

Thomas, Kane

From: [REDACTED]
Sent: 15 December 2024 17:22
To: LDP - For Enquiries
Subject: Objection to LDP 2 from Residents of Southlands, St Daniels Hill, Pembroke
Attachments: - Completed Deposit Plan 2 Representations Form.doc; Supplemental objection document .docx; Sedgwick Report docv.3 2024.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: D Rep

EXTERNAL EMAIL – Exercise care with links and attachments *E-BOST ALLANOL – Byddwch yn ofalus wrth agor dolenni ac atodiadau.*

I attach three documents which together form Representations/Objections to the updated Local Development Plan 2 published by yourselves on 24th October 2024.

Whilst the form is in the name of my wife and myself it is supported by other residents of Southlands who are listed on the documentation.

As I did in the first iteration of LDP 2 in 2020 I will be depositing a hard copy of all three documents, marked for your attention at County Hall tomorrow 16th December.

Please acknowledge receipt of these Representations/Objections.

Regards

Stuart Walder



Hoffem gael eich barn am y Cynllun Datblygu Lleol ac ar ddogfennau sy'n cefnogi'r Cynllun Datblygu Lleol. Dylid defnyddio'r ffurflen hon ar gyfer pob sylw (h.y. sylwadau neu wrthwynebiadau) Mae fersiynau nodiadau cyfarwyddyd ar gael o <https://www.sir-benfro.gov.uk/adolygur-cynllun-datblygu-lleol/adneuo>.

*Sylwch: **Ni fydd** sylwadau a wneud ar Gynllun Adneuo 2020 yn cael eu symud ymlaen ac mae angen gwneud sylwadau newydd ar y Cynllun Adneuo presennol hwn.*

Os ydych yn cyflwyno copi papur, atodwch dudalennauychwanegol lle bod angen. Mae gan y ffurflen hon ddwy ran: Rhan A (Manylion personol) a Rhan B (eich sylw). Sylwer y bydd Rhan B ar gael i'r cyhoedd a chaiff ei hanfon at Yr Arolygiaeth Gynllunio.

Mae'n rhaid derbyn eich sylwadau erbyn hanner nos Rhagfyr 16eg 2024. Dychwelwch ffurflenni at: ldp@pembrokeshire.gov.uk neu Y Tîm Cynlluniau Datblygu, Neuadd y Sir, Freeman's Way, Hwlfordd, Sir Benfro, SA61 1TP

We would like your views on the Local Development Plan (LDP) and also on documents which support the LDP. This form should be used for all representations (i.e. comments or objections). Electronic versions and guidance notes are available at <https://www.pembrokeshire.gov.uk/local-development-plan-review/deposit>

*Please note: Representations made on the 2020 Deposit Plan will **not** be taken forward and it is necessary to make new representations on this current Deposit Plan.*

If you are submitting a paper copy, attach additional sheets as necessary. This form has two parts: Part A (Personal details) and Part B (Your representation). Please note that Part B will be made publicly available and will be forwarded to the Planning Inspectorate.

Your representations must be received by midnight 16 December 2024. Please return forms to: ldp@pembrokeshire.gov.uk or The Development Plans Team, County Hall, Freeman's Way, Haverfordwest, Pembrokeshire SA61 1TP

RHAN A: Manylion cysylltu
PART A: Contact details

Eich manylion/manylion eich cleient
Your / your client's details

Manylion yr asiant (os ydynt yn berthnasol)
Agent's details (if relevant)

Enw Name	Stuart & Fiona Walder and neighbours	
Teitl swydd (lle y bo'n berthnasol) Job title (where relevant)		
Sefydliad (lle y bo'n berthnasol) Organisation (where relevant)		
Cyfeiriad Address	REDACTED	
Rhif ffôn Telephone no	REDACTED	
E-bost Email address	REDACTED	
Llofnodwyd (gallwch teipio) Signed (can be typed)	Stuart G Walder	Fiona Walder
Dyddiad Date	9th December 2024	



RHAN B: Eich sylw

PART B: Your representation

Eich enw / sefydliad

Your name / organisation

Ourselves and the neighbours indicated on attached sheet

In addition Mr & Mrs S Harries @ **REDACTED** wish to be associated with the objection but were unavailable to sign.

1. Ar ba ran/rannau o'r Cynllun (neu ddogfennau ategol) rydych yn rhoi sylwadau?

1. Which part(s) of the Plan (or supporting documents) are you commenting on?

Rhif(au) polisi Cynllun Datblygu Lleol neu ddyraniad safle
LDP policy or site allocation number(s)

Housing Allocation Sites
HSG/095/LDP2/2 & HSG/095/LDP2/5

Rhif(au) paragraff y Cynllun Datblygu Lleol neu adran
LDP paragraph or section number(s)

Cyfeiriad(au) Map Cynigion y Cynllun Datblygu Lleol
LDP Proposals Map reference(s)

Os yw eich sylw yn perthyn i ddogfen ategol (e.e. y Gwerthusiad o Gynaliadwyedd), rhowch yr enw(au) a'r cyfeiriad(au) i mewn yma.
If your representation relates to a supporting document (e.g. the Sustainability Appraisal), insert the name(s) and reference(s) here.

As detailed in continuation sheets and report by Peter Sedgwick Planning attached.

2. Cyn i chi esbonio eich sylwadau'n fanwl, byddai'n dda gwybod p'un a gredwch fod y Cynllun yn gadarn ai peidio, ac a yw'n bodloni'r gofynion gweithdrefnol.

I gael rhagor o wybodaeth am gadernid a gofynion gweithdrefnol, gweler y nodiadau cyfarwyddyd.

2. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements.

For more information on soundness and procedural requirements, see the guidance notes.

Rwyf o'r farn bod y CDLI yn gadarn ac yn bodloni gofynion gweithdrefnol.

I think the LDP is sound and meets procedural requirements.

No

Rwyf o'r farn nad yw'r CDLI yn gadarn ac y dylid ei newid.

I think the LDP is unsound and should be changed.

Yes

Rwy'n credu na chafodd y gofynion gweithdrefnol eu bodloni.

I think that the procedural requirements have not been met.

3. A hoffech i'r Cynllun gynnwys polisi, dyraniad safle neu paragraff newydd?

Ticiwch bob un sy'n berthnasol.



3. Would you like the LDP to include a new policy, site allocation or paragraph?

Tick all that apply.

Dyraniad safle newydd

New site allocation

√

Polisi newydd

New policy

Paragraff neu destun ategol newydd

New paragraph or supporting text

4. Os ydych am ychwanegu dyraniad safle newydd, a wnaethoch gyflwyno'r safle yn flaenorol fel y safle cais? Os felly, a fydddech cystal â rhoi enw a chyfeiriad y safle cais (os yw'n hysbys).

4. If you want to add a new site allocation, have you previously submitted the site as a Candidate Site? If so, please give the Candidate Site name and reference (if known).

Enw'r safle

Site name

Suggested consideration of a new site in Pembroke Dock west of A4139 Ferry Lane and immediately north of B4322 Pembroke Road.

The failure of the Deposit LDP 2 to consider this site is indicative of PCC not properly assessing potential housing sites in line with the sequential tests in Planning Policy Wales – Edition 12(February 2024)

Cyfeiriad y cais

Site reference

Os ydych am awgrymu safle newydd, dylech atodi cynllun o'r safle yn nodi ffiniau'r safle rydych am eu cynnwys yn y Cynllun a rhoi manylion am ei ddefnydd arfaethedig. Dylech ystyried a oes angen i'r ffurflen sylwadau hon gael ei hategu gan arfarniad o gynaliadwyedd. Lle bo gan newidiadau arfaethedig i Gynllun Datblygu effeithiau cynaliadwyedd sylweddol, bydd angen i chi ddarparu'r wybodaeth berthnasol ar gyfer arfarnu cynaliadwyedd. Mae'n rhaid i'r wybodaeth hon fod yn gyson â chwmpas a lefel manylder yr arfarniad o gynaliadwyedd a gynhaliwyd gan yr Awdurdod. Dylai hefyd gyfeirio at yr un wybodaeth waelodlin wrth amlygu effeithiau sylweddol tebygol y polisi arfaethedig neu safle newydd.

If you want to suggest a new site, please attach a site plan identifying the boundaries of the site you wish to be included in the Plan and provide details of its proposed use. You should consider whether it is necessary for this comments form to be accompanied by a sustainability appraisal. Where proposed changes to a development plan have significant sustainability effects, you will need to provide the relevant sustainability appraisal information. This information must be consistent with the scope and level of detail of the sustainability appraisal conducted by the Authority. It should also refer to the same baseline information in identifying the likely significant effects of the revised policy or new site.

5. Rhestrwch eich sylwadau isod.

Dylech gynnwys yr holl wybodaeth, tystiolaeth a gwybodaeth ategol sydd eu hangen i gefnogi/cyfiawnhau eich sylw. Nodwch pa brawf/proffion cadernid mae'r Cynllun Datblygu Lleol yn eu



bodloni neu nad yw'n eu bodloni a pham (gweler y nodiadau cyfarwyddyd i gael rhagor o wybodaeth). Bydd hyn yn helpu'r Awdurdod a'r Arolygydd i ddeall y materion y byddwch yn eu codi. Dim ond os bydd yr Arolygydd yn eich gwahodd i fynd i'r afael â materion y bydd yn eu codi y byddwch yn gallu cyflwyno rhagor o wybodaeth i'r archwiliad. Sylwer na fydd yr Arolygydd wedi gallu gweld unrhyw sylwadau y gallech fod wedi'u gwneud mewn ymateb i ymgynghoriadau blaenorol.

5. Please set out your comments below.

Include all the information, evidence and supporting information necessary to support / justify your representation. Please indicate which soundness test(s) the LDP meets or does not meet, and why (see guidance notes for more information). This will help the Authority and the Inspector to understand the issues you raise. You will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise. Please note that the Inspector will not have access to comments you may have made in response to previous consultations.

Ticiwch yma os ydych chi'n cyflwyno deunydd ychwanegol i gefnogi eich sylw.

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

✓

6. Os ydych yn gwrthwynebu'r Cynllun Datblygu Lleol, ydych am siarad mewn sesiwn gwrandawriad yr Archwiliad cyhoeddus?

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

6. If you are objecting to the LDP, do you want to speak at a hearing session of the public examination?

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

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

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

Rwyf am siarad mewn sesiwn gwrandawriad.

I want to speak at a public hearing.

Yes

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



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

I would wish to speak about:

Overall housing target

Relative housing allocation between Pembroke Dock and Pembroke

Suitability of Candidate Sites 302 & 411 as Housing Allocation Sites HSG/095/LDP2/2 & HSG/095/LDP2/5

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

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

Rwy'n dymuno cael fy nghlywed yn Gymraeg.

I wish to be heard in Welsh.

No

Rwy'n dymuno cael fy nghlywed yn Saesneg.

I wish to be heard in English.

Yes

Deposit LDP Representations Form

The undersigned residents of Southlands, St Daniels Hill, Pembroke wish to be party to the Deposit LDP Representation Form submitted in the name of Stuart and Fiona Walder of 6 Southlands, St Daniels Hill, Pembroke.

We believe the Deposit LDP is neither sound nor appropriate and that Housing Allocation Sites HSG/095/LDP2/2 and LDP2/5 should be removed from the plan as they are part of an unnecessary allocation of housing land in Pembroke.

Full details and the evidence base for our objections are in the documentation attached.

NAME (Print)	House No	Signature	Date
BRIAN EVANS	17		6.12.24
JILL EVANS	17		6.12.24
Monica Vanner	1		6-12-24
HUGH WESTWOOD	21		10/12/24
DAVID WESTWOOD	21		11/12/24
NEIL WILLIAMS	2		11/12/24
JANICE WILLIAMS	2		11/12/24
JOHN DELAHUNTY	19		11/12/24
IRGNE DELAHUNTY	19		11/12/24
SARA NEALE	4		12/12/24
BOB DAVIES	9		14/12/24
TERESA DAVIES	9		14-12/24

Objection to the inclusion of the following Allocated Sites in plan

HSG/095/LDP2/2 Land South-West of Southlands, St Daniel's Hill, Pembroke
HSG/095/LDP2/5 Land South-East of Southlands, St Daniel's Hill, Pembroke.

Following detailed analysis by Peter Sedgwick Planning, (Chartered Town Planner), we object to the inclusion of the above allocated sites on the grounds that LDP 2 is unsound for the following three prime reasons:

Overall Housing Requirement

The housing requirement figures in the Deposit LDP 2 are excessive. They are more than a third higher than the Welsh Government requirement and nearly double that which would be supported by employment and do not reflect the 10-year average net migration rates, or the requirement calculated by the Council's own Local Housing Market Assessment

Consequently, there has been an oversupply of land allocated for housing and the LDP is therefore not appropriate and unsound in this regard.

Housing Supply in Pembroke and Pembroke Dock

Pembroke has been allocated a disproportionate amount of housing land compared to Pembroke Dock its nearest urban neighbour (more than double). This contradicts the settlement strategy which seeks to allocate housing land to those settlements with the most facilities, proportional to the size of the settlement. Clearly Pembroke Dock is a more sustainable settlement than Pembroke in terms of its size, services, transport links and access to employment.

As such LDP 2 is not appropriate and is unsound in this regard.

To overcome this issue there should be a review of housing sites in Pembroke and Pembroke Dock with a view to removing sites in Pembroke, (including housing allocation sites *HSG/095/LDP2/2* and *HSG/095/LDP2/5*) and increasing the provision of housing land in Pembroke Dock.

Alternative housing land in Pembroke Dock

In preparing the LDP PCC has failed to properly assess potential housing land in line with the sequential tests in Planning Policy Wales paragraph 4.2.17. Alternative land that could have met the housing needs of Pembroke Dock was overlooked and instead higher quality farmland encroaching the countryside to the south of Pembroke (including the two sites adjacent to Southlands) has been allocated inappropriately.

LDP 2 is unsound in this regard.

The full report by Peter Sedgwick Planning ref 01/20WALDv3. Is attached and forms an integral part of this objection.

In addition to the three prime objections outlined above we consider that LDP 2 also fails the test of soundness in relation to the sites adjacent to Southlands for the reasons outlined below:

The inclusion of Allocated Sites (HSG/095/LDP2/2 & 5) in the Deposit LDP is at variance with several of the main policies in both WG and PCC planning policies and guidance.

For each area of our submissions an abstract of the policy is shown followed, **in red text**, by the grounds on which we believe the inclusion of the sites is at variance with the policy outlined.

SP 2 Housing Requirement

Policy states:

New homes will be developed mainly on land allocated specifically for housing and in sustainable locations within defined Settlement Boundaries, with care taken to protect and enhance the natural and built environment.

No justification is made to allocate land outside the Settlement Boundary defined in the first LDP adopted in 2013.

SP6 Settlement Boundaries

At 4.26 policy states:

Settlement Boundaries ensure that development takes place in sustainable locations and that the natural environment is protected.

In 2012, during the LDP 1 evaluation it was accepted that Candidate Site 411 was outwith the settlement boundary and therefore should not become an Allocated Site. The same situation now applies to both the sites adjacent to Southlands, they are outside the settlement boundary and therefore encroach on the natural environment.

GN 1 General Development Policy

Relevant elements of this policy state:

Development will be permitted where the following criteria are met:

- 1. The nature, location, siting and scale of the proposed development is compatible with the capacity and character of the site and the area within which it is located.*

The two allocated sites are indicated to provide 45 housing units at a density of 30 per hectare. This is four times the density of Southlands and other modern housing south of Pembroke Commons and hence totally out of character with the area.

- 2. It would not result in a significant detrimental impact on local amenity in terms of visual impact, loss of light or privacy,*

Existing Southlands properties are at an elevation of between 25 and 30 metres above Ordnance Datum. The most southerly properties on the allocated sites would be about 40m above OD and thus overlooking, blocking views and impacting the privacy of Southlands residents. The developments will also be detrimental to the overall view including intruding into the ridgeline view south from Pembroke Castle and Town centre.

3. *It would not cause an unacceptable adverse effect (a harmful impact that cannot be satisfactorily mitigated) on landscape character,*

Development of the allocated sites would substantially change the landscape viewed from the historic Castle and Town of Pembroke.

6. *It would take place in an accessible location, would incorporate sustainable transport and accessibility principles and would not result in a detrimental impact on highway safety or in traffic exceeding the capacity of the highway network;*

The sites would only be accessible by road and foot. There is no public transport serving the area. The highway infrastructure within Southlands and to its junction with St Daniels Hill is designed to serve 13 properties. Development of the allocated sites would bring this number to 58, more than four times the existing load with consequential risks to both safety and capacity of the system particularly at the junction with the B4319 outside the 30mph restricted section.

At 5.3 policy states:

The amenity enjoyed by people in their homes, workspaces and recreational areas will be protected from harmful, inappropriate development. Amenity is defined as those elements in the appearance and layout of settlements and the countryside which make for a pleasant life.

Southlands is currently a low density development contiguous with the settlement boundary and hence immediately adjacent to open countryside. If housing were developed on the proposed Allocated Sites Southlands would be absorbed into the urban area, deprived of its adjacent countryside, and become a thoroughfare for foot and vehicular traffic, all in all a significant loss of amenity.

GN 2 Sustainable Design

Development will be permitted where relevant criteria are met:

- 1.*It is of a good design which pays due regard to local distinctiveness and contributes positively to the local context;*

Adding a development with a housing density of 30/ha cannot but have a negative contribution to the local context of a development of properties built at a quarter of that density.

- 2.*It is appropriate to the local character and landscape/townscape context in terms of layout, scale, form, siting, massing, height, density, mix, detailing, use of materials, landscaping and access arrangements / layout;*

The developments envisaged for the two allocated sites cannot be appropriate to the existing local character and landscape. The scale, height, density and access arrangements could not comply with this Sustainable Design policy.

At 5.26 policy states:

The public realm should be considered as an integral element of the design process. Development proposals should be designed, constructed and maintained to create a good quality, accessible and vibrant public realm that relates well to adjoining streets and spaces

It is impossible to conceive that the envisaged development could possibly “relate well” with the existing development through which all access would have to be achieved.

GN 11 Residential Development

5.67 The principle of building new homes within Settlement Boundaries is supported as these are locations with good access to services.....

The two allocated sites adjacent to Southlands are outwith the existing Settlement Boundaries and there are no public transport facilities available nearby.

GN 38 Landscape

Policy states:

Development which would have an unacceptably adverse effect on the landscape will not be permitted. All proposals will be required to

Be well integrated into the landscape in terms of scale, siting and design and have an acceptable visual impact in relation to the characteristics and qualities of the landscape.

The two allocated sites adjacent to Southlands would undoubtedly have a **major** visual impact on the view to the south from the historic Castle and Town of Pembroke.

LDP Evidence Base - Landscape Character Assessment Overview Report

Final Report for Consultation (May 2022) states:

Planning for built form

- ☐ Locate new settlement growth in the least sensitive landscapes avoiding adverse effects on biodiversity and cultural heritage.
- ☐ Avoid intrusive skyline developments.

The two allocated sites adjacent to Southlands would undoubtedly have a **major** visual impact on the view to the south from the historic Castle and Town of Pembroke. New development on HSG/095/LDP2/5 would involve building up to and above the 40m contour line and would cause skyline intrusion when viewed from the town.

GN 39 Maintenance and Enhancement of Biodiversity

Policy states:

All development should demonstrate a positive approach to maintaining and, wherever possible, enhancing biodiversity and any development that would disturb or otherwise harm protected species or their habitats, or the integrity of other habitats, sites or features of importance to wildlife and individual species, will only be permitted in exceptional circumstances.

It is inevitable that disturbance of the bats known to be adjacent to Site 302 {HSG/095/LDP2/2} would occur should the site be allowed to be developed. It is difficult to conceive of appropriate exceptional circumstances that would permit such disturbance to a protected species.

Concluding Remarks

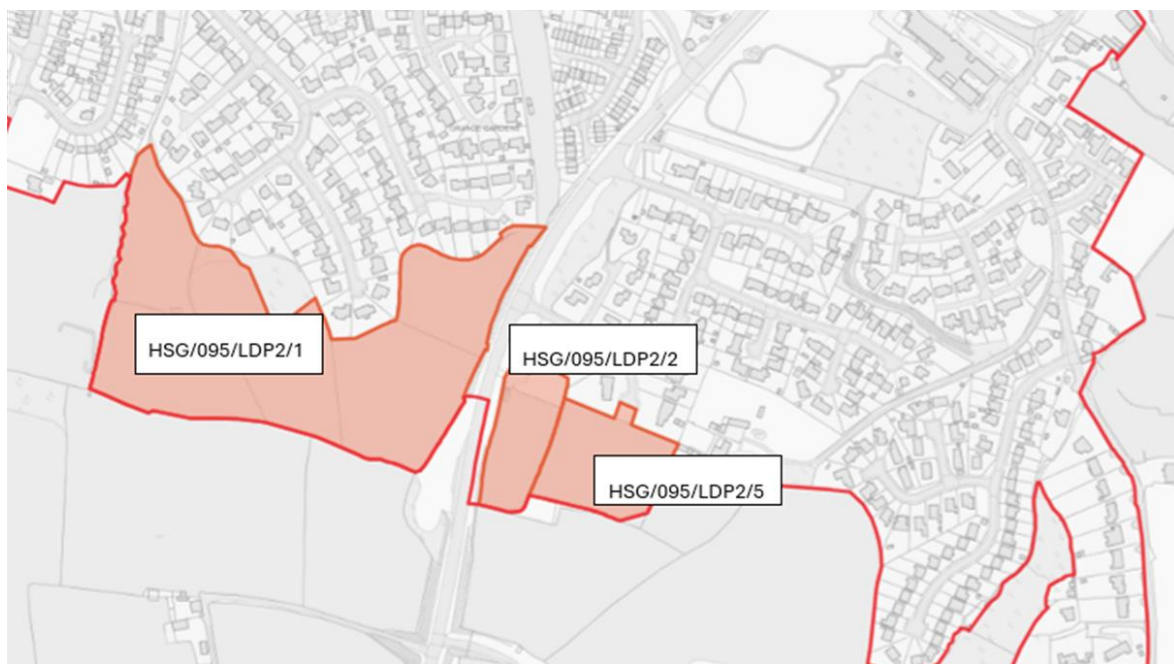
The plan is not sound because it fails test 2 “appropriateness” in that it is not appropriate for the area in the light of the evidence.

For the soundness reasons outlined above, it is our submission that both the two sites adjacent to Southlands should be removed as Housing Allocation Sites from the Draft Deposit Plan.



Peter Sedgwick Planning, [REDACTED]
Email [REDACTED]

Objection to Pembrokeshire County Council Local Development Plan Deposit Plan (LDP 2) on behalf of Mr Stuart Walder and other residents of Southlands.



Housing Allocation Sites HSG/095/LDP2/2 Land South-West of
Southlands, St Daniel's Hill, Pembroke and HSG/095/LDP2/5 land
South-East of Southlands, St Daniel's Hill, Pembroke.

Contents	2
1. Background.....	3
2. Scope of Report.....	3
3. The LDP Housing Requirement.....	5
4. Proposed Housing Supply in Pembroke and Pembroke Dock....	8
5. Alternative Housing Land.....	11
6. Conclusion.....	13

1. Background

- 1.1 In 2020 Peter Sedgwick Planning was commissioned to prepare a report providing evidence to substantiate a case for objecting to the first Pembrokeshire County Council (PCC) Local Development Plan 2 Deposit Plan (LDP 2) against the inclusion of two allocated housing sites in the Pembroke, HSG/095/LDP2/2 and HSG/095/LDP2/5. Following discussions, the client instructed that the report should identify a few key significant issues relating to the soundness of the plan that support the case for removing the allocated sites.
- 1.2 The consultation on LDP 2 ran until 18 March 2020. However, for various reasons, including the Covid 19 pandemic and new guidance regarding phosphate pollution which had implications for the deliverability of housing, progress on LDP 2 was delayed and further revisions to the Deposit Plan were required. A second version of the deposit plan has now been published for consultation and this report has been revised to take account of the changes to it and the background evidence in support of it, and to update references to National guidance where it has changed in the intervening years.

2. Scope of the report

- 2.1 Local Development Plan Examinations Procedure Guidance (November 2022), published by Planning and Environment Decisions Wales (PEDW), sets out the parameters within which local development plan examinations will be undertaken. Section 1.6 sets out the principles of the examination process stating that:
- “The role of the appointed Inspector is to carry out an independent assessment of the overall soundness of the plan and that it satisfies the statutory requirements for its preparation. The Inspector’s role is not to improve the LDP but to make recommendations to ensure it is sound. This means dealing with the main issues which go to the heart of the LDP and not getting involved with the details of the plan unless this is necessary to conclude on the Plan’s soundness.”*
- 2.2 The Local Development Plan Manual Edition 3 (March 2020) published by Welsh Government sets three tests or questions that need to be addressed in order to establish whether a Plan is sound. They are:
- Test 1: Does the plan fit? (i.e. is it clear that the LDP is consistent with other plans?)
 - Test 2: Is the plan appropriate? (i.e. is the plan appropriate for the area in the light of the evidence?)
 - Test 3: Will the plan deliver (i.e. is it likely to be effective?).

There are a series of sub-questions to help answer the key test questions. The most relevant to this report, which relate to whether the Plan is appropriate, are:

- Is it supported by robust, proportionate and credible evidence?
- Does it seek to meet assessed needs and contribute to the achievement of sustainable development?
- Have the 'real' alternatives been properly considered?

2.3 This report sets out to challenge the soundness of the PCC's LDP 2 on the grounds of whether it is appropriate in the light of the evidence. The report focusses on three key issues: over-supply of housing set by the housing target (Section 3); the disproportionately high number of houses allocated in Pembroke (section 4); and, the lack of consideration of more sustainable potential housing land in Pembroke Dock (section 5).

3. The LDP Housing Requirement.

- 3.1 This section looks at whether LDP 2 is supported by robust, proportionate and credible evidence? It analyses LDP 2's housing requirement to assess whether it is appropriate, and the Plan is sound in this regard.
- 3.2 Planning Policy Wales – Edition 12 (February 2024) (PPW) paragraph 4.2.6 states that the latest Welsh Government local authority level Household Projections for Wales will form a fundamental part of the evidence base for development plans. PPW notes that they should be considered together with other key evidence in relation to issues such as what the plan is seeking to achieve links between homes and jobs, the need for affordable housing, Welsh language considerations and the deliverability of the plan. PPW paragraph 4.2.7 further advises that where local planning authorities consider certain elements of the WG projections are not appropriate for their area they can undertake modelling to identify alternative options.
- 3.3 The previous version of this report raised concerns that the housing requirement set out in the first iteration of the deposit LDP 2 significantly exceeded that suggested as necessary, based on Welsh Government household projections. As noted in Pembrokeshire County Council's updated housing background paper¹ Welsh Government objected to the deposit plan on the same grounds as per the extract of the background paper below:

The Welsh Government raised an objection (Category B) to level of Growth identified in the Deposit 1 Plan – “The authority needs to explain why they are proposing growth significantly above the projections, the reliance and continuation of net in-migration and the relationship to economic growth levels. Evidence needs to demonstrate where in-migration will be derived from, i.e. neighbouring counties, elsewhere in Wales, the UK, or international migration taking into account the likely effect of UK immigration policy.” They added:

“The plan seeks to deliver a requirement 6,800 homes and 2,200 new jobs over the 16 year plan period, with a housing provision for 7,480 dwellings. The authority commissioned Edge Analytics to consider a range of demographic scenarios based on the Welsh Government's 2014 based population and household projections (and rebased on the 2016 mid-year estimates) dwelling-led scenarios and an employment-led forecast. The authority should reconsider these scenarios in light of the 2018 based population and household projections and the declaration of the climate emergency”

- 3.4 The second deposit LDP 2 housing requirement has been reduced by 1055 dwellings. Policy SP 2 now provides for approximately 6,425 dwellings over the Plan period which includes a 10% flexibility allowance. Paragraph 4.10 of the deposit Plan states

¹ Pembrokeshire County Council Housing Requirement Background Paper 2023

that the growth scenario has been identified by taking the average of the following three scenarios:

- WG 2018 based Long Term Population Projection which forecasts a need for 295 dwellings per annum;
 - Dwelling-led, 5 year average completion rate from 2014/15 to 2018/19 of 413 dwellings per annum;
 - Dwelling-led, 10 year average completion rate from 2009/10 to 2018/19 of 378 dwellings per annum.
- 3.5 The housing requirement figure in summary comprises a total of 5840 new dwellings over the Plan period (365 x 16 years) plus an allowance for 585 dwellings (10% i.e. 36.5 dwellings x 16 years), in order to allow for choice, flexibility, renewal of the existing housing stock and for non-take up of sites.
- 3.6 Paragraph 4.11 of LDP2 notes that the household requirement figure remains significantly higher (36%) than Welsh Government (WG) housing requirement projection of 295 dwellings per year. This, according to PCC, is justified because:
- WG figures were based on recent migration figures;
 - It will assist in meeting the significant backlog of affordable housing need;
 - It will support the local building industry and wider economy; it
 - It will deliver a more balanced population profile than that projected with lower growth levels;
 - It takes account of the potential impacts on the climate;
 - It will complement the anticipated provision of new jobs during the Plan period.
- 3.7 PCC considered higher migration figures were justified based on a report - Pembrokeshire Demographic Forecasts (July 2018) prepared by Edge Analytics (EA Report) - which takes account of longer migration trends (2001/02 – 2015/16) than those of the WG projections. This was undertaken in part to factor in the closure of a Milford Haven Oil Refinery, a major local employer, in 2014 which impacted significantly on net migration. figure 4 of the EA Report shows that average migration had already fallen from around 2009 i.e. before the significant drop in 2015 attributed to the closure of the Oil Refinery. Although net migration has fluctuated since 2009, it has not reached levels seen in any of the years from 2001 to 2008.

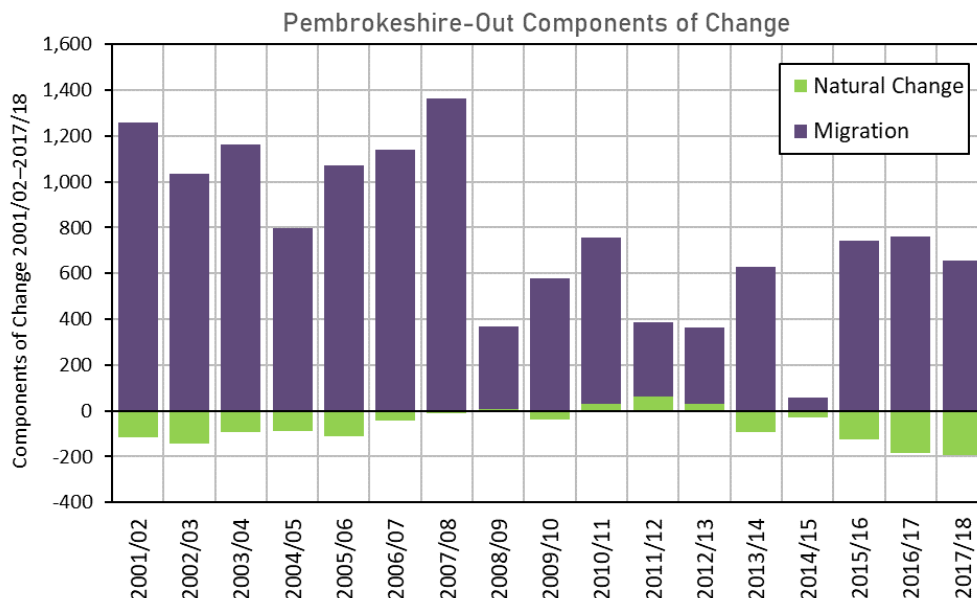


Figure 4 Pembrokeshire-Out components of population change 2001/02–2015/16 - EA report

3.8 The lower net migration since 2009 was likely caused by the financial crash. However, with uncertainty over the economy post Brexit, relying on higher levels of inward migration is not a sound basis on which to calculate the LDP housing requirement. A more realistic scenario for the maximum housing requirement would be to take the 10-year net migration average. This is identified as the PG 10yr scenario in the EA report which calculates the annual housing requirement as 245 dpa leading to a total over the Plan period of 3920 dwellings. A housing requirement falling between the WG figure and the PG10yr scenario would be a sound basis for projecting the housing requirement and significantly lower than that which is proposed in LDP 2.

3.9 Paragraph 4.10 of LDP 2 states that stakeholders supported the higher than WG housing requirement because, amongst other things, it would deliver a more balanced population profile than that projected under lower growth levels. The EA Report concluded that

“The high dwelling count of the dwelling-led scenarios drives higher net in-migration of young adults, with a corresponding increase in the 0–14 age range.”

This assumes that families will move to the area simply because there is more housing. This is a fundamentally flawed assumption.

3.10 The decision for a family to move will be based on a range of factors the most critical being whether there is suitable employment. The fact that net migration fell so dramatically because of the closure of a large employer is an obvious indication of this. PCC commissioned Edge Analytics to assess two additional growth scenarios published in the Pembrokeshire Additional Scenario Analysis – An addendum to the July 2018 Report (December 2018) (EA Addendum Report). One of the scenarios was employment led. It was based on an annual employment growth target from a PCC

commissioned report by Experian (September 2018). Paragraph 2.8 of the EA Addendum Report states:

*“Over the 2017–2033 plan period, the **Employment-led** scenarios results in similar population growth (2.9%) to the **WG-2014 (Rebased)** scenario, underpinned by the Experian forecasts and assumptions. The estimated population growth trajectory under the **Employment-led** scenario could support an estimated average annual dwelling growth of +191 dpa and +182 dpa over the 2017–2033 and 2021–2033 plan periods respectively. “*

- 3.11 This suggests that employment creation would not support the LDP 2 dwelling requirement. Paragraph 3.8 of the current deposit LDP2 notes that employment figures have been revised down to reflect of the more recent population and household projections and subsequent reduced housing provision figure for the Plan. Although it goes on to suggest that as many as 1000 additional jobs might be provided, related to the Celtic Freeport, it acknowledges that proposals are currently at too early a stage in their development to provide a more accurate estimate or differentiate between construction and operational phase jobs (Policy SP5). Paragraph 4.25 of LDP 2 further suggests that jobs associated with the construction phase are likely to be temporary and might significantly exceed the longer term operational-phase jobs. This was certainly the case with Pembroke Power Station. Therefore, there is currently no evidence to justify a higher housing requirement than would be necessary based on Welsh Government projections, on the basis of inward migration for jobs.
- 3.12 Furthermore, historically similar house building rates have not reduced the unbalanced population profile to date. Paragraph 2.8 and figure 6 of the Pembrokeshire Demographic Forecasts (July 2018) report prepared by Edge Analytics shows that between 2001 and 2016 the proportion of the population aged 65+ living in Pembrokeshire (outside the National Park) increased from 18% to 24% indicating “an older and more rapidly ageing population age profile than evidenced at national level”. Therefore, basing the housing requirement on past levels may perpetuate the population profile rather than address any imbalance.
- 3.13 Paragraph 4.12 of the Deposit LDP 2 states that the dwelling requirement includes a vacancy rate of 8.1% which includes an allowance for vacant homes, second homes and holiday accommodation. The Housing Requirement Background Paper 2023 notes that this figure was taken from the 2011 census. Notwithstanding the vacancy rate has not been updated to take account of the 2021 census, it is considered that the figure is too high as it would represent 514 dwellings (0.08×6425) which is more than 1 year’s housing supply. It is likely that vacant properties used as second or holiday homes, or empty because of probate delays or uncertain ownership, will be older rather than new properties. Also, holiday and second homes are more likely to be in tourist areas within the National Park area and not within LDP 2’s jurisdiction. Furthermore, the Council’s policy of charging 200% Council Tax on second homes will almost certainly reduce the number of properties. Therefore, applying such a high vacancy rate on top of the 10% additional allowance is excessive.

3.14 The Council's Local Housing Market Assessment (July 2021) (LHMA) provides a detailed assessment of the need for both market and affordable housing between 2020 and 2033, the end date of LDP 2. An extract of the LHMA is provided below:

5.23 The table below summarises the results for presented for each tenure individually above and shows the profile the new housing required in Pembrokeshire over the next 13 years.

Table 5.10 Profile of new accommodation required in Pembrokeshire					
<i>Size of home</i>	<i>Owner occupied</i>	<i>Private rented</i>	<i>Homebuy/ HWR</i>	<i>Shared Ownership/HTB</i>	<i>Social Rented</i>
1 bedroom	278	53	34	32	208
2 bedroom	749	63	46	70	159
3 bedroom	1,033	80	58	83	176
4+ bedrooms	496	88	38	62	278
Total	2,555	283	177	248	820

5.24 The outputs presented so far in this chapter are county-wide. The following sections provide the equivalent results for the National Park and non-National Park parts of the county separately, to reflect the planning distinction that operates within Pembrokeshire.



70

Adding all the above total figures the LHMA assessed the need for 4083 dwellings from 2020 to 2033 which equates to 314 dwellings per annum (dpa). The LDP2 requirement of 365 dpa exceeds that figure by over 50 dwellings which over a 13 year period would result in an oversupply of 650 dwellings (13 x 50) excluding the 10% additional allowance.

3.15 To conclude on this section of the report, the housing requirement figures in the Deposit LDP 2 are excessive. They are more than a third higher than the WG requirement and nearly double that which would be supported by employment and do not reflect the 10-year average net migration rates, or the requirement calculated by the Council's own Local Housing Market Assessment. They are also based on out of date vacancy rates which fail to take account of the location of second and holiday homes, most likely outside the LDP sphere of influence, and the impact of recent increases in Council Tax applied to them. Consequently, there has been an oversupply of land allocated for housing and the LDP is therefore not appropriate and unsound in this regard.

4. Proposed Housing Supply in Pembroke and Pembroke Dock

- 4.1 This section looks at whether LDP 2 meets assessed needs and contributes to the achievement of sustainable development? It assesses the proportion of housing supply directed to Pembroke and whether it would meet local needs and is consistent with LDP 2's strategy and the settlement hierarchy, particularly when compared to Pembroke Dock.
- 4.2 The spatial strategy in LDP 2 is to direct development to settlements based on a settlement hierarchy with an approximately 60% urban to 40% rural split for housing allocations. Policy SP6 - Settlement Hierarchy - states that the settlement hierarchy has been defined on the basis of functional characteristics and availability of services and facilities, (including sustainable transport), with respect also for the existing size and built character of a settlement. Paragraph 4.30 further states that the Settlement Strategy directs the greatest proportion of growth to those settlements with the most existing facilities and that development will therefore be proportional to the size of a settlement, its function and character, and based on current service provision.
- 4.3 PCC's Urban Settlements Report (September 2019) (with correction July 2024) (USR) ranked settlements according to the number and range of services within them. Pembroke Dock and Pembroke were ranked 3 and 4 respectively, below Haverfordwest (ranked 1) and Milford Haven (ranked 2). Appendix 1 of the USR illustrates how the ranking was identified comparing service provision for each town. Pembroke Dock scored higher than Pembroke for each of the following services (the figures are hyphenated with Pembroke Dock entered first followed by Pembroke):
- Strategic Employment Land allocated in LDP 1 (22.38 hectares, 0 hectares)
 - Community Halls (7,6)
 - Bus Services (5,3)
 - Hospital (1,0)
 - Dentist Surgery (2,1)
 - Opticians (3,0)
 - Pharmacy (3,2)
 - Public houses (25,15)
 - Children's Playground/sports areas (23/12)

Appendix 1 also includes population figures for Pembroke Dock (10,026) and Pembroke (7,964).

- 4.4 Paragraph 4.39 of LDP 2 describes Pembroke Dock as "a key service, employment and retail centre in south Pembrokeshire." Paragraph 4.40 describes Pembroke as an historic town which will benefit from developments that further strengthen the conservation of its impressive built and natural heritage. Its importance as a tourist destination and retail and service offer are also noted. The only employment land allocated in LDP 2 for Pembroke is a small (0.5 hectare) site for mixed retail,

commercial and community uses (MXU/095/LDP2/01). Whereas Pembroke Dock has been allocated 21.69 hectares of land.

- 4.5 Pembroke Dock is clearly more appropriate for higher levels of housing development than Pembroke because of its function, character, levels of service provision, employment opportunities and population size.
- 4.6 Table 2 below shows the housing allocations for the two settlements set out in Policy GN.14 - Residential Allocations.

Site ref	Site Name	Settlement	Minimum units	Area hectares
HSG/096/LDP2/1	Land at Hampshire Drive	Pembroke Dock	33	1.12
HSG/096/LDP2/2	West of Stranraer Road, Pennar	Pembroke Dock	59	1.99
HSG/096/00238	North of Pembroke Road	Pembroke Dock	38	1.52
	Pembroke Dock	Total	130	4.63
HSG/095/LDP2/1	Between St Daniels Hill & Norgans Hill	Pembroke	147	4.9
HSG/095/LDP2/2	South West of Southlands, St. Daniels Hill	Pembroke	19	0.64
HSG/095/LDP2/4	East of Golden Hill Road	Pembroke	50	1.68
HSG/095/LDP2/5	South East of Southlands St. Daniels Hill	Pembroke	26	0.87
HSG/095/00144	North of Gibbas Way	Pembroke	43	2.86
	Pembroke	Total	285	10.95

Table 2 housing allocations and totals for Pembroke and Pembroke Dock.

Pembroke has been allocated more than double the housing requirement and land allocated than in Pembroke Dock. However, Pembroke Dock has a significantly higher population than Pembroke (21%, or 2062 people).² Effectively land in Pembroke is being used to meet the housing needs of Pembroke Dock.

- 4.7 To conclude on this section of the report, Pembroke has been allocated a disproportionate amount of housing land compared to Pembroke Dock its nearest urban neighbour (more than double). This contradicts the settlement strategy which seeks to allocate housing land to those settlements with the most facilities, proportional to the size of the settlement and to reflect its function and character. Clearly Pembroke Dock is a more sustainable settlement than Pembroke in terms of its size, services, transport links and access to employment. As such LDP 2 is not appropriate and is unsound in this regard. To overcome this issue there should be a review of housing sites in Pembroke and Pembroke Dock with a view to removing

² 10,026 - 7964 = 2062 (difference in population). 2062/10026 x 100 = 21% (the percentage higher population for Pembroke Dock than Pembroke)

sites in Pembroke, including housing allocation sites HSG/095/LDP2/2 and HSG/095/LDP2/5, and increasing the provision of housing land in Pembroke Dock.

5. Alternative housing land

- 5.1 This section looks at whether 'real' alternatives have been properly considered in respect of the unequal distribution of housing between Pembroke and Pembroke Dock? Specifically, it identifies land in Pembroke Dock that would be suitable to meet the housing needs of the town. It's inclusion, or part of it, would alleviate pressure on Pembroke to provide for Pembroke Dock's housing needs.
- 5.2 PPW paragraph 4.2.17 requires local planning authorities to identify deliverable housing land in sustainable locations for development. A search sequence is set out starting with the re-use of previously developed and/or underutilised land within settlements, then land on the edge of settlements and then greenfield land within or on the edge of settlements. Paragraph 3.47 refers to locational aspects of identifying suitable sites such as accessibility, the provision of supporting infrastructure, managing urban form and the quality of agricultural land.
- 5.3 As noted above Pembroke Dock has been allocated considerably less housing land than Pembroke despite being a more sustainable location. There are obvious constraints to development in Pembroke Dock in that the Town is surrounded by water. The Cleddau River forms the northern and western boundary of the Town, Pembroke River runs to the south and Cosheston Pill bounds the North East of the Town. However, there is a significant area of land (11.4 hectares), figure 1 below, in the south east of Pembroke Dock that would be suitable for housing development. Allocating this land would meet the housing needs of the town, obviating the need to off-set provision in Pembroke.



Figure 1 Land to the west of Ferry Lane and North of Pembroke Road.

- 5.4 The western edge of the site adjoins housing allocation site HSG/096/00238. The land is opposite Pembroke School and has not been identified as a green wedge

necessary to retain the urban form. The western area is grade 3b agricultural land according to the predictive agricultural land classification map (ALC)³. It does not encroach on the open countryside as it sits between existing housing development to the north and the school to the south. The site is also surrounded by an Active Travel approved route as shown on figure 2 below.

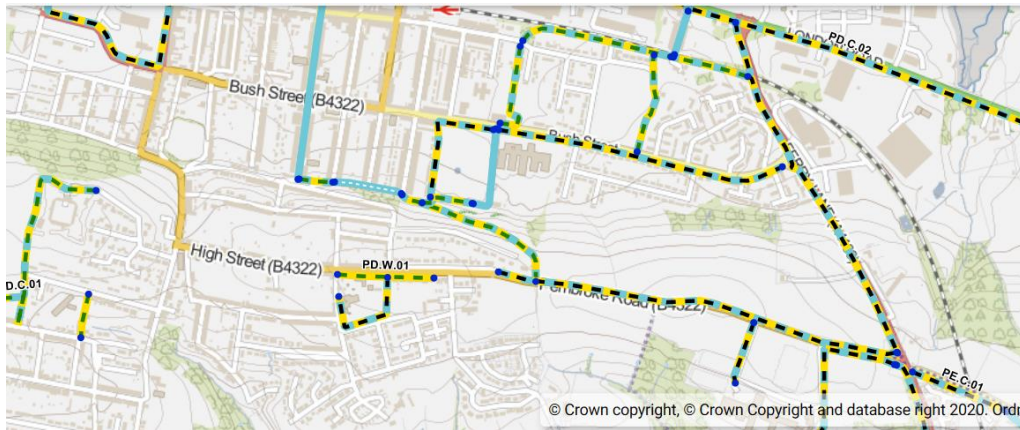


Figure 2 Active Travel Approved Route – source

<http://lle.gov.wales/catalogue/item/ActiveTravelApprovedRoutes/?lang=en>

- 5.5 The above site, or sections of it, would relate well to the urban form of Pembroke Dock and infill one of the few remaining areas suitable for development within the Town. There is no indication in the LDP2 evidence base that this area of land was considered during the Plan review, despite meeting PPW's sequential search criteria as an edge of settlement site. Consequently, land had to be found in Pembroke to meet the housing needs of Pembroke Dock including housing allocation sites HSG/095/LDP2/2 and HSG/095/LDP2/5.
- 5.6 The Pembroke Sites are on higher grade agricultural land (class 3a). They encroach into the open countryside rather than filling in a gap in the existing urban form. The sites are not directly linked to an active travel approved route. There are fewer employment opportunities in Pembroke than Pembroke Dock and residents would need to travel to Pembroke Dock for services such as the local hospital and supermarkets.
- 5.7 To conclude on this section of the report, PCC failed to properly assess potential housing land in line with the sequential tests in PPW. Alternative land that could have met the housing needs of Pembroke Dock was overlooked and instead land encroaching the countryside to the south of Pembroke has been allocated. As such LDP 2 is not appropriate and the Plan is unsound in this regard.

³ <http://lle.gov.wales/News?lang=en#16>

6. Conclusion

- 6.1 The housing requirement for LDP 2 is too high and therefore not appropriate. It exceeds the requirement identified in the Council's Local Housing Market Assessment and does not reflect the Welsh Government household projections or recent (10 year) net migration rates. The high vacancy rates assumed are flawed. The assumption that building more houses than are needed will create a more balanced population is also flawed, as demonstrated by the existing population profile which has arisen despite previous development plans adopting a growth led strategy. Pursuing such a strategy will exacerbate the population imbalance and continue to put pressure on services.
- 6.2 There is uncertainty over the state of the economy post Brexit and the Authority's own employment study suggests that employment would only sustain a much lower housing requirement. There also remains uncertainty over the timing and permanence of jobs that might result from the Celtic Freeport designation.
- 6.3 Notwithstanding that the overall housing requirement is too high, the burden of the housing requirement falling on Pembroke is excessive and contrary to, and will therefore fail to deliver, the Plan's housing strategy. This is in part due to the failure to consider an obvious potential housing site in Pembroke Dock.
- 6.4 The result has been an oversupply of housing in Pembroke. This includes housing allocation sites HSG/095/LDP2/2 and HSG/095/LDP2/5 which are poorly located in terms of access to jobs and services and perform poorly in terms of PPW sequential test. The southern edge of Pembroke is rural compared to the north which is urban and visually and physically almost connected to Pembroke Dock. As such the development of housing sites in the south would not be well related to the settlement, would lead to encroachment into the countryside and the loss of good quality agricultural land. For these reasons LDP 2 is not appropriate and therefore unsound in this regard.