Pembrokeshire County Council
Local Development Plan Review 2
Statement of Common Ground

As agreed between:

Pembrokeshire County Council

and

Welsh Government, Place Division

concerning

Affordable housing provision for the proposed Slade Lane (Maes Slade) Housing Allocation (Policy GN 18: Slade Lane, Haverfordwest - S/HSG/040/LDP2/6) in Policy GN 16: Residential Allocation

October 2026

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1. Purpose of this Statement of Common Ground

1.1 This Statement of Common Ground (SoCG) sets out the latest agreed position of the Local Planning Authority (LPA) and the site promoter Welsh Government, Place Division, with regards to the level of affordable housing provision on the housing allocation site at Slade Lane (Ref: S/HSG/040/LDP2/6). The part of the allocation that Welsh Government intends to submit a planning application for is hereafter referred to as "Maes Slade" (see Appendix 1).

1.2 This SoCG is intended to assist the Local Development Plan (LDP) examination by setting out the agreed background to the proposed allocation and its associated level of affordable housing provision which has been determined through viability assessment. This SoCG demonstrates that both parties are working collaboratively to address and resolve any issues arising from the proposed development and to support the progression of the allocation through the LDP.

2. Site Description

2.1 The Maes Slade part of the allocation ("the Site") extends to approximately 28.36 hectares (ha) and is located to the northwest of Haverfordwest. The majority of the Site is owned by Welsh Government, Place Division, while the remainder of the Site is owned by Codi Group, PCC.

2.2 The majority of the Site comprises open agricultural fields which are currently used for arable crop and grazing. There are rows of mature hedgerows between the agricultural fields and along the majority of the Site boundaries. There is a small area of 'Restored Ancient Woodland' recorded within the southwest corner of the Site at 'Harries Slade', located to the northwest of Thomas Parry Way roundabout.

2.3 There are no recorded wildlife or ecological designations within the Site. The Site is located within Flood Zone 1. Vehicular and pedestrian access to the Site is via Thomas Parry Way to the south.

3. Planning Status

3.1 The majority of the Site is allocated for housing development (ref. HSG/040/00273 and 00274) in the current LDP which is proposed to be retained as a strategic allocation in the emerging LDP (ref. S/HSG/040/LDP2/6) (see Appendix 2) together with some additional land to the northwest, and the inclusion of the school site to assist with the masterplanning of the Site.

3.2 The proposed allocation under Policy GN 18 has already been subject to development (Phase 1) and a separate application for the approval of Reserved Matters (Phase 2):

a) Planning permission was granted in July 2019 (Reference: 18/1040/PA) for the development of 115 dwellings (including 42 affordable homes). Lovell has commenced construction in respect of this permission; and,

b) A planning application for the approval of Reserved Matters in respect of the second phase of development comprising of 103 dwellings (including 52 affordable units) was submitted in August 2024 (Reference: 24/0497/PA).

4. Policy Requirements – matters agreed

4.1 Following the publication of the Deposit 2 Plan (September 2024) and subsequently the Deposit 2 Plan (September 2024 with Focussed Changes edits), Welsh Government, Place Division and Pembrokeshire County Council have been liaising with regards to Policy GN 16.

4.2 This section sets out the matters agreed between Welsh Government, Place Division and Pembrokeshire County Council in respect of Policy GN 16.

Policy GN 16: Matter agreed by parties	
Indicative Affordable Housing Requirement Percentage	The LDP Deposit Plan 2 (September 2024) included an indicative affordable housing provision of 83%. During the Council's Focussed Changes consultation, Lichfields on behalf of Welsh Government, Place Division, submitted representations to highlight that the level of affordable housing provision on the Site was an arithmetic error and was not possible given the number of homes already delivered on the site and remainder to be delivered in the Plan period. The LDP Deposit Plan 2 (September 2024 with Focussed Changes edits) revised Policy GN 16 to reduce the indicative affordable housing level for the Maes Slade allocated site to 50%, as an interim position pending the preparation of a key site viability appraisal for the Maes Slade housing allocation. The full PCC response on this matter following the Focussed Changes consultation is set out in LDP 2 Submission Document SD09.7. LDP 2 Examination Document ED10a includes the Addendum / Update to the 2024 Financial Viabiltiy Report, prepared by Burrows-Hutchinson Ltd in respect of Key Candidate Site Viability Assessments for PCC's LDP 2, in February 2026. The conclusions from this document regarding 'Slade Fields, Haverfordwest' is included in Appendix 3 of this SoCG. Paragraph 3.23 of the Report states *"It is, however, common ground that it should be viable for the development to deliver 30% of the new homes as affordable dwellings".* Appendix 4 of this SoCG includes the table from Appendix B of the February 2026 Addendum which shows the Slade Fields affordable housing provision as 30%. Email correspondence between PCC and Lichfields/Welsh Government on the level of provision is included within Appendix 5. The parties agree that the level of affordable housing provision will be 30% for the Maes Slade component of the Slade Lane allocation in Policy GN 16 (Residential Allocations). This may be subject to further testing at application stage in order to take account of the costs associated with nutrient neutrality mitigation.

5. Agreement

Signed: [redacted]
Name:
For and on behalf of Pembrokeshire County Council
Date:
[redacted] **Signed:**
Name: Simon Coop
For Lichfields on behalf of Welsh Government, Place Division
Date: 22/10/2026

Appendix 1: Maes Slade part of the Slade Lane allocation



0 100m 200m 300m

LICHFIELDS

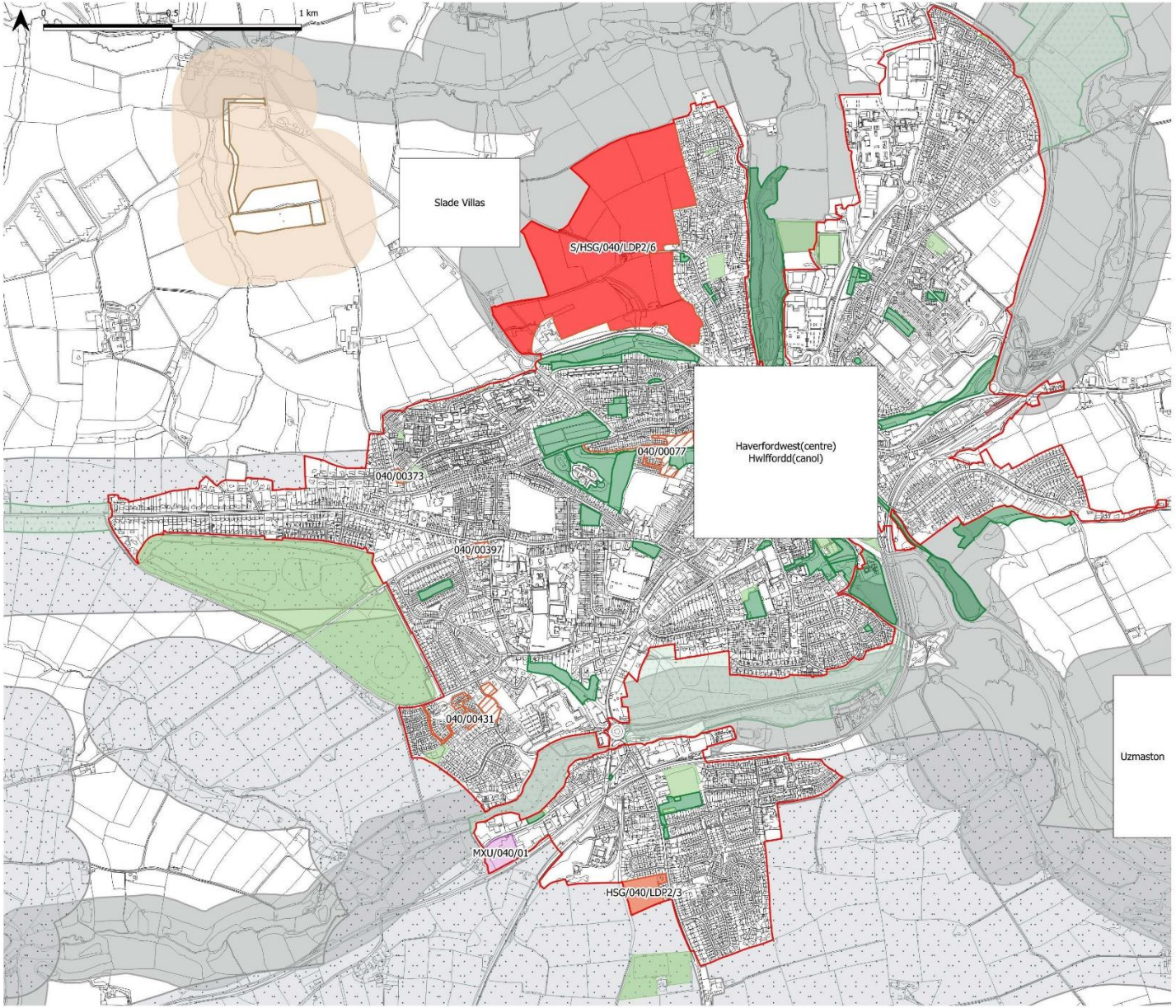
Title	Maes Slade part of Slade Lane allocation
Date	21.10.26
Scale	1:5000 @ A3
Drg. No.	IL67525/01-031

N

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LG/LF67525/01

Appendix 2: Location of LDP2 Policy GN 18 allocation (S/HSG/040/LDP2/6)



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- □ Hawlfraint y Goron [a hawliau cronfa ddata] [blwyddyn gyflenwi] OS [rhif y drwydded] Rhoddir trwyddedi ddirymiadwy, anghyfyngedig a heb freindal i chi i weld y data trwyddedig atddibenion anfasnachol am y cyfnod y mae ar gael. Nichewch gopïo, is-drwyddedu, dosbarthu na gwerthu unrhyw ran o'r data hwn i drydydd partïonmewn unrhyw ffurf.

Appendix 3: Conclusions from the BHL February 2026 Addendum (LDP 2 Examination Document ED10a)

Slade Fields, Haverfordwest

3.18 The major part of this site allocation (referred to in Policies GN 16 and GN 18 of LDP-2) was purchased by Welsh Government in 2023. Pre-application discussions are currently in progress and an outline planning application could be made in the relatively near future; but there remain some uncertainties around the full development capacity of the site, partly due to the uncertainties over the nutrient neutrality issues outlined under the next sub-heading to this Addendum Report.

3.19 BHL was first asked to review a viability assessment prepared by Savills on behalf of Welsh Government in October 2025. Detailed discussions between BHL and Savills have ensued, establishing common ground on a majority of the inputs and assumptions for the site-specific viability assessment.

3.20 The main difference of opinion that remains is over the gross revenue from open market sales that BHL believes should be achievable – Savills' estimate is approximately £1.33 million lower than BHL's – and thus the contribution that the development could make towards community infrastructure and active travel requirements is also lower in Savills' appraisal. Savills have also expressed a reservation about whether an allowance of £1,500 per dwelling for SuDS adoption costs will be sufficient for this site.

3.21 For the avoidance of doubt, the figures highlighted in red at **Appendix B** are based on BHL's FVA. Savills' alternative figures are £3,119/m² for OM Sales and £6,000 per dwelling for s.106.

3.22 The outstanding issues relating to the FVA are unlikely to be resolved until there is clarity on how nutrient neutrality requirements might impact on either the development capacity of the overall site, or on development costs, or both.

3.23 It is, however, common ground that it should be viable for the development to deliver 30% of the new homes as affordable dwellings.

Appendix 4: Addendum to Financial Viability Report, Appendix B prepared by Burrows-Hutchinson Ltd (February 2026)

UPDATED VIABILITY ASSESSMENTS for "KEY SITES" **ADDENDUM to FINANCIAL VIABILITY REPORT - APPENDIX B**

Development Site	Units	NDAc	NtoG	dpa	sqm/ha	AH %	Value Band	OM Sales £/m²	Plot Cost £/m²	Land Value £/net ac	s.106/dwg	Blended Margin
Stranraer Road, Pembroke Dock	59	4.47	91%	13.2	2,642	15.3%	2	£2,906	£1,345	£134,150	£7,547	19.56%
Golden Hill, Pembroke	50	3.55	85%	14.1	3,182	14.0%	3	£2,870	£1,340	£161,972	£4,360	17.33%
St Daniels Hill, Pembroke	147	8.40	69%	17.5	3,586	24.5%	3	£2,986	£1,150	£160,688	£5,150	19.09%
Gibbas Way, Pembroke	86	5.25	74%	16.4	3,296	24.4%	3	£3,171	£1,390	£220,000	£6,062	18.53%
Conway Drive, Steynton	280	19.13	80%	14.6	3,256	15.4%	2	£2,854	£1,300	£141,172	£12,579	19.28%
Myrtle Meadows, Steynton	65	6.99	89%	9.3	2,188	15.4%	2	£3,035	£1,340	£178,750	£14,687	19.28%
Hayston View, Johnston	113	9.88	81%	11.4	2,810	6.2%	1	£2,838	£1,340	£187,170	£14,946	19.98%
Slade Fields, Haverfordwest	551	36.25	52%	15.2	3,004	30.0%	3	*£3,143*	£1,190	£148,966	*£11,660*	18.10%
Pembroke Road, Merlins Bridge	51	4.30	100%	11.9	2,711	21.6%	3	£3,025	£1,365	£232,583	£6,078	17.69%
Tan Ffynnon, Cilgerran A & B	90	7.41	76%	12.1	2,667	17.8%	2	£3,043	£1,365	£222,582	£4,516	19.13%
Clunderwen	68	5.34	80%	12.7	3,316	25.0%	3	£3,033	£1,328	£249,064	£1,997	15.25%

NOTES / COMMENTS :

Each site has been colour-coded in accordance with the Housing Market Area in which it is located (i.e. Band 1, Band 2 or Band 3 - see **Appendix B** to BHL's Financial Viability Report dated July 2024).

The Net Developable Area (NDAc) is shown for each site (in acres), together with the ratio between that Net Area and the Gross Site Area (NtoG). An indicative development density is given for each site, in terms of dwellings per net acre (dpa) and square metres per net hectare (sqm/ha).

The proportion of on-site affordable housing that is considered to be "viable" for each site is shown under the heading "AH%".

In cases where the average open market sales values (in £ psm) and the plot cost rate appear to exceed the norm for that Housing Market Area and/or site typology, this generally reflects a higher proportion of single storey homes in the proposed dwelling mix.

In cases where the Land Value shown above is lower than the Benchmark Land Values used for the 2024 High-Level Countywide Viability Assessments, this typically reflects a higher level of "abnormal" site costs for the site concerned. In all cases, it is considered that the land value shown above should be sufficient to encourage the landowner to sell for the proposed use.

Similarly, the Blended Margin for each site is considered to provide an adequate profit margin for the developer of each site.

Appendix 5: Email correspondence between PCC and Lichfields/Welsh Government on level of affordable housing provision for the Slade Lane allocation

From:	George Williams
To:	Dunne, Martina
Cc:	Lavender, Harriet; Smith, Bob; Nettleship, Tom; Whitby, Lucy; Clements, Laura; Hirst, Sarah; Simon Coop; Sarah Goy; Katy McMullen; Andrew Burrows
Bcc:	67525_02 SLADE LANE _ PLANNING Emails
Subject:	RE: Lichfields -Slade Lane - Draft points of Common Ground - Pembrokeshire Local Development Plan 2 Examination [LICH-DMS.FID764265]
Date:	16 October 2026 14:26:19
Attachments:	image001.png image003.png image004.png image006.png

Dear Martina,

Thank you for your email. On that basis, we have updated the SoCG and propose that this email correspondence is appended to it, and that the parties then sign that document. We will send across a copy with the correspondence for your review.

To confirm, our client also agrees with the proposed amendment to Policy GN3 (Infrastructure and New Development) below.

Finally, the email and table below suggests that Maes Slade would deliver homes in 2027, whereas we anticipate the first homes in Maes Slade would be delivered in 2030. This takes into account the timeframe for the submission of an outline application, reserved matters application/s and access/infrastructure provision.

Kind regards,

George

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Nathaniel Lichfield & Partners Limited (trading as "Lichfields") is registered in England, no. 2778116, registered office at The Minster Building, 21 Mincing Lane, London EC3R 7AG.

From: Dunne, Martina <Martina.Dunne@pembrokeshire.gov.uk>
Sent: 15 October 2026 15:01
To: George Williams <george.williams@lichfields.uk>
Cc: Lavender, Harriet <harriet.lavender@pembrokeshire.gov.uk>; Smith, Bob <Bob.Smith@pembrokeshire.gov.uk>; Nettleship, Tom <Tom.Nettleship@pembrokeshire.gov.uk>; Whitby, Lucy <Lucy.Whitby@pembrokeshire.gov.uk>; Clements, Laura <Laura.Clements@pembrokeshire.gov.uk>; Hirst, Sarah <Sarah.Hirst@pembrokeshire.gov.uk>; Simon Coop <simon.coop@lichfields.uk>; Sarah Goy <sarah.goy@lichfields.uk>; Katy McMullen <katy.mcmullen@lichfields.uk>; Andrew Burrows <andrew.burrows@burrows-hutchinson.com>
Subject: FW: Lichfields -Slade Lane - Draft points of Common Ground - Pembrokeshire Local Development Plan 2 Examination [LICH-DMS.FID764265]

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Dear George

Thank you for your email below.

The Financial Viability Report prepared by Burrow-Hutchinson Ltd (leading for the Council) in February 2026 (copy of correspondence with Savills attached) which is published on the Council's Examination website – (see point 3 of my email below for a weblink), relied upon a delivery profile year by year with some of development within Plan period and some beyond (referred to as LDP 3 in your response). The Council needed to profile this for delivery within the Local Development Plan period and beyond. Andrew Burrows' advice at the time (relying on that work undertaken with Savills) was that: An assumption behind the Slade Fields FVA is that market homes will be completed/occupied at a rate of 2.5 dwellings per month, starting in March 2028; and affordable units (of which there are fewer, of course) at 2 dwellings per month.

The development cashflow thus shows that 63 open market homes and all 50 affordable homes in Phase 1 of the development would be occupied by March 2030, with the remaining 57 open market homes in that Phase sold and occupied by Feb 2032; when Phase 2 completions begin.

By the time we get to the end of 2033, the cashflow shows the further completion of 55 open market and 44 affordable homes; making a total contribution from the WG development of about 270 dwellings.

To that I guess you would add what you expect the Pobl site(s) to deliver in the same period.

The rest of the WG development (some 280 units) therefore comes after 2033 in the cashflow/sales scenario agreed with Savills.

Numerous caveats, of course. The cashflow for the WG site assumes that a physical start on site is made in June 2027. That ought to be achievable, unless there are headwinds (like nutrient neutrality) that slow everything down. On the other side of the coin, Savills and I are agreed that 30 open market sales a year is a realistic estimate in current market conditions, which are not particularly strong. Between 2021 and 2023 we would have been assuming a faster rate (between 40 – 50). Although the affordable homes in each will be occupied before the market homes are all sold (a normal section 106 requirement), they rely on the (timely) sale of some market homes to fund/subsidise their construction costs; and so cannot be built entirely "up front", unless grant funding is available. There might be a special case here, to enable the delivery of more affordable homes to be accelerated, but that wouldn't apply to any normal s.106 site.

This advice is what is reflected in Table B below.

As the reference to 35% within the Plan period is not considered by Lichfields to be an appropriate reflection of what were the agreed outcomes of the viability assessment in February 2026, and in the interests of progressing matters, the Council is willing to recommend at Examination a flat requirement for 30% affordable housing delivery on land at 'Maes Slade' in Welsh Government's control during the Plan period. Consequently, with reference to the provision of 25% affordable housing beyond the Plan period (LDP3) as set out in Table B below the Council will also recommend that this is increased from 25% to 30%.

In terms of nutrient neutrality matters I have already advised of the Council's position on this in point 6 of my email below. The Council has nothing further to add at this point.

Thanks Martina

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From: George Williams <george.williams@lichfields.uk>
Sent: 14 October 2026 10:55
To: Dunne, Martina <Martina.Dunne@pembrokeshire.gov.uk>
Cc: Smith, Bob <Bob.Smith@pembrokeshire.gov.uk>; Lavender, Harriet <harriet.lavender@pembrokeshire.gov.uk>; Whitby, Lucy <Lucy.Whitby@pembrokeshire.gov.uk>; Nettleship, Tom <Tom.Nettleship@pembrokeshire.gov.uk>; Hirst, Sarah <Sarah.Hirst@pembrokeshire.gov.uk>; Clements, Laura <Laura.Clements@pembrokeshire.gov.uk>; Simon Coop <simon.coop@lichfields.uk>; Sarah Goy <sarah.goy@lichfields.uk>; Katy McMullen <katy.mcmullen@lichfields.uk>
Subject: RE: Lichfields -Slade Lane - Draft points of Common Ground - Pembrokeshire Local Development Plan 2 Examination [LICH-DMS.FID764265]

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

Dear Martina,

Thank you for setting out the Council's position below.

We have discussed this with our client and wider team and would like to express our concern in the shift in approach and would like to raise the following queries/points:

1. The meeting and subsequent emails between Burrow-Hutchinson Ltd (leading for the Council) and Savills (on behalf of Welsh Government) discussed the affordable provision for the allocation. However, there is no reference to a provision of 35% within the email correspondence. Furthermore, Savills state that the negotiations did not conclude with the publication of the updated Financial Viability Report (February 2026). Rather, that is a report based on work undertaken by Burrows-Hutchinson Ltd.
2. The FVR (Feb 2026) references 30% at paragraph 3.23 and within Appendix B for the 'Slade Fields' allocation. There is no reference to the sub-phases of the allocation, or a 35% target within the FVR.
3. It should not fall on the developer of Maes Slade to make up for any under-delivery of affordable housing in earlier phases within the wider allocation. We would like to reiterate the point we made in the draft Statement of Common Ground where we have observed an inconsistency in the level of affordable housing targets for various allocations against the housing band and number of homes in draft Policy GN 20 (Local Needs Affordable Housing).
4. Could the Council confirm the publication date for the full viability evidence? It is critical to the examination that this evidence fully reflects the cost implications of the required nutrient mitigation.
5. We note the differing affordable housing requirements between LDP2 and LDP3 in Table B below. Could the Council please set out the specific evidence supporting this?
6. Further to point five, we cannot envisage how two separate requirements for affordable housing could be applied to two elements of the same outline permission (i.e. a different percentage for LDP2 and LDP3). The planning strategy is to submit a single application for the entire development and we do not know why the Council has assumed that an initial application would be submitted just for the first 112 homes (the zero point development).

To confirm, we would like to restate our client's position is a maximum of 30% affordable housing provision for the Maes Slade component of the strategic housing allocation.

As you are aware, Lichfields is preparing a Matters Statement for Session 8 of the examination hearing. We await your response on this matter before finalising the statement. We do not want to object to any element of the policy in respect of Maes Slade and recognise its strategic importance to the LDP but we are concerned that an inconsistent approach appears to be pursued to this site when compared to others.

Kind regards,

George

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From: Dunne, Martina <Martina.Dunne@pembrokeshire.gov.uk>
Sent: 08 October 2026 13:11
To: George Williams <george.williams@lichfields.uk>
Cc: Smith, Bob <Bob.Smith@pembrokeshire.gov.uk>; Lavender, Harriet <harriet.lavender@pembrokeshire.gov.uk>; Whitby, Lucy <Lucy.Whitby@pembrokeshire.gov.uk>; Nettleship, Tom <Tom.Nettleship@pembrokeshire.gov.uk>; Hirst, Sarah <Sarah.Hirst@pembrokeshire.gov.uk>; Clements, Laura <Laura.Clements@pembrokeshire.gov.uk>
Subject: Lichfields -Slade Lane - Draft points of Common Ground - Pembrokeshire Local Development Plan 2 Examination

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Dear George

Thank you for our meeting yesterday afternoon with us. I hope it was helpful to you.

Following that meeting I propose that we agree the following points of common ground by email exchange. The Council can attach the email exchange to its Hearing Statement which deals with Slade Lane which would be an Appendix to Hearing Session 9 as an agreed position in relation to the Slade Lane Allocation.

We also discussed the possibility of updating the formal Draft Statement of Common Ground you kindly prepared. I will leave this with you to discuss with colleagues. We will need to submit our final Hearing Statements by the 23rd of October 2026.

It is of course for Lichfield's to decide if it wishes to submit a separate Hearing Statement to Session 9 to address any matters as well.

I also promised that I would advise in a later email on the components of the housing land supply profiled in the Cabinet Report of the 7th of September 2026 which deals with nutrient mitigation.
This will follow.

I look forward to hearing from you.

Thanks Martina

Development Plans / Cynlluniau Datblygu
Pembrokeshire County Council / Cyngor Sir Penfro
01437 770089

Draft Points of Common Ground.

1. The extent of the housing allocation at Slade Lane included in the Pembrokeshire Local Development Plan 2 Policy GN 16 Residential Allocations (ref S/HSG/040/LDP2/3) is greater than the extent of land being delivered by Welsh Government (which forms part of the allocation). The extent of the different land being delivered by various parties is shown on the attached map.

2. For ease of reference and to distinguish the land being delivered by WG from other land expected to be delivered by different parties in the Slade Lane allocation the extent of land WG is delivering can be referred to as 'Maes Slade.'
3. The provisions included in Policy GN 16 Residential Allocations of the Local Development Plan (including Focussed

Changes) (SD14) Deposit Plan - Focussed Changes (the Plan submitted for Examination) required updating in response to Inspectors' Initial Questions (ED01) Inspectors Initial Letter to LPA 02.12.25. Negotiations and agreement reached between the Council (A Burrows leading) and Savills working on behalf of Lichfields concluded with the publication of the Financial Viability Report update Feb 26.

(ED10a) Financial Viability Report Addendum Feb 2026

(ED10b) Appendix A Viability Guidance Note for Wales

(ED10c) Appendix B Updated Key Site FVAs

a. Table A shows the figures included in Focussed Changes to the Deposit Local Development Plan for information.

Table A Focussed Changes	**Total**	**% Aff**	**Aff units**		**Delivery MT/LT**		
Phase 1(Pobl)	**115**	**48%**	**55**		**24 to 29**	**MT**	
Phase 2 (Pobl)	**103**	**52%**	**54**		**29 to 33**	**LT**	
Phase 3	**112**	**50%**	**56**				
Total (summary)	**330**	**50%**	**165**				
Beyond	**680**						

Snip below is from the SD14 Local Development Plan (including Focussed Changes)

GN 16 Residential Allocations

The following sites are allocated for residential development:

LDP2 Reference	Site Name	Settlement	Expected Minimum Units In Plan Period	Indicative Affordable Housing Requirement Percentage (%)	Indicative Affordable Housing Requirement Unit Number	Delivery timescale Year 1-5 (ST) Year 6-10 (MT) Year 11-16 (LT)	Expected Units Beyond The Plan Period	Area Ha	Potential For Self Build Indicated By Site Promoter
HSG/040/LDP2/1	Former Community Education Centre, Dew Street	Haverfordwest	22	100%	22	MT	0	0.63	No
S/HSG/040/LDP2/6 (summary)	Slade Lane (see policy GN 18)	Haverfordwest	330	50%	165	MT/LT	680	38.88	
S/HSG/040/LDP2/6 (phase 1)			115	48%	55				No
S/HSG/040/LDP2/6 (phase 2)			103	52%	54				Not Known
S/HSG/040/LDP2/6 (phase 3)			112	50%	56				Yes

b. Table B shows the figures agreed following A Burrows meeting with Savills and reflected in the FVR Feb 2026 (link above – Appendix B) solely in relation to land being delivered by WG.

Table B	**AB WG Phases**	**Total**	**OM**	**Aff**	**% Affordable**
Start 2027 30 per annum build rate	**WG Phase 1 to March 2030**	**113**	**63**	**50**	**44%**
	WG Phase 2 to Feb 2032	**57**	**57**		**0%**
	WG Phase 3 end of 2033	**99**	**55**	**44**	**44%**
	In Plan Total	**269**	**175**	**94**	**35%**
	Beyond Plan	**282**	**211**	**71**	**25%**
	Overall WG Total	**551**	**386**	**165**	**30%**

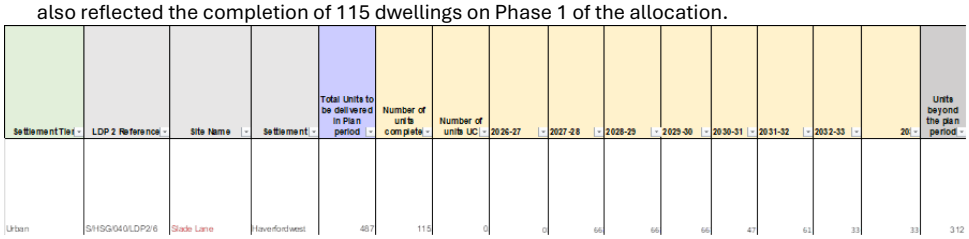
c. Table C shows an updated breakdown of the allocation's provisions against each delivery organisation/company – set out in Phases (as at February 2026). An updated summary row and breakdown for each Phase will need to be inserted in Local Development Plan 2 Policy GN 16 Residential Allocations as a Matters Arising Change once agreed.

Table C Post February 2026	**Total Residential Units**	**Affordable Housing %**	**Affordable Housing Number**	**Change From Table A**	**Total Houses Change**	**Affordable Housing % Change**	**Change in Affordable Housing Numbers**
Phase 1 (Pobl)	**115***	**36.5%**	**42**	**Change**	**0**	**-11%**	**-13**
Phase 2 (Pobl)	**103**	**56%**	**58**	**Change**	**0**	**4%**	**4**
Phase 3 (WG)	**269**	**35%**	**94**	**Change**	**157**	**-15%**	**38**
Total	**487**	**40%**	**194**	**Change**	**157**	**-10%**	**29**

Beyond WG	**282**			**Change**	**-398**		
Beyond Hillwest Ltd	**30**						
Beyond Total	**312**			**Change**	**-368**		

*of which 46 Open Market completed April 25

4. Table C uses an updated base date of April 2025 as requested by the PEDW Inspectors at the time in the Initial Questions. The Council has subsequently been asked to provide an updated Trajectory for the Housing Land Supply base date April 2026. The Council was not required to update Policy GN 16 Residential Allocations. Below is an extract from ED 34 Appendix 2 Local Development Plan 2 Housing Components & Trajectory Update Sept 26 (using a base date of April 2025) showing the profiling of development on the allocation site overall that was submitted. It reflected the CNRP anticipated production by April 2027 and the potential availability of the Pembrokeshire Nutrient Credit Scheme also by April 2027. It also reflected the completion of 115 dwellings on Phase 1 of the allocation.



Settlement Tier	LDP 2 Reference	Site Name	Settlement	Total Units to be delivered in Plan period	Number of units complete	Number of units UC	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33	20(	Units beyond the plan period
Urban	S/HSG/040/LDP2/6	Slade Lane	Haverfordwest	487	115	0	0	66	66	66	47	61	33	33	312

To assist a breakdown by year per delivery organisation/developer is set out in Table D1 below.

Table D1 Trajectory Update April 26 breakdown	**Complete**	**2026/2027**	**2027/28**	**2028/29**	**2029/30**	**2030/31**	**2031/32**	**2032/33**	**2033**	**Totals**
Phase 1 complete	**115**									**115**
Phase 2			**37**	**37**	**29**					**103**
Phase 3 a (WG = Phase 1)			**29**	**29**	**37**	**18**				**113**
Phase 3 b (WG = Phase 2)						**29**	**28**			**57**
Phase 3 c (WG = Phase 3)							**33**	**33**	**33**	**99**
Beyond Plan										**312**
Totals	**115**	**0**	**66**	**66**	**66**	**47**	**61**	**33**	**33**	**799**

A summary table for April 26 is also provided below – Table D2 which matches the phasing proposed in Table C above.

Table D2 April 26 Base Date (Trajectory update)			
Phase 1 (Pobl)*	**115**	**36.5%**	**42**
Phase 2 (Pobl)	**103**	**56%**	**58**
Phase 3 (WG)	**269**	**35%**	**94**
Total	**487**	**40%**	**194**
Beyond WG	**282**		
Beyond Hillwest Ltd	**30**		
Beyond Total	**312**		

*115 completed

5. Earlier this week(5th of October 2026) the Council has also been asked to provide more information by the Inspector in terms of the Trajectory provided ED34. '*It will be necessary to establish the latest situation for delivering each allocation. Therefore, I will ask the Council to write out to landowners to clarify the latest position for each site, and to feed that information back into the final column (*of the relevant table in the Trajectory*) so that the table contains up to date information for each allocation. A standard letter/email seeking details should be prepared, asking questions about land acquisition, pre-application discussions, site survey work, anticipated application submission and/or discharge of conditions and commencement works here permission(s) have been granted; that is, the information contained in the Development Plans Manual.'* The Council will liaise with Lichfields (and other site promoters) to supply this information. There has not been a specific deadline set for this work to be completed by the Inspector at this point.

6. The Council acknowledges that the provisions contained in the publication (ED10a) Financial Viability Report Addendum Feb 2026 for 'Maes Slade' do not fully reflect the possible costs of nutrient mitigation: para *3.22 The outstanding issues relating to the FVA are unlikely to be resolved until there is clarity on how nutrient neutrality requirements might impact on either the development capacity of the overall site, or on development costs, or both. 3.23 It is, however, common ground that it should be viable for the development to deliver 30% of the new homes as affordable dwellings. Policy GN 16 Residential Allocations as proposed for change through Matters Arising Changes may not reflect the cost implications for fully addressing nutrient mitigation requirements.*

The Council proposes in its Statement for Hearing Session 3, which will deal with Water Quality, to update Policy GN 3 Infrastructure and New Development to address the uncertainty around nutrient mitigation for Maes Slade land promoters (and indeed for other site promoters) where this issue also arises.

Extract from text in the Hearing Statement 3 Water Quality

It is difficult to specify exact mitigation costs because:

- nutrient credit markets and bespoke mitigation methods are still developing
- mitigation supply may vary by catchment
- national guidance and case law continue to evolve
- NRW's Catchment Nutrient Recovery Plans are being drafted and will be updated. They are inherently dependant on monitoring new evidence emerging on the condition of SACs in relation to nutrient pollution.

Local Development Plan 2 will need to handle uncertain nutrient¯mitigation costs through flexible, criteria¯based policies that acknowledge costs may vary over time while still requiring development to demonstrate neutrality or satisfactory nutrient mitigation at application stage.

Uncertainty needs to be acknowledged in policy because although the policies of the Plan are justified by evidence available at this point in time, they must also reflect local circumstances. In this case the local circumstances are that Pembrokeshire is at the beginning of a journey to resolve issues of nutrient pollution in two SACs in the County. Flexibility is justified to recognise cost variability without undermining the plan's strategy.

The suggestion is to insert the text below at the end of the main policy wording in Policy GN 3 Infrastructure and New Development. The policy needs to acknowledge cost uncertainty regarding nutrient mitigation whilst still requiring that there is no adverse effect on the integrity of SACs.

Policy GN 3 already advises: **The viability of a development will be a key consideration when securing planning obligations and dispensation may be allowed in certain circumstances where there is clear evidence that the development would not be viable.**

It is proposed to add this text to the end of the bold Policy wording:

Development that would result in additional nutrient loading to designated nutrient sensitive water bodies (described in SP12a) must demonstrate there is no adverse effect on the integrity of the SAC through proposed mitigation measures to be agreed with the Council. The Council recognises that the cost of mitigation measures may vary over the plan period due to changes in market availability of nutrient credits, the cost of bespoke mitigation proposals, and changes in regulatory requirements. Mitigation may be delivered through on-site or off-site measures, strategic mitigation schemes, or financial contributions. Where an applicant wishes to demonstrate that the development proposals cannot achieve the Plan's requirements under Policy GN 3 Infrastructure and New Development, alongside ensuring the proposal does not result in adverse effects on site integrity, applicants must provide up-to-date evidence of mitigation costs, using the most current methodology for nutrient mitigation endorsed by Natural Resources Wales.

It is also proposed to add the text below acknowledging uncertainty by adding a new paragraph at the end of reasoned justification:
'The Council recognises that nutrient-mitigation markets are emerging and that costs may fluctuate. The plan therefore adopts a flexible approach, allowing applicants to use the most up-to-date cost evidence rather than relying on fixed tariff assumptions where such mitigation measures are not available at the time of application. This approach ensures the plan remains deliverable while maintaining compliance with the Habitats Regulations.'

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