settlement – Service Village	Tenby (PCNP)
Burton	Rural Settlement – Local Village	Burton Ferry
Crundale	Rural Settlement – Service Village	Merlins Bridge
Cuffern	Rural Settlement – Local Village	Newgale (PCNP)
Deerland	Rural Settlement – Local Village	Hook
East Williamston	Rural Settlement – Local Village	Tenby (PCNP)
Freystrop	Rural Settlement – Service Village	Hook
Goodwick	Urban Settlement	Fishguard
Haverfordwest	Urban Settlement	Merlins Bridge

<i>Settlement / location</i>	<i>LDP 2 Settlement Hierarchy</i>	<i>WwTW taking flows</i>
Hakin	Urban Settlement – linked to Milford Haven	Milford Haven
Hayscastle Cross	Rural Settlement – Local Village	Wolfscastle
Hill Mountain	Rural Settlement – Service Village	Llangwm
Houghton	Rural Settlement – Service Village	Llangwm
Hubberston	Urban Settlement – linked to Milford Haven	Milford Haven
Johnston	Rural Settlement – Service Centre	Hook
Kilgetty	Rural Settlement – Service Centre	Langdon (which isn't in a settlement)
Kingsmoor	Rural Settlement – Service Village – linked to Pentlepoir	Langdon (which isn't in a settlement)
Little Newcastle	Rural Settlement – Local Village	Puncheston
Llandeloy	Rural Settlement – Local Village	Newgale (PCNP)
Llandissilio	Rural Settlement – Service Village	Clunderwen
Llanrhian	Rural Settlement – Local Village	Porthgain (PCNP)
Llanstadwell	Rural Settlement – Service Village	Neyland
Lower Freystrop	Rural Settlement – Local Village	Hook
Llwyncelyn	Rural Settlement – Local Village	Pontrhydyceirt
Maddox Moor	Rural Settlement – Local Village	Hook
Mascle Bridge	Rural Settlement – Local Village	Neyland
Milton	Rural Settlement – Service Village	Carew
Pelcomb Cross	Rural Settlement – Local Village	Keeston
Pembroke	Urban Settlement	Pembroke Dock
Penally	Rural Settlement – Service Village	Tenby (PCNP)
Pentlepoir (part)	Rural Settlement – Service Village	Langdon (which isn't in a settlement)
Pentlepoir (part)	Rural Settlement – Service Village	Tenby (PCNP)
Penybryn	Rural Settlement – Local Village	Cilgerran
Penycwm	Rural Settlement – Local Village	Newgale (PCNP)
Pont-yr-Hafod	Rural Settlement – Local Village	Wolfscastle

<i>Settlement / location</i>	<i>LDP 2 Settlement Hierarchy</i>	<i>WwTW taking flows</i>
Portfield Gate	Rural Settlement – Local Village	Merlins Bridge
Roch	Rural Settlement – Service Village	Newgale (PCNP)
Sageston	Rural Settlement – Service Village	Carew
Sardis (near Hill Mountain)	Rural Settlement – Local Village	Llangwm
Scleddau	Rural Settlement – Service Village	Fishguard
Simpson Cross (part)	Rural Settlement – Service Village	Keeston
Simpson Cross (part)	Rural Settlement – Service Village	Newgale (PCNP)
Slade Cross	Rural Settlement – Local Village	Cosheston
Slade Villas	Rural Settlement – Local Village	Merlins Bridge
Square and Compass	Rural Settlement – Service Village	Trefin
St. Dogmaels	Rural Settlement – Service Centre	Cardigan (Ceredigion)
Steynton	Urban Settlement – linked to Milford Haven	Milford Haven
Summerhill	Rural Settlement – Service Village	Amroth (PCNP)
Tegryn	Rural Settlement – Service Village	Llanfyrnach
Thornton (village)	Rural Settlement – Local Village	Milford Haven
Trefgarn Owen	Rural Settlement – Local Village	Newgale (PCNP)
Withybush	Urban Settlement – linked to Haverfordwest	Merlins Bridge
Wolfsdale	Rural Settlement – Local Village	Camrose

Table 13 Settlements without a WwTW

<i>Settlement / location</i>	<i>LDP 2 Settlement Hierarchy</i>
Bryngwyn / Briscwm	Rural Settlement – Local Village
Bwlchygroes	Rural Settlement – Local Village
Cold Blow	Rural Settlement – Local Village
Cresselly	Rural Settlement – Local Village
Ffos Las (Trecwn)	Rural Settlement – Local Village
Glandwr	Rural Settlement – Local Village
Golden Hill	Rural Settlement – Local Village
Jeffreyston	Rural Settlement – Service Village
Leachpool	Rural Settlement – Local Village

<i>Settlement / location</i>	<i>LDP 2 Settlement Hierarchy</i>
Little Honeyborough	Rural Settlement – Local Village
Llangolman	Rural Settlement – Local Village
Llanteg	Rural Settlement – Local Village (following a Focussed Change)
Llanteglos	Not in Settlement Hierarchy (following a Focussed Change)
Llawhaden	Rural Settlement – Local Village
Maidenwells	Rural Settlement – Local Village
Martletwy	Rural Settlement – Local Village
New Hedges	Rural Settlement – Service Village
New Inn	Rural Settlement – Local Village
Penygroes Villas	Rural Settlement – Local Village
Pleasant Valley	Rural Settlement – Local Village
Postgwyn	Rural Settlement – Local Village
Poyston Cross	Rural Settlement – Local Village
Princes Gate	Rural Settlement – Local Village
Redberth	Rural Settlement – Local Village
Rhoshill	Rural Settlement – Local Village
Robeston Wathen	Rural Settlement – Service Village
Stepaside	Rural Settlement – Local Village
Treffynnon	Rural Settlement – Local Village
Upper Nash	Rural Settlement – Local Village
Wiseman's Bridge	Rural Settlement – Local Village
Wiston	Rural Settlement – Local Village
Woodstock	Rural Settlement – Local Village

Appendix 3 Mitigation Options Summary Aecom DIN Developer Handbook

Mitigation option	Predicted duration
Land use change	The approach has high longevity (assuming land use change is secured in perpetuity through S106 agreements) and certainty if it is possible to secure monitoring to confirm that the new land use is maintained.
Agricultural management measures	Clearly demonstrating the magnitude of any benefit can be difficult, especially for measures that target diffuse sources of nitrogen. Any benefit can also be difficult to directly measure and monitor, as well as involving time lags. External economic, policy, and farm management pressures may also affect long-term delivery, with potential for displacement or leakage if reductions are offset elsewhere.
Treatment wetlands	<p>The removal of nitrogen in wetlands is largely a biogeochemical process, including microbial activity and plant uptake during the growing season.</p> <p>Nutrient removal from constructed wetland can be significant but is dependent on appropriate design. Due to the complexity of characterising flows and loads accurately, post-implementation monitoring is essential. Demonstrating the full nutrient removal potential of a wetland may take more than 1 to 3 years, as performance stabilises over time. In general, they are better suited to more strategic scale implementation but may be suitable options for individual developers in some circumstances.</p>
Other wetlands	While these wetlands can contribute to nutrient retention, their lack of controlled water inflows and uncertainty surrounding nutrient removal processes limits their suitability for formal nutrient neutrality calculations.
Septic tank/PTP upgrades	<p>Developers will be required to demonstrate that the PTP will be subject to legally secured ownership and responsibility, ensuring that operation, maintenance and compliance are defined. This may be secured through planning conditions, legal agreements, or other binding mechanisms as appropriate.</p> <p>To ensure nutrient neutrality is delivered, the upgrades to higher efficiency PTPs must be delivered prior to occupancy of proposed developments.</p>
Water efficiency measures	Manufacturer's product testing data (e.g. on flow control devices) provides a clear idea of DIN reductions that are achievable. For sufficient certainty, the Competent Authority will require evidence that a maintenance and monitoring plan is secured and will remain in place upon sale of any affected property via a legal agreement. Regular data submissions to the LPA may be required to show metered water levels and evidence of appliance checks to demonstrate that the water efficient fittings are performing to the required standard to achieve the stated nutrient reductions.
Field boundary management	Understanding of baseline nutrient load within the receiving environment prior to riparian buffer strip implementation is needed to provide the loading value to which the nutrient removal efficiency percentages can be applied to demonstrate nutrient benefit. This can be achieved by scheme specific monitoring or modelling but can be a significant task to achieve
Enhanced drainage ditch management	Assuming correct design and implementation there is confidence in the DIN mitigation related to this approach. However, there are substantial maintenance and monitoring requirements to ensure that the original design is maintained (e.g. periodic sediment removal may be required).
Willow systems	Willow systems are wetland basins, dominated by willows, for 100% evapotranspiration to air in summer and full storage in winter. Designed to treat and discharge all inflow water through

	<p>evapotranspiration and thus there is no outflow from the system and hence no pathway to the designated site.</p> <p>Assuming correct design and implementation there is confidence in the DIN mitigation related to this approach. However, significant monitoring and maintenance (e.g. regular biomass harvesting) is required.</p>
Engineered logjams	<p>While potentially effective for short-term mitigation, they require careful design and are not suitable as long-term solutions. Substantial monitoring would also be required.</p>

Appendix 4 Key Sites & Viability

	Site Reference and Name	Total Unit (No to be delivered in Plan Period)	Affordable Housing Requirement	Sites with 50% or more Affordable Housing ⁴⁶	Sites Granted Planning Permission	Key Site in LDP2 with a Viability Appraisal	Reason
1.	S/HSG/040/LDP2/6 Slade Lane, Haverfordwest	1010 (330)	83%	✓		N	RSL
2.	HSG/040/LDP2/3 Rear of 76 Pembroke Road, Haverfordwest	51	22.5%			Y	
3.	HSG/086/00222 South West of The Meads, Milford Haven	93	100%	✓		N	RSL
4.	HSG/086/LDP2/1 Land at Myrtle Meadows, Steynton	60	15%			Y	
5.	S/HSG/086/LDP2/3 South of Conway Drive, Steynton	280 (117)	15%			Y	
6.	HSG/095/00144 North of Gibbas Way, Pembroke	86	25%			Y	
7.	HSG/095/LDP2/1 Between St Daniels Hill and Norgans Hill, Pembroke	147	25%			Y	
8.	HSG/095/LDP2/4 East of Golden Hill Road, Pembroke	50	20%			Y	
9.	HSG/096/LDP2/2 West of Stranraer Road, Pembroke Dock	59	15%			Y	
10.	S/HSG/034F/LDP2/1 Maesgwynne, Fishguard	342	10%			Y	
11.	HSG/093/00066 East of Poppy Drive, Neyland	101	100%	✓		N	RSL
12.	HSG/088/LDP2/1 West of Bloomfield Gardens and North of Adams Drive and Highfield Park, Narberth	153 (89)	40%		✓	N	PP
13.	HSG/020/LDP2/1 Land at Tan Ffynnon Fields, Cilgerran	90 (50)	17.5%			Y	
14.	HSG/048/00038 North of Hayston View, Johnston	92 (50)	6%			Y	
15.	HSG/052/00011 South of Cleggar's Park, Lamphey	55	25%		✓	N	PP
16.	HSG/063/00024 North of The Kilns, Llangwm	66	15%		✓	N	PP
17.	HSG/152/LDP2/1 South of Bro'r Dderwen, Clynderwen	62 (31)	25%			Y	
18.	HSG/114/LDP/01 East of Pilgrim's Way, Roch	52	13%		✓	N	PP

⁴⁶ (with Social Housing Grant Available)

Appendix 5 SuDS Options and Land Take suitability for High Density Development (30 to 50 dwellings)

Option	Land take	Land use and availability	Suitable for high density development?	Additional notes	Nutrient mitigation
Water butt/storage		Virtually no land is required for these components to be used.	Yes		
Pervious pavement (Permeable paving)		As car parking and other hard standings are essential elements of developments, there is usually no need for additional land to be made available. It is flexible in being able to be used for small or large areas.	Yes	For permeable surfaces that drain a larger adjacent impermeable area, a common standard for compliance is a ratio where the impermeable area is no more than five times the permeable surface area (e.g., 20% of the area is permeable for the remaining 80% impermeable area). This approach is particularly useful in high-density areas.	Phosphates
Filter trench		The land take is small but requires a strip of land adjacent to roads on which they are used. Filter trenches are not normally appropriate for estate roads and therefore their potential for application is limited in developments. Innovative design to avoid stone scatter by covering the surface has been used elsewhere in the world, but maintenance implications of any solution have to be considered.	No		
Filter strip		The land take is very significant and virtually impossible to apply in a high-density residential area. However, there may be some instances where it can be used.	No		
Swales		The land take is very significant for standard and under-drained swales. Although very desirable for treating road runoff, the demands of site planning for meeting PPG3 housing density requirements may often preclude their use over much of a site. However their importance in addressing both the volumes of runoff for small events and improving water quality from road runoff makes these components very desirable in terms of protecting the receiving environment from the most polluting urban surfaces.	No	For open features like swales and detention basins, general guidance suggests a maximum ratio of 10:1 between impermeable area and the base of the storage feature. Some local authorities might recommend 12-15% of the total land area for open storage features like these.	Phosphates

Option	Land take	Land use and availability	Suitable for high density development?	Additional notes	Nutrient mitigation
Ponds		The land take of ponds is significant. They require large areas of public open space. In addition, they may be required to be some distance from any property for reasons of safety. However, ponds located closer to properties and in view of residents are safer than ponds that are not overlooked.	No	Most Lead Local Flood Authorities (LLFA) have helpful guidance for reference. For example, one LLFA recommends that 12-15% of the total land area be allocated for open storage ⁴⁷ . This level of land allocation means that it can be challenging to provide suitable private garden space as well as roads, footways and other public spaces.	Nitrates Phosphates
Linear ponds		The land take for linear ponds is slightly less than that required for swales and they can be used alongside roadways to treat runoff.			
Wetlands		The land take of wetlands is significant. They need to be located in large areas of public open space.			
Detention basins		The land take of basins is relatively small compared to ponds and wetlands. Because they can be effective in smaller areas, they can be located around a site, although being less attractive than ponds, they are not normally placed in highly visible areas.	Possible		
Soakaways		The land take of soakaways is small. However Approved Document H to the Building Regulations requires soakaways to be located 5m from foundations. High density developments may have some difficulty in complying with this stipulation. It is possible that infiltration trenches, with their reduced depths, could have this distance requirement relaxed. Some of the reasons for this rule include: <ul style="list-style-type: none"> • Certain soils are susceptible to shrinkage through the wetting and drying process • Softening of soils can occur when water is present • There is a loss of fines caused by wash out and consolidation of loose soils by water percolation 	Yes		
Infiltration trenches			Yes		

⁴⁷ <https://greenblue.com/gb/how-much-space-is-required-for-suds/>

Option	Land take	Land use and availability	Suitable for high density development?	Additional notes	Nutrient mitigation
Infiltration basins		The land take of infiltration basins is usually high, depending on the design criteria and the soil porosity. By definition the characteristics of these components is for the provision of large flat areas to achieve disposal of the runoff.	No		
Green roofs		Green roofs require no land take.	Yes		
Bio-retention (rain gardens)		Bio-retention areas are generally limited to relatively flat areas. However, they can be any size to suit the environment. As they are relatively flat depressions, the land take is large relative to the hydraulic benefits provided.	No	Similar to permeable surfaces, unlined bioretention features draining an adjacent impermeable area often require the impermeable area to be no more than five times the size of the bioretention feature.	

Appendix 6 Phosphate Stripping Improvement WwTW

WwTW Name	Settlement	WwTW with allocation/commitment	Issue date of reviewed permit	Start Date Initial Permit Phosphorus Concentration limit	Initial Permit Phosphorus Concentration limit mg/l	Start Date 2nd Permit Phosphorus Concentration limit	2nd Phosphorus Concentration limit (2) mg/l
Cleddau Catchment							
CLARBESTON ROAD	Service Village	Yes	29/04/2024	07/05/2024	5	31/03/2030	1.5
CLUNDERWEN	Service Village	Yes (serves allocations in Clunderwen and Llandissilio)	10/07/2023	10/07/2023	1	31/03/2030	0.25
KEESTON	Service Village	Yes (serves allocations in Keeston and Simpson Cross)	19/01/2024	26/01/2024	5	31/03/2030	1.5
LETTERSTON WEST	Service Centre	Yes	26/03/2024	04/04/2024	5	31/12/2025	2.5
MAENCLOCHOG	Service Village	Yes	02/08/2023	02/08/2023	2	n/a	n/a
SPITTAL	Service Village	Yes	03/06/2024	31/03/2025	0.6mg/l	n/a	n/a
WOLFSCASTLE	Service Village	Yes	23/01/2024	30/01/2024	5	30/03/2030	2.3mg/l
CAMROSE	Cluster Local Village	no	06/12/2023	13/12/2023	5	31/03/2030	4.5
AMBLESTON	Local Village	no	11/06/2024	28/01/2028	5	n/a	n/a
LLANDEWI VELFREY	Service Village	No	11/06/2024	18/06/2024	5	31/03/2032	1
MATHRY	Service Village	No	04/07/2024	28/01/2028	5	31/03/2030	1
PUNCHESTON	Service Village	No	13/12/2023	20/12/2023	5	n/a	n/a

WwTW Name	Settlement	WwTW with allocation/commitment	Issue date of reviewed permit	Start Date Initial Permit Phosphorus Concentration limit	Initial Permit Phosphorus Concentration limit mg/l	Start Date 2nd Permit Phosphorus Concentration limit	2nd Phosphorus Concentration limit (2) mg/l
TREFFGARNE	Local Village	No	26/01/2024	02/02/2025	5	n/a	n/a
Teifi catchment							
BONCATH	Service Village	Yes	15/01/2024	22/01/2024	5		
CILGERRAN	Service Centre	Yes	15/12/2023	22/12/2023	5		
ABERCYCH	Local Village	No	05/12/2023	12/12/2023	5		
NEWCHAPEL	Local Village	No	20/06/2024	27/06/2024	5	31/03/2030	3.2

Appendix 7 Strategic Flood Consequence Assessment compliance with Technical Advice Note 15 (TAN15): Flooding and Coastal Erosion

	TAN15 Requirement for SFCA	2019 SFCA Response (See Submission Webpage - SD43.1 Carmarthenshire and Pembrokeshire stage 1 Strategic Flood Consequence Assessment (SFCA) (September 2019))	2022 SFCA Response (See Submission Webpage – SD43.24 South West Wales Stage 1 Strategic Flood Consequences Assessment, Final Report, November 2022)
1.	Provide information on current and future flood risk, using best available information about climate change and projected changes to the nature of flood risk.	See SD43.1 paragraph 3.1 – Datasets used	See SD43.24 : <ul style="list-style-type: none"> • Section 4.4 – Sources of information used in preparing the SFCA • Table 4-1 Assessment of Climate Change for all sources of flooding (Column 2: Data Source) • Section 4.4 – Sources of information used in preparing the SFCA • Section 6 – Further TAN-15 Guidance • Appendix C1 – Pembrokeshire Flood Risk Review
2.	Consider all sources of flooding, including risks associated with rivers and the sea, coastal erosion, groundwater, ordinary watercourse and surface water flooding.		
3.	Include and consider evidence from a range of sources, including maps and models, The Flood Risk Assessment Wales, Flood Risk Management Plans, Shoreline Management Plans and Area Statements.		
4.	Highlight at an early stage those areas where development will be in conflict with national planning policy and guidance.	Phase 1 of the SFCA included screening of Candidate Sites to categorise them as high, medium, low flood risk. See SD43.1 paragraphs 3.3 and 3.5.	

	TAN15 Requirement for SFCA	2019 SFCA Response (See Submission Webpage - SD43.1 Carmarthenshire and Pembrokeshire stage 1 Strategic Flood Consequence Assessment (SFCA) (September 2019))	2022 SFCA Response (See Submission Webpage – SD43.24 South West Wales Stage 1 Strategic Flood Consequences Assessment, Final Report, November 2022)
		This was followed up in Stage 2 by a more detailed assessment of those Candidate Sites identified as being at risk of flooding. See SD.43.2	
5.	May identify a need to include locally specific approaches in Development Plans – in relation to the Recorded Flood Events information on the Flood Map for Planning, local records of surface water or ordinary watercourse flooding incidents or coastal erosion, or areas where there is an expectation that risks may increase with climate change.	The datasets used included NRW data for surface water flooding. There are 2 Shoreline Management Plans. For the area covered by the South Wales SMP a 2m Buffer was used to identify flood risk which incorporates a 2m rise in sea levels. A single level 7m contour was generated to check resulting flood risk outlines and tested to ensure efficacy. See SD43.1 , Section 3.2	See SD43.24 , <ul style="list-style-type: none"> • Section 6.3.4 – Future flood defence and Table 6 -1 Pipeline of FCERM Projects (Row 4, Ritec Culvert Assessment) • Section 6.4 – Urban centres and land use – resilience of existing communities
6.	Look to safeguard land and interests that may be required in the future to reduce the risks of flooding to existing communities.		See SD43.24 , Section 9.3 – Working with Natural Processes and Natural Flood Management – paragraphs 277 - 280
7.	Explore what adaptive measures may be required in the future to address the challenges of climate change.		See SD43.24 , Section 9 – Flood Risk Mitigation and Flood Resilience
8.	Views of Emergency Planning teams and emergency services	See SD06 Delivery Agreement V.4 – paragraphs 3.13 and 3.28 – reference to Dyfed Powys Police, Mid and West Wales Fire and	

	TAN15 Requirement for SFCA	2019 SFCA Response (See Submission Webpage - SD43.1 Carmarthenshire and Pembrokeshire stage 1 Strategic Flood Consequence Assessment (SFCA) (September 2019))	2022 SFCA Response (See Submission Webpage – SD43.24 South West Wales Stage 1 Strategic Flood Consequences Assessment, Final Report, November 2022)
	should be sought and any strong views on the provision and location of access and egress arrangements communicated to prospective developers.	Rescue Service, Hywel Dda Health Board and Pembrokeshire County Council Internal Consultees – no issues raised.	
9.	Consider opportunities to slow and store water as part of natural flood and water management schemes: <ul style="list-style-type: none"> i. Identify areas where water can be stored or slowed permanently or temporarily; ii. Consider managed coastal realignment and floodplain restoration. 		See SD43.24 , Section 9.3 – Working With Natural Processes and Natural Flood Management

Appendix 8 Allocations rolled forward – evidence of substantial change in circumstances

(To note: this table does not include policy SP 15 – safeguarded existing strategic employment sites, or policy GN 17 – residential commitments)

Policy	Allocation location and reference number	Rolled forward from current LDP?	LDP 2 Candidate Site submitted?	Recent planning application history?	Recent change of ownership?	Major development constraints recently removed?	Site being prepared for development?	Emerging Freeport proposals?	Other
SP 14	Blackbridge, Milford Haven S/EMP/086/LDP/01	Yes	No	Yes – refused DNS application for a biomass facility. Further proposals are at the pre-planning stage.	No	No	No	Yes	Last major site adjoining Haven and offering deep water berthing potential. Continued allocation supported by the Two County Economic Study (henceforth referred to as the TCES) (SD19.1 to SD19.6)
SP 14	Former RNAD Site, Trecwn S/EMP/136/00001	Yes	No	Yes – unimplemented permissions for a peaking plant and for a biomass facility.	No	No	Existing buildings are being maintained.	Candidate for Freeport tax site but not taken forward.	Opportunity site in a part of the County where employment sites are in short supply. Continued allocation supported by the TCES (SD19.1 to SD19.6).
SP 14	Goodwick Parrog S/EMP/034/LDP/02	Yes	No	Yes – there has been a recent permission for change of use to allow for overnight motorhome / campervan stays (CA 29 07 25)	No	No – major constraint is flood risk	Not known	No	This site is proximate to Fishguard Harbour, where employment sites are in short supply – but to note the recent permission is not for a B-class employment use. Continued allocation supported by the TCES (SD19.1 to SD19.6).
SP 14	Withybush Cluster (Trading Estate) S/EMP/040/00004	Yes	No	Yes – a large food park building has been constructed	No	No	Part of the site has now been developed.	No	Forms a part of the Withybush Cluster, partly built out recently and allocation supported by

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				on a part of the site recently.					the TCES (SD19.1 to SD19.6)
SP 14	Withybush Cluster (East of Lodge Estate) S/EMP/040/00005	Yes	No	Limited, but part of the site is used for storage of lorry trailers, and some smaller elements have been developed.	No	No	Limited site preparation, mainly in conjunction with use for lorry trailer parking.		Forms a part of the Withybush Cluster, with the allocation supported by the TCES (SD19.1 to SD19.6)
SP 14	Withybush Cluster (West Estate) S/EMP/040/00001	Yes – allocation extended for LDP 2	No	Yes – various applications have been received and permitted on parts of this site. The site is partly built out.	No	No	Site infrastructure in place, including road layout.	No	Forms a part of the Withybush Cluster, site partly developed, with the allocation supported by the TCES (SD19.1 to SD19.6)
SP 14	Thornton Industrial Estate (Hayguard Hay) S/EMP/086/LDP2/01	No							
SP 14	Pembrokeshire Science and Technology Park S/EMP/096/00001	Yes	Yes – CS 280 and CS 377	Yes – various applications have been received and granted planning permission on parts of this site. The site is partly built out.	No	No	Site infrastructure in place, including road layout.	Yes	This site provides a major employment development opportunity in Pembroke Dock and is being taken forward as a Freeport tax site. Site partly developed (including the Bridge Innovation Centre), with the allocation supported by the TCES (SD19.1 to SD19.6)
GN 5	East of Hazelbank, Llanstadwell	No							

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	SPV/066/LDP2/01								
GN 5	West of Ford Farm, Wolfscastle SPV/149/LDP2/01	No							
GN 7	Cawdor Barracks, including the former Brawdy Airfield No reference number	No							
GN 9	Parc Gwynfryn, Crymych EMP/030/00001	Yes (allocation extended for LDP 2)	No	Yes – various applications have been received and permitted on parts of this site. The site is partly built out.	No	No	Site infrastructure in place, including road layout.	No	This site provides a useful addition to the portfolio of local employment sites in north Pembrokeshire.
GN 9	Celtic Link Business Park, near Sceddau EMP/034/00006	Yes	No	Yes, various applications have been received and permitted on this site. The site is partly built out.	No	No	Some parts of the site are built out, but others remain to be developed.	No	This site provides a useful addition to the portfolio of local employment sites in north Pembrokeshire.
GN 9	Withybush Showground, Haverfordwest EMP/040/LDP2/01	No							
GN 9	Old Station Yard, Letterston EMP/053/00001	Yes	No	Yes, various applications have been received and permitted on this site. The site is partly built out.	No	Yes – future DCWW (water company) investment proposed at the	Some parts of the site are built out, but others remain to be developed.	No	This site provides a useful addition to the portfolio of local employment sites in north Pembrokeshire. It is a brownfield site.

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						Wastewater Treatment Works.			
GN 9	Rushacre Enterprise Park extension, Narberth EMP/088/LDP/01	Yes	No	Yes, the new Post Office Depot has planning permission and is built. Other parts of the site remain to be built out.	No	No	Road layout and services are in place, but some extensions to services may be needed.	No	This site provides a useful addition to the portfolio of local employment sites in south-east Pembrokeshire. It provides an opportunity to extend an existing site.
GN 9	Land at Princes Gate Spring Water EMP/000/LDP2/01	No							
GN 9	South of Parc Gwynfryn, Crymych EMP/030/LDP2/01	No							
GN 9	South of KP Thomas and Sons, near Templeton EMP/132/LDP2/01	No							
GN 9	North of Honeyborough Industrial Estate, Neyland EMP/093/00001	Yes, but much reduced in extent	No	Yes, several recent applications, with the site now partially built out.	No	No	Yes, the (reduced) site has been prepared for development, some elements of which are now completed.	No	This site provides a useful addition to the portfolio of local employment sites related to the Haven Waterway. It provides an opportunity to extend an existing site.
GN 10	Old Hakin Road, Haverfordwest MXU/040/01	Yes	Yes – CS 501	Yes, the site has previously had permission for mixed-use	No	No	Development has not commenced.	No	This site already has planning permission for mixed-use employment / residential development.

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				employment and residential development, and the permission has been periodically renewed.					
GN 10	South Quay, Pembroke MXU/095/LDP2/01	No							
GN 16	Former Community Education Centre, Dew Street, Haverfordwest HSG/040/LDP2/1	No							
GN 16	Slade Lane, Haverfordwest S/HSG/040/LDP2/6	Yes	No	Yes, the site has previously been granted planning permission for major housing development. A part of the site has also been granted planning permission for a retail food store, although this is not being taken forward. Further land is required for a new primary school, linked to the housing development proposal. Phase 1 of the site is now	Yes – most of the site is now owned by Pobl Housing Association and Welsh Government (there is also a smaller element owned by Hillwest Ltd)	No	Yes – development of phase 1 is underway.	No	The emerging masterplan is well advanced and will provide a basis for a further planning application. An application for Pobl phase 2 is anticipated soon.

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				being built out by Pobl Housing Association. Pobl will also develop phase 2 of the proposals. The remaining phases of the site relate to land now owned by the Welsh Government. A masterplan is being prepared for the whole site and will provide a basis for a further planning application, likely to be submitted in 2026.					
GN 16	Rear of 76, Pembroke Road, Merlins Bridge, Haverfordwest HSG/040/LDP2/3	No							
GN 16	South West of The Meads, Milford Haven HSG/086/00222	Yes	No	Yes – planning permission for residential development was granted in 2013, there was an application to vary and remove conditions approved in 2018,	No	No	No	No	Although there is no Candidate Site for this proposal, the landowners have submitted various planning applications, that for reserved matters from 2025 currently awaiting a decision.

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				then the time limit on the 2018 permission was extended in 2021, a further variation of condition application was approved in 2025 and a reserved matters application submitted in 2025 currently (January 2026) awaits a decision.					
GN 16	Land at Myrtle Meadows, Steynton HSG/086/LDP2/1	No							
GN 16	East of Castle Pill Road, Steynton HSG/086/LDP2/2	No							
GN 16	Former Hakin Infants' School HSG/086/LDP2/4	No							
GN 16	Former Hubberston VC School, Hakin HSG/086/LDP2/5	No							
GN 16	Former Hakin Junior School HSG/086/LDP2/6	No							
GN 16	North East of Beaconing, Steynton HSG/086/LDP2/7	Yes	Yes – CS 474	No – the site was included as a part of a 2003 residential planning	No	No	This site could form an extension to the adjacent site with	No	This site would form an obvious extension to the adjacent site currently being built out by a

Policy	Allocation location and reference number	Rolled forward from current LDP?	LDP 2 Candidate Site submitted?	Recent planning application history?	Recent change of ownership?	Major development constraints recently removed?	Site being prepared for development?	Emerging Freeport proposals?	Other
				application (which was finally disposed of in 2009) but has not formed a part of the many applications that have followed on other parts of the bigger site.			planning permission currently being built out.		different landowner / developer.
GN 16	South of Conway Drive, Castle Pill Road, Steynton S/HSG/086/LDP2/3	No							
GN 16	North of Gibbas Way, Pembroke HSG/095/00144	Yes	Yes – CS 014	Yes – planning application 24/0906/PA sought permission for a 50-dwelling development. However, it was refused in November 2025, as there was no section 106 planning obligation to secure affordable housing, public open space and financial contributions towards education and active travel – and also because	No	No	No	No	The site is surrounded on three sides by existing development, and there is infrastructure provision to the site boundary. However, the refusal of planning permission in 2025 is a setback, albeit one that could potentially be overcome.

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				there was no screening or appropriate assessment as needed to comply with the Habitats Regulations 2017.					
GN 16	Between St. Daniel's Hill and Norgans Hill, Pembroke HSG/095/LDP2/1	No							
GN 16	South West of Southlands, St. Daniel's Hill, Pembroke HSG/095/LDP2/2	No							
GN 16	East of Golden Hill Road, Pembroke HSG/095/LDP2/4	No – but much of the site is within the Pembroke Settlement Boundary of the current LDP	Yes – CS 167, which is a much larger proposal than the LDP 2 residential allocation	Yes – for the part of the site in the Settlement Boundary of the current plan – outline planning permission for residential development was granted in 2011 and the date for submission of reserved matters was extended in 2015 and again in 2019.	No	No	No	No	Much of CS 167 was rejected due to highway constraints and to the larger site not being well-related to the settlement. The residual of the CS which is allocated for residential development represents what PCC considers to be acceptable from a future development perspective.
GN 16	South East of Southlands, St.	No							

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	Daniel's Hill, Pembroke HSG/095/LDP2/5								
GN 16	North of Pembroke Road, Pembroke Dock HSG/096/00238	In part – the LDP 2 proposal is for a reduced residential allocation on the flatter southern part of the site	No	No	No	Yes – by removing the steeply sloping northern part of the site from the residential allocation.	No	No	The northernmost part of this Council-owned site is steeply sloping. It is considered that the delivery prospect will be improved by reducing the extent of the allocation to the flatter southern sector of the site, and this is reflected by the LDP 2 residential allocation. The detail of the northern boundary was slightly modified by a Focussed Change.
GN 16	Land at Hampshire Drive, Pembroke Dock HSG/096/LDP2/1	No – but within the Pembroke Dock Settlement Boundary of the current LDP	Yes – CS 013	There have been recent planning applications and further development activity on the adjacent site (096/00230), which is in the same ownership	No	No	No	No	This site is surrounded by either existing development or land with planning permission for residential development.
GN 16	West of Stranraer Road, Pembroke Dock HSG/096/LDP2/2	No							
GN 16	Land south of Sycamore Woods and west of Lavinia	No							

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	Drive, Pembroke Dock HSG/096/LDP2/3								
GN 16	Maesgwynne, Fishguard S/HSG/034F/LDP2/1	Yes – in modified form	Yes – CS 335	Yes – various applications submitted, including one for the whole site (excepting Parc Loktudi) in 2014 and one for a 50-dwelling affordable housing proposal more recently. Parc Loktudi (the initial phase) is now largely built out, and the affordable housing proposal for 50 dwellings adjoining Clos-y-Bigney has also recently been completed.	No, but to note that a housing association has been taking forward the proposals for the parts of the site remaining to be developed.	No – highway access is a constraint, and a new roundabout from the A40 trunk road is required by the permission linked to the 2014 planning application. Further discussions with the Trunk Road Authority may look at whether an alternative is possible instead of a roundabout.	Parts of the site are already developed, but the undeveloped residual isn't currently serviced.	No	
GN 16	East of Poppy Drive, Neyland HSG/093/00066	Yes	Yes – CS 385	No	No	No	No	No	
GN 16	West of Bloomfield Gardens and North of Adams Drive	Yes, but noting that the allocation is	Yes – CS 033 but noting that the	Yes – following a residential planning permission	Housing Association now involved	No, but it has been clarified that the discharge of	No	No	

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	and Highfield Park, Narberth HSG/088/LDP2/1	extended for LDP 2	boundary of the CS is slightly different to the allocation.	granted in 2010, there was a time extension for submission of reserved matters given planning permission in 2016 and then a completely new planning application, also for residential development, given planning permission in 2025 (submitted by a housing association). Since then, four discharge of condition applications have been submitted, all of which await determination (January 2026).		treated effluent from the development is to the Pembrokeshire Marine SAC. However, the storm overflow is into the Eastern Cleddau riverine SAC.			
GN 16	Land at Tan Ffynnon Fields, Cilgerran HSG/020/LDP2/1	No							
GN 16	East of Waunaeron, Crymych HSG/030/LDP/01	Yes	Yes – CS 224	No	No	No	No	No	Access into the site available from the adjacent housing estate

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GN 16	North of Hayston View, Johnston HSG/048/00038	Yes	Yes – CS 102	No	No	Yes – the residential allocation of the current LDP was stalled due to a problem with foul water disposal, which has been resolved since the upgrade of the Hook WwTW and of a key pumping station in Johnston	There is a reserved access point (from the A477, through a small estate of modern buildings) but nothing further	No	Retained in the plan as the WwTW constraint is now resolved
GN 16	Maes yr Ysgol, Johnston HSG/048/LDP2/1	No							
GN 16	South of Rock Park, Kilgetty HSG/050/LDP2/1	No							
GN 16	South of Cleggars Park, Lamphey HSG/052/00011	Yes	Yes – CS 200	Yes – planning application submitted in October 2023 for residential development – currently	Housing association now involved (and submitted the 2023 planning application)	No	No	No	

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				undetermined (January 2026)					
GN 16	Adjacent to Lamphey School, Lamphey HSG/052/LDP2/1	No							
GN 16	Between Longstone Court and 62, St. Davids Road, Letterston HSG/053/LDP2/1	No							
GN 16	North of The Kilns, Llangwm HSG/063/00024	Yes	Yes – CS 488	Yes – consent for residential development granted in 2022 and for a 67-dwelling proposal in 2025. There have also been numerous applications for discharge of conditions and non-material amendments recently, some of which are approved, while others await a decision.	A housing association is now involved.	No	No	No	Implementation delayed by issues related to river-water quality.
GN 16	Awel y Mor extension, St. Dogmaels HSG/122/00035	Partly – the allocation of the current LDP has an overlap with	No	There was a 20-dwelling proposal granted planning permission on a part of the site in	No	No	No	No	

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		that in LDP 2, but the allocated areas in each plan are significantly different		2008. A further planning application covering this part of the site and adjacent land was withdrawn in 2025. The LDP 2 proposals include a residential allocation and adjacent amenity open space.					
GN 16	North of Begelly Farm, Begelly HSG/003/LDP2/01	No							
GN 16	Adjacent to Hafod, Blaenffos HSG/006/00003	Yes	Yes – CS 333	No	No	No	No	No	
GN 16	Land at Dungleddy Court, Clarbeston Road HSG/022/LDP2/1	No							
GN 16	South of Bro'r Dderwen, Clunderwen HSG/152/LDP2/1	No							
GN 16	Opposite Woodholm Close, Crundale HSG/029/00014	It is linked to an allocation in the current LDP, but sets the development proposal further back into the site	No, but the LDP 2 allocation links to CS 267 and CS 343	Nothing very recent, but there are some older residential planning permissions relating to the site.	No	Partly – the restriction on the number of dwellings that might be served has been somewhat	The farm buildings at Rhoswell Farm have been demolished.	No	

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						relaxed by the highway authority recently. However, the major site constraint, a raw water main with an associated access and protection zone, remains.			
GN 16	West of Ashford Park, Crundale HSG/029/LDP2/1	No							
GN 16	Adjacent to Brackenhurst, Hill Mountain HSG/043/LDP2/1	No							
GN 16	Land at West End Cottages, Hundleton HSG/046/LDP2/1	No							
GN 16	South of The Crown, Jeffreyton HSG/047/LDP2/1	No							
GN 16	East of Brookfield Close and West of Bridge Lane, Keeston HSG/049/LDP2/1	No							

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GN 16	Adjacent to Maesybryn, Llandissilio HSG/060/LDP2/1	No							
GN 16	East of Hazelbank, Llanstadwell HSG/066/LDP2/1	No							
GN 16	West of Globe Inn, Maenclochog HSG/081/LDP2/1	Partly – the LDP 2 allocation has a reduced extent in comparison with the allocation in the current LDP. Some elements of the allocation of the current LDP now have planning permission and are thus referenced under policy GN 17 (residential commitments)	Yes – CS 201	No	No	No	No	No	
GN 16	Land at Coppins Park, Pentlepoir HSG/099/LDP2/1	No							

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GN 16	South of Robeston Court, Robeston Wathen HSG/113/LDP2/01	Partly – but noting that the LDP 2 residential allocation is significantly reduced in comparison with that in the current LDP	Yes – CS 039 (which is allocated in part)	Yes – an application for 2 dwellings was granted planning permission in 2024	No	No	No	No	
GN 16	East of Pilgrim's Way, Roch HSG/114/LDP/01	Yes	No	Yes – planning permission for residential development was given in late 2024 (it is now a commitment, but the permission was issued too late for this to be recognised by Deposit Plan 2)	No	No	No	No	The landowner has taken forward his development interest under the existing LDP, specifically through the submission of a planning application
GN 16	Between Cornerways and Austalise, Simpson Cross HSG/119/LDP2/1	Yes – proposal extended	Yes – CS 195 and CS 196	Yes – there are recent planning permissions relating to the part of the site allocated by the current LDP. Development is underway on that part of the site.	No	No	Yes	No	The current LDP 1 allocation (also CS 195) now has planning permission (and is being built out) and is thus included in policy GN 17. The site extension (CS 196) is a LDP 2 residential allocation.
GN 16	NW of Wesley Way, Spittal	Yes	No	No	No	A problem at the	No	No	Customer enquiries have indicated that the

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	HSG/120/00018					Wastewater Treatment Works is being removed through a DCWW AMP 7 scheme.			landowner retains a development interest in this land. There were no Candidate Site submissions at all in Spittal village.
GN 16	North of Parsons Green, St. Florence HSG/123/LDP/01	Yes – in slightly modified form	Yes – CS 125 (which has a slightly reduced extent in comparison with the LDP 2 residential allocation)	No	No	No	No	No	The access route into the site forms a part of the LDP 2 residential allocation.
GN 16	West of Kings Park Farm, Templeton HSG/132/LDP2/1	Yes – but only in part, and with the allocation type changed from that for employment of the current Plan to one for residential development in LDP 2	Yes – CS 278, which proposes residential development – but noting that the residential allocation is only of a part of the CS	No – and to note that the historic planning applications on this site were for employment uses	No	No	No	No	
GN 16	North of Bulford Road Bypass, Tiers Cross	No							

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	HSG/135/LDP2/1								
GN 16	Land at Ford Farm, Wolfscastle HSG/149/LDP2/1	Partly – the allocation has been reduced in extent, with part of the allocation of the current LDP now proposed for the provision of a solar PV array	Yes – CS 285, but to note only a part of this received a residential allocation	No	No	Wolfscastle will benefit from DCWW investment to upgrade the WwTW	No	No	The is a solar PV array proposal included in LDP 2 and relating to land adjacent to this residential allocation – the two proposals could potentially be linked
GN 23	SW of Park House, Tenby SSA/089/01	Yes – in modified form	Yes – CS 153	Previously permitted for a specialist and supported housing proposal (initially granted planning permission on appeal). Part of the site is now being proposed for a food store, with no decision at the time of writing. The retail proposal also forms the subject of a LDP 2 representation.	No	No	No	No	
GN 23	East of Park House, Tenby SSA/089/LDP2/01	No							

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GN 23	North of Bulford Road Bypass, Tiers Cross SSA/135/LDP2/01	No							
GN 23	Redstone, Narberth SSA/088/LDP2/01	No							
GN 24	Land west of Kingsmoor Common Gypsy and Traveller site, Begelly GT/003/LDP2/01	No							
GN 24	Land east of Withybush Gypsy and Traveller site GT/040/LDP2/01	No							
GN 24	Adjacent to Monkton Playing Fields, Pembroke GT/095/LDP2/02	No							
GN 30	New Primary School, Slade Lane, Haverfordwest CF/040/01	Yes – but a specific location is no longer identified, as this is subject to ongoing discussion in conjunction with preparation of the site masterplan.	No	Yes, this proposal is linked to the residential allocation on the same site. A masterplan is being prepared for the site, and it is likely that a new planning application, including a revised proposal for a new primary school, will	Yes – most of the Slade Lane site has been sold to Pobl Housing Association and to Welsh Government. WG is leading the master-planning of the site,	No	Some elements of the site infrastructure are already in place. Development of the Pobl phase 1 is underway. Other elements of the site will follow, including the	No	

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				be submitted in 2026.	through Lichfields consultancy.		provision of the new primary school.		
GN 30	New Primary and Secondary Schools, Milford Haven CF/086/LDP2/01	No, but noting this allocation incorporates an element of a residential allocation of the current LDP							
GN 36	Well Hill Improvement, Pembroke TS/LDP2/03	Yes – it is one element of the bigger Southern Strategic Route proposal from the A477 to the major energy / industrial sites on the Haven south shore. Some of the other elements are now completed, but this one remains to be done.	Yes – CS 356 – the proposal is to re-align the road.	No	No	No	No	Not directly, but road access in the Pembroke area has been discussed, and future proposals may emerge.	This proposal is linked to the Eastgate Centre re-use proposals, which are envisaged to be a mixed-use package including employment, residential and retail. The highway scheme is likely to require land take from the Eastgate Centre site. See Appendix 5 of LDP 2, Deposit Plan 2, for further details regarding programming, finance and expected delivery.

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GN 36	Milford Haven Public Transport Interchange TS/LDP2/04	Yes	Yes – CS 361	No	No	No	No	No	See Appendix 5 of LDP 2, Deposit Plan 2 for further details regarding programming, finance and expected delivery.
GN 36	Haverfordwest Public Transport Interchange – Train Station TS/LDP2/05	To an extent	Yes – CS 363	No	No	No	No	No	These two proposals are essentially evolved versions of what was envisaged under the Haverfordwest Sustainable Town Centre Project proposal of the current LDP. While the earlier proposals did not have a defined spatial area, those included in LDP 2 do. See Appendix 5 of LDP 2, Deposit Plan 2 for further details regarding programming, finance and expected delivery. The new bus station / multi-storey car park is currently under construction.
GN 36	Haverfordwest Public Transport Interchange – Bus Station TS/LDP2/08	To an extent	No	Yes – planning permissions are now in place and implementation is underway	No	Yes – the old multi-storey car park has been demolished to facilitate the creation of the new bus station / multi-storey car park.	Yes – development is underway	No	
GN 37	Trefigin Quarry extension MN/000/LDP2/001	No							
GN 59	Milford Haven petro-chemical storage facility (Puma Energy) S/EMP/000/00003	Yes	No	Yes – various applications, including the Eco-Park in the northernmost part of the site and various proposals	No	No	Existing site, but with parts being re-purposed.	Yes	The policy GN 59 sites are those that are considered potentially suitable for the provision of new in-building facilities for the handling and treatment of waste.

Policy	Allocation location and reference number	Rolled forward from current LDP?	LDP 2 Candidate Site submitted?	Recent planning application history?	Recent change of ownership?	Major development constraints recently removed?	Site being prepared for development?	Emerging Freeport proposals?	Other
				relating to hydrogen technology					In each case, these are existing employment sites. There is an existing waste facility on the site (the recently opened Eco Park).
GN 59	Waterston – tank farm and LNG S/EMP/000/00004	Yes	No	Yes – various industrial and renewable energy proposals at and in the vicinity of this site	No	No	Existing site	Yes	The policy GN 59 sites are those that are considered potentially suitable for the provision of new in-building facilities for the handling and treatment of waste. In each case, these are existing employment sites.
GN 59	Waterston Industrial Estate EMP/146/00001	Yes	No	Yes – various industrial and waste-related proposals, plus some proposals for other uses	No	No	Existing site	No	The policy GN 59 sites are those that are considered potentially suitable for the provision of new in-building facilities for the handling and treatment of waste. In each case, these are existing employment sites. There are some existing waste uses on this site.
GN 59	Pembroke Power Station site S/EMP/095/00001	Yes	No	Yes – there have been a variety of proposals at and in the vicinity of the Power Station site, including energy storage and	No	No	Existing site, but with some related proposals coming forward on adjoining land	Yes	The policy GN 59 sites are those that are considered potentially suitable for the provision of new in-building facilities for the handling and treatment of waste.

Policy	Allocation location and reference number	Rolled forward from current LDP?	LDP 2 Candidate Site submitted?	Recent planning application history?	Recent change of ownership?	Major development constraints recently removed?	Site being prepared for development?	Emerging Freeport proposals?	Other
				pipeline / grid related developments			(particularly those relating to energy storage and pipeline connections		In each case, these are existing employment sites.
GN 59	Kingswood Industrial Estate, Pembroke Dock S/EMP/096/00005	Yes	Yes, in part – CS 342 – but noting that this was for a mixed-use retail, food and drink and care facility proposal, not for waste-related activities	Yes – various employment related proposals, plus some for other types of use, including a very recent proposal for a food-store on a part of the site, which has yet to be determined – this has also formed the subject of a LDP 2 representation.	No	No	Existing site with some vacant land within the site boundaries	No	The policy GN 59 sites are those that are considered potentially suitable for the provision of new in-building facilities for the handling and treatment of waste. In each case, these are existing employment sites.
GN 59	Waterloo and London Road Industrial Estate, Pembroke Dock S/EMP/096/00006	Yes	No	Yes – in particular for employment and waste related proposals	No	No	Existing site with some vacant land within the site boundaries	No	The policy GN 59 sites are those that are considered potentially suitable for the provision of new in-building facilities for the handling and treatment of waste. In each case, these are existing employment sites. There are some existing waste uses on this site.
GN 59	Valero Refinery, Rhoscrowther	Yes	No	Yes – for employment and	No	No	Existing site	Yes	The policy GN 59 sites are those that are

Policy	Allocation location and reference number	Rolled forward from current LDP?	LDP 2 Candidate Site submitted?	Recent planning application history?	Recent change of ownership?	Major development constraints recently removed?	Site being prepared for development?	Emerging Freeport proposals?	Other
	S/EMP/000/00002			energy-related proposals					considered potentially suitable for the provision of new in-building facilities for the handling and treatment of waste. In each case, these are existing employment sites.
GN 59	Celtic link Business Park, Scleddau EMP/034/00006	Yes	No	Yes – for employment and waste proposals	No	No	Existing site, but only partially built out	No	The policy GN 59 sites are those that are considered potentially suitable for the provision of new in-building facilities for the handling and treatment of waste. In each case, these are existing employment sites. There are some existing waste uses on this site.
GN 59	Trecwn S/EMP/136/00001	Yes	No	Yes – unimplemented permissions for a peaking plant and for a biomass facility.	No	No	Existing site with some retained buildings from earlier uses	Not currently, but previous discussions have taken place in a tax site context	The policy GN 59 sites are those that are considered potentially suitable for the provision of new in-building facilities for the handling and treatment of waste. In each case, these are existing employment sites.
GN 59	Parc Gwynfryn, Crymych EMP/030/00001	Yes, in modified form	No	Yes – for employment and waste-related proposals	No	No	Site layout in place and the site itself is partially built out	No	The policy GN 59 sites are those that are considered potentially suitable for the provision of new in-building

Policy	Allocation location and reference number	Rolled forward from current LDP?	LDP 2 Candidate Site submitted?	Recent planning application history?	Recent change of ownership?	Major development constraints recently removed?	Site being prepared for development?	Emerging Freeport proposals?	Other
									facilities for the handling and treatment of waste. In each case, these are existing employment sites. There are some existing waste uses on this site.

1. From many thematic projects to three strategic priorities


2018 Plan

- Structured around **multiple discrete priorities and projects**
- Covered a wide range of topics separately (employment, engagement, environment, public service reform)
- Strong emphasis on *how* services work (e.g. “doing things differently”)

Current Plan

- Consolidates activity into **three broad, outcome-focused priorities**
- Designed to provide **strategic clarity and focus**
- Emphasises **collective impact rather than individual projects**

What’s changed:

 A shift from a *project-led* plan to a more *strategic, system-wide* approach.

2. Poverty and inequality: a major new emphasis

2018 Plan

- Poverty and inequality were **implicit**, addressed through:
 - Employment transformation
 - Skills, participation and access to services
- Not named explicitly as a headline priority

Current Plan

- **Reducing poverty and inequalities** is a **stand-alone, central priority**
- Reflects:
 - Cost-of-living pressures
 - Evidence from the Well-being Assessment
 - Learning from the COVID-19 period

What’s changed:

 Poverty has moved from an *underlying theme* to a **primary strategic focus**.

3. Communities: from engagement to resilience and capacity


2018 Plan

- Focus on:
 - Community participation
 - Understanding communities
 - Engagement and consultation
- Emphasis on **involving people in decision-making**

Current Plan

- **Strengthening communities** goes further, focusing on:
 - Community resilience and capacity
 - Asset-based working
 - Reducing loneliness and isolation
- Greater emphasis on **community-led action and co-production**

What’s changed:

 The focus has matured from *engagement* to **empowerment and long-term resilience**.

4. Environment and climate: stronger and more urgent


2018 Plan

- Separate priorities and projects for:
 - Climate risk
 - Carbon neutrality
 - Outdoor environment and wellbeing
- Early recognition of climate change impacts

Current Plan

- Combines these into “**Tackling climate change and the nature emergency**”
- Explicitly recognises:
 - Biodiversity loss
 - Climate adaptation as well as mitigation
 - Social justice and a fair transition

What’s changed:

 Broader and more urgent framing, reflecting the **climate and nature emergency** rather than isolated environmental actions.

5. Public service reform: less visible, more embedded


2018 Plan

- Explicit priority: “**Doing things differently**”
- Focus on:
 - Culture change
 - Prevention
 - Collaboration between organisations

Current Plan

- These principles are **embedded across all priorities**
- Less visible as a named priority, but more fully integrated into delivery expectations

What’s changed:

 Public service reform has moved from a *stand-alone theme* to a **core way of working**.

Overall evolution

In summary:

- **Continuity:**
 - Strong commitment to collaboration, prevention, community involvement, and environmental sustainability
- **Change:**
 - Greater strategic focus
 - Clearer emphasis on poverty and inequality
 - Stronger framing around climate and nature emergency
- **Maturity:**
 - The Plan has evolved from *testing partnership working* to **targeting systemic challenges that most affect well-being**