



Spatial Strategy Background Paper

December 2019

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Abbreviations

AMR	Annual Monitoring Report
JUDP	Joint Unitary Development Plan for Pembrokeshire 2000-2016
LDP / LDP (2)	Local Development Plan / Local Development Plan (2)
LPA	Local Planning Authority
SPG	Supplementary Planning Guidance
TAN	Technical Advice Note
LHMA	Local Housing Market Assessment
PCNPA	Pembrokeshire Coast National Park Authority
PCC	Pembrokeshire County Council
WG	Welsh Government

Glossary of Terms

Adopted	The Local Development Plan is adopted when the Authority's Council Meeting decides it will be the Development Plan for the County and replace the existing Development Plan.
Affordable Housing	Residential development for sale or rent below market prices and retained as affordable in perpetuity
Affordable Housing Allocation	Land allocated for affordable housing either low cost home ownership or to rent.
Availability and Deliverability of Land	Available land includes a landowner willing to develop or sell for development. Deliverability relates to the economic viability of bringing a site forward
Countryside	Land outside of settlements identified within the Settlement Hierarchy
Deposit Plan	A full draft of the Plan which is available for public consultation during the Deposit Period.
Housing Allocation	Residential development sites for a minimum of 5 units and shown within the Development Plan
Infrastructure	Infrastructure encompasses power supplies, water supply, means of sewage or surface water disposal, roads and other transportation networks, telecommunications and facilities that are required as a framework for development.
Joint Unitary Development Plan (JUDP)	The previous Development Plan for Pembrokeshire. The Plan that was in place until 2013 when the current Local Development Plan was adopted.
Market Housing	Housing for sale at market prices (can include self-build or custom build housing).
Settlement Hierarchy	Settlements are classified within the hierarchy according to the population and level of services within the settlement.

	Some very small settlements with very limited or no services will fall outside the hierarchy and are defined as countryside.
Windfall	Windfall sites are sites not included as allocations within a Development Plan, but which subsequently become available for housing development. They are sites not formally identified in the development plan. Whilst windfalls are not planned, they are an expected type of development which contribute towards an Authority's overall housing provision.

Introduction

Local Development Plan Review

- i. Pembrokeshire County Council is preparing a replacement Local Development Plan (LDP) – **Local Development Plan 2**. When adopted, it will provide a revised and updated policy framework to guide development outside of the National Park and inform planning decisions taken by the County Council. During the **Review**, the existing Local Development Plan (up to 2021) will remain in place until Local Development Plan 2 (LDP2) is adopted.

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- ii. The Pembrokeshire Preferred Strategy states:

“5.10 A 60%/40% Urban/Rural split of housing allocations (sites over 5 units) is proposed. This is broadly in line with the current population split in Pembrokeshire. The advantages of this approach are that it offers growth opportunities to both urban and rural communities. Although there may be greater take up of greenfield sites than in a more urban focused approach, this distribution split will cause fewer issues associated with congestion and pollution within the urban areas. The use of a Settlement Hierarchy means that larger housing developments (sites of 5 or more) being built in the rural areas will be directed to settlements with a good level of services and facilities.”

- iii. This Background Spatial Strategy has been produced to provide additional clarification of the reasons for which the Authority considers its 60/40 spatial split within the Deposit Plan to be the most appropriate strategy for the Plan.

National Planning Policy

- iv. Planning Policy Wales 10 notes that an essential component for a sustainable place is where development is to be located (paragraph 3.37). It goes on to state that:
“Development plans will provide the basis for this by identifying areas and sites for new development. This will be based not only on the consideration of the needs of existing urban and rural areas but also future relationships between urban settlements and their rural hinterlands, particularly in the light of ensuring strong rural and urban communities, maintaining places which are resilient to the effects of social and economic change and are resilient in the light of the impacts of climate change.”

Requirements for preparing a Local Development Plan

- v. Draft Local Development Manual Edition 3 notes that the spatial strategy underpins all elements of the plan and must demonstrate compliance with the gateway test, search sequence and National Sustainable Placemaking Outcomes in PPW (page 88).
- vi. It goes on to state that: “The LPA must consider and assess a number of realistic options for the spatial distribution of development across their area.

However, for revisions to adopted plans there will already be a large degree of contextual evidence and testing of options which, rather than start from scratch, would benefit from validating to understand if and/or where any new evidence for alternative options is required.”

Extract from Draft LDP Manual Edition 3:

✓	Aspirations of the plan (areas for regeneration, wider regional context etc.)
✓	Availability and suitability of brownfield land in preference to greenfield land and land of high agricultural, ecological or landscape value
✓	Capacity of existing and potential infrastructure
✓	Scale and location of market and affordable housing required
✓	Scale and location of employment opportunities
✓	Environmental implications, energy consumption, greenhouse gas emissions, flood risk
✓	Social and cultural factors, including consideration of the Welsh language
✓	Accessibility to employment opportunities
✓	Accessibility to jobs, shops and services

Format of report

- vii. Section 1 of this report sets out the strategy within the current Local Development Plan and information from the Annual Monitoring Reports and Review reports relating to the delivery of this strategy.
- viii. Section 2 highlights information from the LDP 2 evidence base (the issues and factors affecting the area) in directing the strategy for the revised Plan in accordance with guidance from Draft LDP Manual Edition 3.
- ix. Section 3 highlights how the Deposit Plan’s policies together address the Vision and Objectives of the Plan.
- x. Section 4 identifies how the Deposit Plan strategy addresses the gateway test, search sequence and National Sustainable Placemaking Outcomes in Planning Policy Wales (Edition 10).
- xi. Section 5 Conclusions presents an overview of why the Deposit Plan Strategy is the most appropriate for Pembrokeshire.

Section 1: LDP 1 Strategy and information from Monitoring on Delivery

1. The current adopted Local Development Plan has a strategy which is based on a 60% urban and 40% rural strategy.
2. Evidence from the Authority's Annual Monitoring Reports demonstrates that residential permissions to date have been granted in accordance with the adopted Plan's strategy (see table 1).

3. The Authority's Review Report notes that:

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

4. The 60/40 strategy of LDP 1 has been delivered, however three large strategic sites in the urban area (two in Haverfordwest and one in Fishguard) have not been developed. In order to deliver a 70/30 Urban/Rural split the Authority would need to rely to a greater extent on the delivery of large strategic sites in the Urban settlements. Evidence from current monitoring suggests this would be problematic and potentially not deliverable. It is the small and medium sized sites across the Plan area that have been delivered successfully.
5. As part of the Annual Monitoring Review in 2017 monitoring considered the levels of services within settlements in comparison with those services present at the start of the Plan period. The Rural Facilities survey work which had informed LDP 1 was therefore repeated in spring 2017, and was updated in September 2018 and again in March 2019 (following the Publication of the Preferred Strategy and Stakeholder and City, Town and Community Council workshops), in order to inform the Review of the Local Development Plan. The report concludes that there had not been a significant change in the level of services within settlements between 2010 and 2019, illustrated by a small number of changes in the settlement hierarchy. This demonstrates that the current 60/40 strategy has largely been successful in maintaining the levels of services present in settlements in 2010.
6. In Summary, Monitoring of the current LDP suggests that the 60/40 split is being delivered; that a greater proportion of large sites within the Urban settlements might not be deliverable and that the current strategy has been largely successful in maintaining services within the Plan's rural areas.

Summary of Permissions granted 2014-2019

Strategic Objective: Improving access to goods & services (I)			2013-14	2014-15	2015-16	2016-17	2017-18	2018-2019	
Number & proportion of housing planning permissions at different levels of the settlement hierarchy.	60% of permissions are in the Hub Towns	Permissions less than 50% in Hub Towns over a period of 3 years.(Note: percentages do not equal 100% due to rounding)	Hub Town 1,191 (77%)	Hub Town 790 (65.3%)	Hub Town 356 (39%)	Hub Town 259 (37%)	Hub Town 317 (52%)	Hub Town 149 (69.9%)	Total Urban permissions:3062 (60.3%) Total Rural permissions:2019 (39.7%) (Rural Town 157, Service Centre, 238, Service Village, 1217, Large Local Village,58, Small Local Village 45, Countryside 304)
			Rural Town 55 (3.5%)	Rural Town 31 (2.6%)	Rural Town 43 (5%)	Rural Town 27 (4%)	Rural Town 110 (18%)	Rural Town 1 (0.5%)	
			Service Centre 14 (0.9%)	Service Centre 23 (1.9%)	Service Centre 98 (11%)	Service Centre 69 (10%)	Service Centre 32 (5%)	Service Centre 2 (0.9%)	
			Service Village 165 (11%)	Service Village 303 (25%)	Service Village 329 (36%)	Service Village 279 (41%)	Service Village 117 (19%)	Service Village 24 (11.3%)	
			Large Local Village 12 (0.8%)	Large Local Village 10 (0.8%)	Large Local Village 22 (2%)	Large Local Village 9 (1%)	Large Local Village 4 (1%)	Large Local Village 1 (0.5%)	
			Small Local Village 15 (1%)	Small Local Village 15 (1.2%)	Small Local Village 10 (1%)	Small Local Village 0 (0%)	Small Local Village 1 (0.5%)	Small Local Village 4 (1.9%)	
			Open Countryside 95 (6%)	Open Countryside 38 (3.1%)	Open Countryside 64(7%)	Open Countryside 48 (7%)	Open Countryside 27 (4.5)	Open Countryside 32 (15%)	

Section 2: LDP 2 Evidence Base information on Issues/Factors to be addressed through Spatial Strategy

• Availability and suitability of brownfield land in preference to greenfield land and land of high agricultural, ecological or landscape value
• Capacity of existing and potential infrastructure
• Scale and location of market and affordable housing required
• Scale and location of employment opportunities
• Environmental implications, energy consumption, greenhouse gas emissions, flood risk
• Social and cultural factors, including consideration of the Welsh language
• Accessibility to employment opportunities
• Accessibility to jobs, shops and services

A. Availability and suitability of brownfield land in preference to greenfield land and land of high agricultural, ecological or landscape value

7. Pembrokeshire does not have particularly high numbers of brownfield sites in suitable locations for development— many brownfield sites are former WW2 airfields in remote locations which are not sustainable for future growth. The consideration of brownfield land therefore has not significantly influenced the overall strategy of the Plan, but has influenced consideration of individual Candidate Sites. The Council’s Site Assessment Report details how all Candidate Sites have been considered. In accordance with the Candidate Site methodology, brownfield sites have been identified in preference to greenfield sites where this accords with the Council’s settlement hierarchy and land of a high agricultural, ecological or landscape value has not been allocated (see Site Assessment Report).

B. Capacity of existing and potential infrastructure

8. The Council’s Settlement Hierarchy is based on an assessment of existing infrastructure. This is set out within the Council’s Rural Facilities Survey Report 2019 and Urban Settlements Report 2019. The infrastructure considered includes schools, shops, bus services train services, facilities such as a GP surgery, pharmacy and public house and waste water treatment works.¹ As set out in the Preferred Strategy and Deposit Plan a Settlement Hierarchy is a key element of ensuring that the LDP Strategy directs development to appropriate locations. It is a critical mechanism that ensures that those sites identified within the Rural area are in sustainable settlements.

C. Scale and location of market and affordable housing required

¹ <https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base>

9. The Council has evidence of affordable housing need across the Plan area as demonstrated by the current Local Housing Market Assessment 2014 and the emerging draft Regional Housing Market Assessment. In terms of an Urban/Rural split an extract from the 2014 LHMA which covers the whole of Pembrokeshire (including National Park settlements) is set out below. This Assessment demonstrates that 46% of the need for Social Rented Affordable Housing is in settlements considered rural:

Community Council Area	Affordable Social Rented Need 2014-19						6 Bed
	1 Bed	2 Bed	3 Bed	4 Bed	5 Bed	6 Bed	
Fishguard and Goodwick	55.4	11.6	0	3.6	0.6	0.1	
Haverfordwest	125.5	25	0	7.3	1.1	0.1	
Merlin's Bridge	19.7	4.7	0.3	1.3	0.2	0	
Milford Haven	100.5	25.7	0	6.8	1.4	0.1	
Neyland	40	7.1	0	1.9	0.3	0	
Pembroke	89.7	12.9	0	3.2	1	0.1	
Pembroke Dock	82.2	16.2	0	6	0.9	0.1	
Tenby	68.7	7.8	0	2.1	0.6	0	
Saundersfoot	32	4.6	0	1.4	0.3	0	
	613.7	115.6	0.3	33.6	6.4	0.5	
Totals	1170.6	200.1	4.1	61.2	13.9	0.5	1450.4
Total rural area	556.9	84.5	3.8	27.6	7.5	0	680.3
Percentage rural areas	47.57389	42.22889	92.68293	45.09804	53.95683	0	46.9043

10. As set out in the Authority's Preferred Strategy a 60/40 split offers the potential to support both Urban and Rural communities. Meeting Affordable Housing demand, based on need, is a critical element of why supporting both communities is key.

D. Scale and location of employment opportunities

11. As set out in the Pembrokeshire Economic Profile (PACEC) report and the Two County Economic Study (Arup 2019), the employment rate in Pembrokeshire is similar to Wales as a whole, but there are more self-employed people and fewer full-time employees. Significant employment sectors include Education, Health and Public Administration, which collectively employs the largest absolute number of people in the Larger than Local area, as well as retail which employs 12.1% of the workforce in both local authority areas. Within Pembrokeshire specifically, energy and defence are also key employers.
12. The rural nature of the Larger than Local area is evidenced by the percentage of employment within the crop, animal production and hunting sector (2.3% in Pembrokeshire and 3.7% in Carmarthenshire) when compared to the national

average of 1%. Tourism employs around 3,800 more people than would be expected if Pembrokeshire had a similar mix to Great Britain. In Pembrokeshire, the percentage of employment within the accommodation sector is 7.3% which compares to just 1.4% in Carmarthenshire and 2.1% in Wales. This has continued to grow year on year, increasing by 1.3% in five year period between 2012 and 2017. Similarly, food and beverage service activities assume a higher proportion of employment in Pembrokeshire compared to neighbouring Carmarthenshire (8.5% versus 5.3%). This is perhaps an indication of the growth and strength of the tourism sector in Pembrokeshire.².

13. The Two County Economic Study Appendix B notes that:

“ONS travel to work data (2016) shows that in both Carmarthenshire and Pembrokeshire, residents travel on average 22 minutes from their home to their workplace. The vast majority of these journeys are taken by the private car, interestingly a much higher proportion of the population in both local authority areas walk to work than use public transport (including bus and rail) perhaps suggesting a more localised labour market outside of main settlements. In both Carmarthenshire and Pembrokeshire there is a higher proportion of outflow commuting compared to inflow commuting. In Pembrokeshire the most common destination for both commuting out of the county and in to the county is neighbouring Carmarthenshire, whilst in Carmarthenshire the most popular destination for both inward and outward flows is Swansea.”

14. To summarise, in addition to important sectors in energy, defence and public services, Pembrokeshire’s economy is in part based on more rural employment including agriculture and tourism. Travel to work data highlights Carmarthen as a key area for commuters outside the County but a significant proportion of the population walk to work, potentially reflecting the higher self-employment numbers and rural employment options associated with agriculture and tourism.

15. The Two County Economic Study identifies significant opportunities around the Milford Haven Waterway, as well as linked to increasing expansion of tourism and food enterprises in Pembrokeshire. These mixed opportunities offer both Urban and rural opportunities for future employment.

E. Environmental implications, energy consumption, greenhouse gas emissions, flood risk

16. ULEV charging points have been introduced into the Deposit Plan as a requirement for all new residential development. This will assist in mitigating the environmental impact, recognising that the majority of Pembrokeshire’s residents commute by car.

² www.pembrokeshire.gov.uk/local-development-plan/review/evidencebase Two County Economic Study
ARUP

17. Although as identified in the Sustainability Appraisal the 60/40 strategy may lead to more travel to urban settlements than a 70/30 strategy, there are key ways in which a 60/40 strategy may have lower environmental implications. Firstly a 60/40 strategy is more likely to maintain services within existing settlements in rural areas, thereby ensuring those services continue to support existing populations. Secondly a 60/40 strategy enables growth across a wider range of settlements, making it more likely that sites without significant landscape or biodiversity value can be allocated.
18. Flood risk has been assessed through the Joint Strategic Flood Consequence Assessment (Atkins, 2019). In many of the Urban settlements in Pembrokeshire there are particular areas at flood risk, in part linked to climate change. This is shown on the maps of the SFCA, published to the Council's website. Policy GN 36 Coastal Change shows areas at risk from sea level rise on the Proposals Maps – key areas within the Urban settlements are affected and residential development in these locations will be restricted in the future.

F. Social and cultural factors, including consideration of the Welsh language

19. The Deposit Plan includes a map demonstrating those areas of the County where over 20% of the population are Welsh speakers. No Urban settlements exist in the North East of Pembrokeshire, the part of the Plan area with the greatest level of Welsh speakers.
20. A 60/40 strategy which allows housing growth in areas such as Crymych (a Service Centre in North East Pembrokeshire with a range of services including a Welsh language secondary school) is more likely to support Welsh speaking communities than a 70/30 strategy which would focus most development on the Towns around the Haven waterway. The Deposit Plan includes a Welsh Language policy that enables phasing to take place on large sites to reduce the likelihood of housing sites being released too quickly into a community. Those settlements in an area identified as being sensitive for the Welsh language are identified within the Proposals Maps (see IG/WL code).
21. The Local building industry is a key employer in Pembrokeshire. A 60/40 Urban Rural split enables the Authority to identify a wider range of sites including a greater number of small and medium sized sites. This is a key social consideration as it means that a greater number of sites are available which can be delivered by smaller and potentially local building firms, generating additional employment within the area.

G. Accessibility to employment opportunities

H. Accessibility to jobs, shops and services

22. As set out above, there are significant employment opportunities within both the Urban and Rural areas. The Plan's evidence base has considered services and facilities as well as employment opportunities when identifying a Settlement Hierarchy.

23. In summary, key areas of the evidence base that require consideration in establishing the Strategy support the delivery of a 60/40 Urban Rural split. This Strategy when supported by a Settlement Hierarchy approach and detailed policies on Affordable Housing, Employment and Landscape can address the major issues facing the Plan area.

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Section 3: Vision and Objectives

Vision

LDP Vision

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

24. The Vision is clear that the LDP will seek to tackle challenges of rurality and climate change. As set out above, certain areas within the Urban settlements (Lower Town Fishguard, Pembroke Dock, Milford Haven and Haverfordwest) have specific areas at risk from sea level rise that cannot accommodate additional residential development.
25. The Plan's Vision seeks to provide Homes for all which in accordance with the distribution of need for affordable housing requires at least 40% of provision to be in rural areas. Employment opportunities are identified linked to tourism, rural diversification and opportunities around Milford Haven Waterway and Town Centres. This diversity of employment opportunities lends itself to a strategy supporting both rural and urban areas.
26. As set out in Section 2 a 60/40 urban/rural strategy allows the Authority to consider a greater range of settlements for future growth, meaning the most sensitive areas in terms of wildlife and biodiversity can be avoided.

Objectives

27. The table below demonstrates how the LDP Strategy meets the LDP Objectives.

LDP Objective	Commentary
A) Mitigate and respond to the challenge of Climate Change	60/40 strategy uses a settlement hierarchy to direct growth to settlements with a good level of services, thereby reducing the need to travel. A 60/40 split reflects the current population distribution and critically also supports existing settlements' services and facilities. A requirement for all new dwellings to include ULEV charging points increases the potential for travel via private car to release lower levels of carbon.
B) Deliver high quality development where place making is supported by sustainable design which responds appropriately to cultural and built heritage, landscape and townscape.	The Deposit Plan includes a range of policies to support sustainable design. The Strategy and Candidate Site methodology has been designed to ensure that only appropriate sites are included within the settlement boundary, which respond to cultural and built heritage, landscape and townscape.
C. Sustain and enhance the rural and urban economy by supporting start up businesses, rural diversification, changing agricultural practices, the Visitor Economy and the expansion of Small and Medium Enterprises.	The Strategy supports growth opportunities that are appropriate to the varied geographical locations across the Plan area. This includes identification of rural opportunities for diversification and the Visitor economy. This approach offers employment opportunities, which reflect the current geographic population distribution.
D. Sustain resourceful communities by providing a range and mix of homes supported by key community facilities and services.	As set out in Section 2, the need for Affordable Housing exists across the rural areas of the Plan as well as the urban. The Plan's strategy uses a Settlement Hierarchy to ensure that within the more rural areas homes are supported by key facilities and services.
E. Build on the County's strategic location for Green/Blue energy, maritime and port related development.	The 60% Urban focus allows for the distribution of housing growth to those areas identified around the Milford Haven Waterway and Goodwick Harbour for growth linked to Green/Blue energy, maritime and port related development.
F. Protect and promote the Welsh language.	The strategy enables growth within the North East of Pembrokeshire despite the lack of urban centres in this location. This approach is important in supporting welsh language communities.

G. Support a range of uses in Town Centres to assist regeneration.	This approach is reflected in the Plan's strategy and retail policies/ town centre boundaries.
H. Promote accessible and healthy environments for both people and wildlife through the protection and delivery of green infrastructure.	This approach is incorporated into the Plan's policies and allocations.
I. Improve access to goods and services by facilitating improvements in infrastructure and community facilities and directing development to sustainable locations.	The Strategy uses a Settlement Hierarchy to ensure development is directed to sustainable locations and at a level appropriate to its position in the hierarchy. GN. 3 allows for improvements in infrastructure including broadband.
J. Protect and enhance the County's environment, biodiversity and habitats.	The Urban/Rural split accompanied by the Settlement hierarchy approach and policies around settlement boundaries, landscape and biodiversity together provide a strategic framework to protect and enhance the County's environment.
K. Prevent waste arising and ensure resources are used responsibly.	The policy approaches in the Plan as a whole assist in delivering this objective.

Section 4: National Placemaking Objectives

28. The Gateway test in PPW Edition 10 requires strategies to be assessed against the Strategic and Spatial Choices issues and the national sustainable placemaking outcomes. The assessment of the strategy against the national sustainable placemaking outcomes is set out below:

National Placemaking Objective	LDP Deposit Policy	Strategy
Maximising Environmental Protection and Limiting Environmental Impact		Because the strategy spreads development over a wider range of settlement within the rural areas, the site selection process has had a greater choice of sites and has been able to focus on those sites with the lowest environmental impact. This includes the prioritisation of the limited range of previously developed land sites available within the Plan area. The Plan's strategy has enabled the Authority to withdraw and limit further residential growth in areas vulnerable to climate change from rising sea levels, many of which are within the Urban Settlements (see GN 36).
Has resilient biodiversity and ecosystems	SP 11, GN 35 and 39	
Has distinctive and special landscapes	SP 11, GN 38	
Has integrated green infrastructure	SP 11, GN 35, GN 40 and GN 41	
Has appropriate soundscapes	GN 1	
Reduces environmental risks	SP 11, GN 1	
Manages water resources naturally	SP 11, GN 1 and GN 2	
Has clean air	SP 11, GN 1	
Reduces overall pollution	SP 11, SP 19	
Is resilient to climate change	SP 11, GN 2, GN 4, GN 5, GN 35	
Has distinctive and special historic environments	GN 22	
Facilitating Accessible and Healthy Environments		The Plan's strategy is based around a Settlement Hierarchy. This weighted system where settlements are identified in groups according to the facilities and services within them ensures larger
Has accessible and high quality green space	SP 11, GN 40 and GN 41	
Is accessible by means of active travel and public transport	SP 18, GN1 and GN 30	
Is not car dependent	GN 1	

Minimises the need to travel	SP 5	development proposals are directed to areas with good levels of services. This in turn minimises the need to travel.
Provides equality of access	SP 3, GN 13	
Feels safe and inclusive	GN 2, GN 13	
Supports a diverse population	SP 2 and SP 3, GN 13	
Has good connections	SP 18, GN 1, GN2 and 30	
Has convenient access to goods and services	SP 5	
Promotes physical and mental health and well being	GN 2, GN 13, GN 35, GN 40 and GN 41	
Making Best Use of Resources		
Making best use of natural resources	SP 5, SP 6, SP 11, SP 16, GN 1	Where appropriate for development previously developed land has been identified within settlement boundaries and where deliverable allocated. Settlement boundaries play an important role in identifying areas of land which are appropriate for development and in protecting the environment. A range of policies encourage appropriate economic activities across both rural and urban areas.
Prevents waste	SP 19, GN 46, GN 47	
Prioritises the use of previously developed land and buildings	SP 6, GN 1	
Unlocks potential and regenerates	SP 7 – 10, GN 6-10, GN 25, GN 26,GN 27,GN 31-34, GN 42-45	
Is of high quality and built to last	GN 2	
Growing our Economy in a Sustainable Manner		
Fosters economic activity	GN 6 – 10, GN GN 31-34, 42-43	A range of policies encourage appropriate economic activity across the Plan area. The Plan aims to support the growth of renewable energy through policies and allocations and to adapt to climate change by identifying areas at risk during the Plan period from sea level change. New technology such as ULEV charging points are required for all new
Enables easy communication	GN 21	
Generates its own renewable energy	GN 4, GN 5	
Is vibrant and dynamic	GN 2	
Is adaptive to change	GN 1, GN 2, GN 31- 34, GN 36,	
Embraces smart and innovative technology	GN 2, GN 21	

		dwelling. The Plan establishes a policy to support appropriate innovative technology.
Creating and Sustaining Communities		
Enables the Welsh language to thrive	SP 17	The Plan's strategy in supporting rural communities enables welsh language communities to develop. Housing densities and specific requirements for Lifetime Homes standards and space standards reflect the particular issues facing the Plan area over the Plan period. Policies within the Plan enable community facilities to be supported and cultural assets to be protected.
Has appropriate development densities	GN 11	
Has homes and jobs to meet society's needs	SP 2, SP 3, GN 11, GN 13	
Has a mix of uses	GN 6	
Offers cultural experiences	GN 22, GN 23, GN 24	
Has community based facilities and services	GN 23, GN 24	

29. With regards to assessment against the Strategic and Spatial Choices issues and the issues under Active and Social Places, Distinctive and Natural Places, Productive and Enterprising Place, the evidence and the policies demonstrating how these have been incorporated into the LDP Strategy are set out in the Table below.

PPW Section and Issue	Policy/Evidence base	Evidence Base/Strategic Approach
Strategic and Spatial Choices		
Good Design	GN 2 and GN 13	The General principles all proposals will have to meet are set out in GN 1 in line with PPW 10 requirements. Sustainable design is promoted by GN 2. This includes a requirement for all new dwellings to incorporate a ULEV charging point to promote sustainability. GN 13 with evidence from the emerging Regional Housing Market Assessment and the

		Council's Preliminary Viability Assessment promotes the use of space standards and requires a percentage of new homes to be built to Lifetime Homes Standards to meet the needs of Pembrokeshire ageing population.
Promoting Healthier Places	SP 5 , GN 3, GN 23, GN 24, GN 35,GN 40, GN 41	The Plan includes specific policies on Green Infrastructure, Open space and sustainable transport aimed at promoting healthier places. The Plan's strategy has been assessed via the SA and through an Equalities Impact Assessment. GN. 3 will enable the Authority to negotiate specific planning obligations for new open space and community facilities where appropriate. The Plan strategy considers the location of key access to community and health assets such as community halls, libraries, doctor's surgeries and hospitals in its identification of the Settlement Hierarchy.
The Welsh Language	SP 17	As set out in Section 3, the strategy has been identified in part to support rural communities including the predominantly Welsh speaking communities in NE Pembrokeshire.
Sustainable Management of Natural Resources	SP 11	The Plan includes a new strategic policy on the Environment, supported by General policies on biodiversity, landscape and coastal change. The Settlement Boundary methodology and the

		Candidate Site methodology have ensured that the environment is protected. The Plan's Development Sites and Infrastructure SPG will identify opportunities for green infrastructure on allocations.
Placemaking in Rural Areas	SP 10 Countryside, GN 4, GN 5, GN 36	The Plan includes a policy for the Countryside in line with PPW guidance. PPW also requires Plan's to ensure that the countryside is resilient to the impacts of climate change and plays a role in reducing the causes of climate change, both addressed by policies on Renewable Energy and Coastal Change in the Plan.
Strategic Planning	SP 1 – 10	The Strategy has been developed in accordance with PPW on this. See Preferred Strategy, Sustainability Appraisal, Rural Facilities Survey 2019, Urban Settlements Survey 2019, Candidate Site Methodology.
Managing Settlement Form	SP 6 and GN 37	See Background Paper on Green Wedges and Background paper on Settlement Boundaries.
Productive and Enterprising Places		
Economic Development	SP 4, SP 12, SP 13, GN 3, GN 6 – 10, ,	See Pembrokeshire Economic Profile and Two County Economic Study.
Tourism	GN 42 - 43	See the Caravan, Camping and Chalet Landscape Capacity Assessment.
The Rural Economy	GN 7, GN 27	See Site Assessment Report for assessment of Local Employment

		Allocations and Two County Economic Study. Agricultural Diversification addressed by GN 27.
Transportation Infrastructure	GN30	See AMRs on delivery of safeguarded schemes.
Telecommunications	GN 21	See policy GN 21,
Energy/Minerals/Waste	GN 4, GN 5GN 31 - 34	See Renewable Energy Assessment, Minerals Background Paper, Waste Background Paper and Minerals Statement of Common Ground
Distinctive and Natural Places		
Landscape	GN 1 and GN 38	See Landscape Character Assessment
Coastal Areas	GN 1 and GN 36	See SFCA and Proposals Maps for areas identified at risk from Climate Change and covered by GN 36.
Historic Environment	GN 22	
Green Infrastructure	GN 35, GN 40 - 41	See Council's Green Infrastructure Plan and Open Space Background reports
Biodiversity	GN 39	
Water, Air, Soundscape and Light	GN 1	
Flooding	GN 1 and GN 36	See Council's SFCA and Proposals Maps.
De-risking	GN 1	See Council's Site Assessment and Candidate Site Methodology which includes feedback from Public Protection.
Active and Social Places		
Transport	SP 5, SP 18, GN 1, GN 2 and GN 30	See AMRs for delivery of safeguarded schemes. Rural Facilities Survey and Urban Settlements Survey includes weighting for public transport in identifying the settlement hierarchy. GN 2 includes

		a specific requirement for new dwellings to incorporate a ULEV charging point.
Housing	SP 1, SP 2, GN 11- 18	See Demographics Forecasts Paper, Demographic Forecasts Paper Addendum, Calculation of Windfall Allowance Background Paper.
Retail and Commercial Centres	SP 14, GN 25, GN 26	See SW Wales Regional Retail Study and Appendices 2017, Retail and Commercial Centres Background Paper 2019 also Regeneration Framework documents for Fishguard and Goodwick, Haverfordwest, Milford Haven (Draft) and Pembroke and Pembroke Dock.
Community Facilities	GN 23, GN 24	
Recreational Spaces	GN 40 and GN 41	See Open Space Background Paper.

Conclusions

30. Section 1 demonstrates that for the current Local Development Plan, the 60/40 Urban/Rural split is being delivered, but that some of the larger sites within the Urban settlements have not come forwards. The Authority considers that in terms of deliverability – a 70/30 strategy which would require the allocation of a greater proportion of large sites within the Urban settlements might not be deliverable. The Authority also notes that the current strategy has been largely successful in maintaining services within the Plan’s rural areas.
31. Section 2 considers key issues from the evidence base that need to be addressed through the Spatial Strategy, in accordance with Welsh Government guidance. This concludes that key areas of the evidence base that require consideration in establishing the Strategy support the delivery of a 60/40 Urban Rural split. This Strategy when supported by a Settlement Hierarchy approach and detailed policies on Affordable Housing, Employment and Landscape can address the major issues facing the Plan area.
32. Section 3 demonstrates how the Strategy addresses both the LDP Vision and Objectives.
33. Section 4 demonstrates that the Strategy and policies of the Plan address the Welsh Government’s gateway test and the national sustainable placemaking outcomes. It also demonstrates how the Plan addresses the Issues identified under the separate headings within Planning Policy Wales (Edition 10)
34. In conclusion, the LDP Strategy and its policies respond to the Council’s monitoring information and key area of the evidence base. The LDP Strategy addresses both the LDP Vision and its Objectives. The LDP Strategy also meets Welsh Government’s requirements set out within Planning Policy Wales (Edition 10) and the emerging Draft Local Development Plan Manual Edition 3.