



*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](mailto: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](mailto: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)**

<i>Enw Name</i>	John Greggain	Mr Geraint John
<i>Teitl swydd (lle y bo'n berthnasol) Job title (where relevant)</i>		Planning Consultant
<i>Sefydliad (lle y bo'n berthnasol) Organisation (where relevant)</i>	L. Greggain & Co Ltd	GJP
<i>Cyfeiriad Address</i>		
<i>Rhif ffôn Telephone no</i>		
<i>E-bost Email address</i>		
<i>Llofnodwyd (gallwch teipio) Signed (can be typed)</i>		
<i>Dyddiad / Date</i>	16/12/2024	



**RHAN B: Eich sylw**

**PART B: Your representation**

Eich enw / sefydliad Your name / organisation	GJP
--	-----

**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)	S/HSG/086/LDP2/3
Rhif(au) paragraff y Cynllun Datblygu Lleol neu adran LDP paragraph or section number(s)	Refer to Submission
Cyfeiriad(au) Map Cynigion y Cynllun Datblygu Lleol LDP Proposals Map reference(s)	Refer to Submission
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.	

**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.	
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.	Y
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

*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/profion 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.

Please refer to submitted letter

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

Y

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.*

Y

I want to speak at a public hearing.

*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').



Site allocation - S/HSG/086/LDP2/3

**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.

*Rwy'n dymuno cael fy nghlywed yn Saesneg.*

I wish to be heard in English.

Y



## Nodiadau cyfarwyddyd

### Guidance notes

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

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

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

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

Os ydych yn gwrthwynebu, dylech ddweud pam rydych yn credu bod y Cynllun yn ansad a sut y dylid newid y Cynllun er mwyn ei wneud yn gadarn.

Lle cynigiwch newid i'r Cynllun, byddai o gymorth esbonio pa brawf/brofion cadernid y credwch y mae'r Cynllun yn eu methu. Os yw eich sylw yn perthyn i'r ffordd gafodd y Cynllun ei baratoi neu'r ffordd yr ymgynghorwyd arno, mae'n debygol y bydd eich sylwadau yn perthyn i 'ofynion gweithdrefnol'.

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

Os ydych yn ceisio am fwy nag un newid i'r

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

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

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

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

If you are making an objection, you should say why you think the Plan is unsound and how the Plan should be changed to make it sound.

Where you propose a change to the Plan it would be helpful to make clear which test(s) of soundness you believe the Plan fails. If your comment relates to the way in which the Plan has been prepared or consulted on, it is likely that your comments will relate to 'procedural requirements'.

Failing to identify a test will not mean that your comments will not be considered, providing it relates to the Plan or its supporting documents. You should include all your comments on the form, using accompanying documents and supporting evidence where necessary.



*Cynllun, nid yw bob tro yn angenrheidiol i lenwi ffurflenni ar wahân ar gyfer pob darn o'ch sylw. Fodd bynnag, gallai fod yn ddefnyddiol o bosibl i ddefnyddio dwy ffurflen ar wahân os ydych yn dymuno siarad mewn gwrandawriad am rai gwrthwynebiadau ond nid rhai eraill.*

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

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

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



16th December 2024

**fao.** The Development Plans Team

**address.** County Hall, Freeman's Way,  
Haverfordwest,  
Pembrokeshire.  
SA61 1TP

Dear Sir / Madam,

**Site Reference:** S/HSG/086/LDP2/3

**Address:** South of Conway Drive, Castle Pill Road, Steynton

**Proposal:** Proposed Residential Strategic Allocation to deliver a minimum of 117no. units in the Plan period, with a further 163no. units to be delivered beyond the Plan period.

## Preface

We write on behalf of our client, L. Greggain and Co Ltd. (the owner of the land / development at Beaconing Field to the north of the proposed allocation), to object to the proposed Residential Strategic Allocation identified in the Deposit Plan at the above site (ref. S/HSG/086/LDP2/3). This objection is raised primarily in regard to (1) highways/access, and (2) infrastructure capacity issues.

By association, the site's / allocation's overall suitability and deliverability in the LDP2 is questioned. Accordingly, and to express these concerns in more detail, several issues relating to the proposed development of the site have been set out below that form the basis of this objection – which concern the following:

- Highways and access capacity issues to service the strategic site; and
- Lack of supporting infrastructure services to support the development of the site.

The above principal areas of concern are set out in more detail below.

## Highways and Access

It is considered that the proposed strategic allocation is constrained for 2no. primary highways/access issues, which undermine the suitability and deliverability of the proposed residential development at the site. These are identified below:

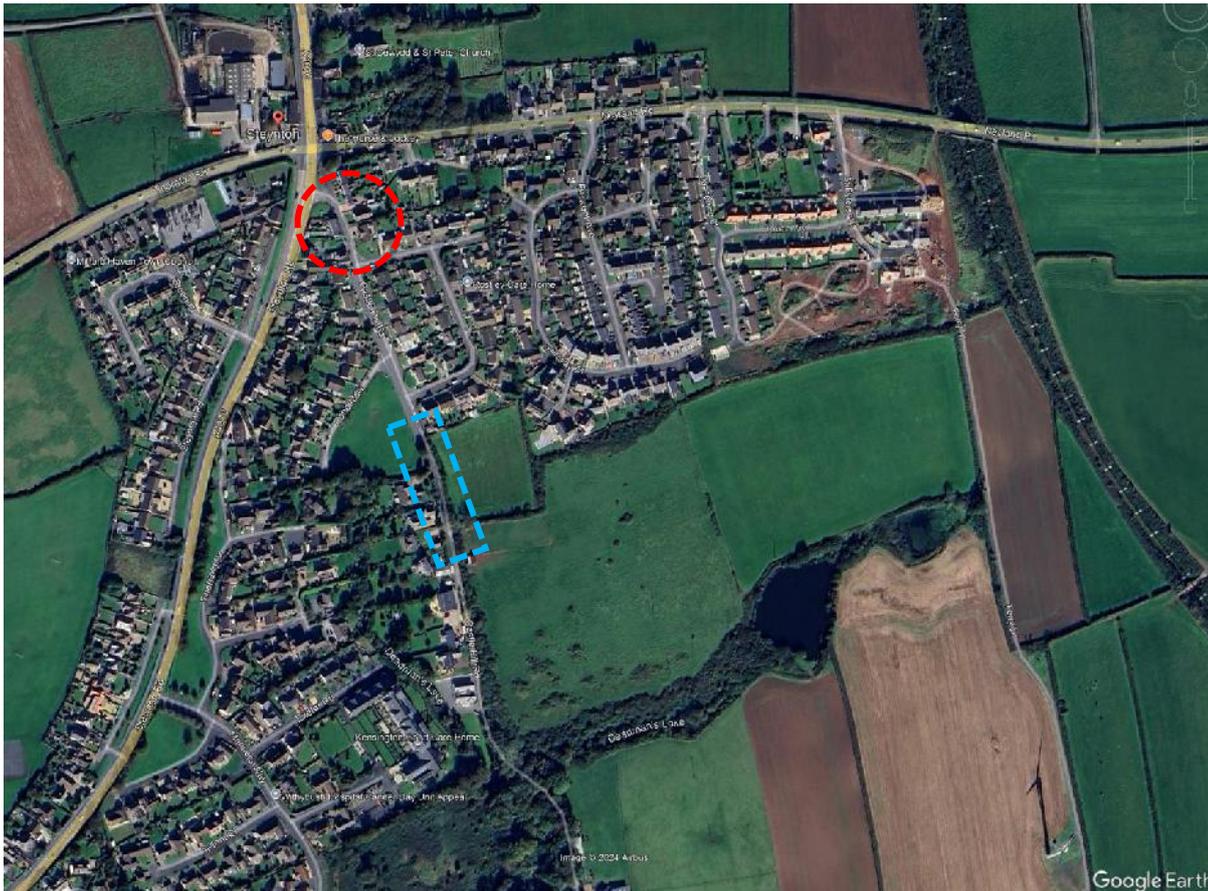
1. Site entrance location to the west of the site; and
2. Principal access into the site from the north through the existing development.

These issues are set out in detail turn overleaf.

## 1. Site Entrance Location to the West

It is considered that the proposed access into the site from the west (via Castle Pill Road) is heavily and significantly constrained. Access to / from the proposed site is not suitable in highways terms – in that it will bring about highway safety concerns, as well as biodiversity and green infrastructure significant impacts, and by association, planning policy failings.

Firstly, it is considered that the western access point cannot accommodate the proposed development, given that there is an existing 'pinch point' at the northern end of Castle Pill Road (circled appreciably in red on the map below). Streetview images showing the narrowness and wholly substandard geometry of the road here are provided below.



Entrance to Castle Pill Road – poor geometry and narrow width



*Castle Pill Road – Adjacent to Existing Residential Properties : width restricted by built form to back of roadside and on street car parking*

As illustrated in the street view above, the road is narrow and poorly designed in its current form, and is even further constrained by existing car parking along this road. The residential properties that abut the highway constrain the existing roadway, and limit / prohibit any potential for improvement.

Given the inherent narrow width of Castle Pill Road, and the need to upgrade to suitable standards to accommodate appropriate vehicular widths, pedestrian and cycle access, it is considered that it is fundamentally constrained to accommodate the proposed strategic allocation. Accordingly, and by association, the suitability of the western access point is undermined and significantly questioned. It has been historically and consistently held that the capacity of Castle Pill Road cannot accommodate any additional flows.

Moreover, as shown in the map above (blue rectangle), Castle Pill Road again narrows prior to the point of access, whereby the current width only allows for 1no. vehicle to pass at any given time. This at its southern is shown on the street view below:



*Castle Pill Road – Top of Red Line Boundary*



*Castle Pill Road – a rural lane*

It is also clear that significant hedgerow and tree removal would be needed to facilitate the necessary highway and pedestrian widths to meet adoptable standards. Such removal is required in order to provide a suitable access in this location – the offset red line in the site layout plan to the western side of Castle Pill Road confirms this. It is considered that approximately 80m linear of hedgerow would need to be removed to facilitate the widening of the road in this location. This is of course contrary to national green infrastructure and biodiversity policy provisions (PP12 and Future Wales), given that the development is seeking to prioritise vehicular access over green infrastructure and biodiversity.

It is also considered that this would bring about significant landscape and visual impacts, given the inherent countryside characteristics that Castle Pill Road currently boasts along this section adjacent to the site's proposed entrance. The proposal would therefore significantly change the character of the area as a result of the extent of works needed to facilitate the western point of access into the site. This is further illustrated by the street view image below, which shows the rural character and appearance of Castle Pill Road in the direction of travelling north.



*Castle Pill Road – Proposed Western Access*



The above image also shows the location of the proposed western access point in its current form, which again, illustrates its unsuitability in terms of highway safety and green infrastructure/biodiversity.

It is known that the parcel north of the strategic allocation is also allocated for residential development in the LDP2 (site ref. HSG/086/LDP2/2 – East of Castle Pill Road, Steynton). This is expected to deliver a minimum of 23no. homes in the Plan period. This intended allocation only exacerbates the position that Castle Pill Road is not suitable to accommodate the proposed strategic allocation, and is fundamentally flawed, as a result, as a point of access into the development.

Overall, it is considered that the western entrance access point is not suitable to serve the proposed development, on both highway safety and green infrastructure / biodiversity grounds, and should therefore be ruled out accordingly. It is considered that it's 'failings' as a suitable access point has been acknowledged by the site promoters, as it has not been designated as the sole / principal access into the site - rather the development seeks to provide a principal access point from the development to the north.

## 2. Northern Principal Access into Site

The strategic allocation seeks to utilise a proposed northern access point that would connect to the existing development at Beaconing Field – which is subject to planning permission approval ref. 18/0503/PA, and has been / is being built out accordingly. An extract overlay of the two sites is provided overleaf:



*Overlay of proposed strategic allocation and Beaconing Fields*

As identified in the extracts above, there is no existing connection point within the Beaconing Fields development that connects to the principal access shown within the strategic allocation. Where it is proposed to connect to the existing development, in order to facilitate an adoptable highway, it would necessitate the removal of at least one / likely two properties within the Beaconing Fields development. Accordingly, no such provision is made here to connect to the proposed principal connection point. Moreover, the specification of the roads would not be suitable to accommodate the level of vehicular movements in this location, given that the plots, which would need to be removed, are served by a private drive only. There is also no direct highway route to this location through the Beaconing Fields development.

As shown on the plan above, there is also an existing Local Area of Play (LAP) at the south-western end of the site, which would prohibit any connection point in this location. Moreover, the road that leads up to this point (Beaconing Drive) is not up to suitable highway standards to accommodate the quantum of development within the strategic allocation.

On this basis, it is considered that that the proposed principal access is fundamentally constrained, in that there are no existing connection points to utilise to access the development from the north accordingly – based on its current layout. As such, the route, as per its current proposal, cannot be implemented, and therefore, undermines and prevents the overall deliverability of the strategic allocation.

As identified on the plan below, provision was made for a future connection point towards the south of the development, however, this does not marry up to the location of the principal access shown on the proposed strategic allocation. This route is of higher specification, and represents a more direct arrangement. Notwithstanding this, the allocation on its current basis does not seek to utilise this connection. Irrespective of being planned as part of the Beaconsing Fields development, it is by no means certain that the specification of this potential access is suitable and adequate for the development proposed. The access is of lower specification than the 'through road' to the eastern side connection through the site to Ferry Lane – which has footways and verges on either side. Landownership constraints also exist to a point of access at their location / position.



Approved Masterplan – Beaconsing Fields

### Infrastructure Capacity

It is considered that there are significant infrastructure capacity issues associated with the proposed quantum of development within the strategic allocation, which would bring about considerable deliverability issues, and therefore, undermine its suitability as an allocation.

Firstly, as established by our client through their involvement in other residential developments in Steynton, there is limited capacity in the local foul system to accommodate further residential development. It is considered that significant network improvements would be required in order to service, and by association, facilitate, a development of this scale in this location. This of course raises both viability and deliverability concerns, given the significant expense that would be expected for any developer to incur in order to deliver the site. Accordingly, this undermines the credibility of the proposed strategic allocation, specifically in relation to its ability to yield its identified minimum quantum of housing (117no). in the Plan period. No planned improvements are in place to accommodate the development, whilst existing allocated and approved schemes are also subject to the same constraints and limitations.



Moreover, any offsite connections for foul disposal will need to run through third-party land, in order to connect to the existing points in the system. No arrangements are in place for such connections. This only further undermines the deliverability of the site, and its overall suitability as a strategic allocation in the Plan.

Secondly, and again as established by our client through other similar residential developments in Steynton, there is limited capacity for Western Power to service any future residential development. Accordingly, it is the case that, if power cannot be guaranteed for existing sites that benefit from planning permission, then it follows that this undermines the availability of the site, and in turn, its overall deliverability within the Plan.

Overall, it is considered that there are serious concerns regarding the deliverability of the site, in light of the existing infrastructure capacity issues that exist within Steynton. As outlined above, this undermines the suitability and deliverability of the site, in order to deliver its strategic allocation within the Plan period and beyond.

## Summary

In summary, our client considers the proposed strategic allocation to be fundamentally flawed, and as a result, unsuitable for development in the Plan. As identified in this letter, there are serious concerns relating to the following:

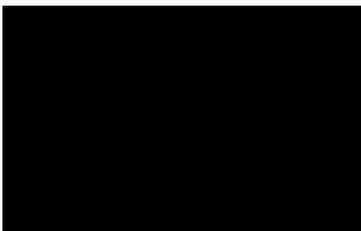
- Highway capacity and safety;
- Green infrastructure/biodiversity; and
- Infrastructure capacity.

All of these factors combine to undermine the suitability, availability and deliverability of the site, and its soundness.

Accordingly, the site fails the Test of Soundness due to its lack of suitability, availability, and deliverability, and should not be allocated as a strategic residential allocation in the LDP2 accordingly.

We trust that the comments made within this letter will be duly considered as part of the assessment of the site within the LDP2 process.

Yours sincerely,



**Geraint John**

Director

Geraint John Planning Ltd.



## Nettleship, Tom

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**From:** [REDACTED]  
**Sent:** 16 December 2024 18:17  
**To:** LDP - For Enquiries  
**Cc:** Geraint John; Kieron Lediard; Oliver Stone  
**Subject:** Deposit Plan - Objection to South of Conway Drive, Castle Pill Road, Steynton (ref. S/HSG/086/LDP2/3)  
**Attachments:** GJP - Letter of Objection - South of Conway Drive, Castle Pill Road, Steynton.pdf; 240618 Deposit Plan 2 Comments Form.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.**

Dear Sir / Madam,

Please find attached on behalf of our client, L. Greggain and Co Ltd., an objection to the proposed strategic allocation at the above site / reference in the LDP2.

Our client's reasoning for objection is set out in full in the attached statement. Please also find attached a completed Comments Form.

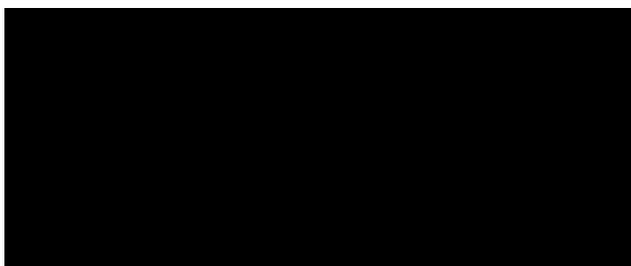
I'd be grateful if you could respond by return, to confirm safe receipt of this submission and the attached documents. If there are any issues, please let us know.

Kind regards,

James



**James Scarborough**  
Principal Planner (Team Leader)  
GJP



[gjplanning.co.uk](http://gjplanning.co.uk)



The content of this email is confidential and intended for the recipient specified in message only. It is strictly forbidden to share any part of this message with any third party, without a written consent of the sender. If you received this message by mistake, please reply to this message and follow with its deletion, so that we can ensure such a mistake does not occur in the future.





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](mailto: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](mailto: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	John Greggain	Mr Geraint John
Teitl swydd (lle y bo'n berthnasol) Job title (where relevant)		Planning Consultant
Sefydliad (lle y bo'n berthnasol) Organisation (where relevant)	L. Greggain & Co Ltd	GJP
Cyfeiriad Address		
Rhif ffôn Telephone no		
E-bost Email address		
Llofnodwyd (gallwch teipio) Signed (can be typed)		
Dyddiad	16/12/2024	



Date		
<b>RHAN B: Eich sylw</b>		
<b>PART B: Your representation</b>		
Eich enw / sefydliad Your name / organisation	GJP	
<b>1. Ar ba ran/rannau o'r Cynllun (neu ddogfennau ategol) rydych yn rhoi sylwadau?</b> <b>1. Which part(s) of the Plan (or supporting documents) are you commenting on?</b>		
Rhif(au) polisi Cynllun Datblygu Lleol neu ddyraniad safle LDP policy or site allocation number(s)	HSG/048/00038	
Rhif(au) paragraff y Cynllun Datblygu Lleol neu adran LDP paragraph or section number(s)	Refer to Submission	
Cyfeiriad(au) Map Cynigion y Cynllun Datblygu Lleol LDP Proposals Map reference(s)	Refer to Submission	
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.		
<b>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.</b> <i>I gael rhagor o wybodaeth am gadernid a gofynion gweithdrefnol, gweler y nodiadau cyfarwyddyd.</i> <b>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.</b> <i>For more information on soundness and procedural requirements, see the guidance notes.</i>		
Rwyf o'r farn bod y CDLI yn gadarn ac yn bodloni gofynion gweithdrefnol. I think the LDP is sound and meets procedural requirements.		
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.	Y	
Rwy'n credu na chafodd y gofynion gweithdrefnol eu bodloni. I think that the procedural requirements have not been met.		
<b>3. A hoffech i'r Cynllun gynnwys polisi, dyraniad safle neu paragraff newydd?</b>		



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

Y

**4. Os ydych am ychwanegu dyraniad safle newydd, a wnaethoch gyflwyno'r safle yn flaenorol fel y safle cais? Os felly, a fyddoch 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

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/profion 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.

Please refer to submission

*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.

Y

**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.

Y

*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').

Housing site at 'Land North of Hayston View, Johnston' - HSG/048/00038

**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.

*Rwy'n dymuno cael fy nghlywed yn Saesneg.*

I wish to be heard in English.

Y



## Nodiadau cyfarwyddyd

### Guidance notes

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

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

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

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

Os ydych yn gwrthwynebu, dylech ddweud pam rydych yn credu bod y Cynllun yn ansad a sut y dylid newid y Cynllun er mwyn ei wneud yn gadarn.

Lle cynigiwch newid i'r Cynllun, byddai o gymorth esbonio pa brawf/brofion cadernid y credwch y mae'r Cynllun yn eu methu. Os yw eich sylw yn perthyn i'r ffordd gafodd y Cynllun ei baratoi neu'r ffordd yr ymgynghorwyd arno, mae'n debygol y bydd eich sylwadau yn perthyn i 'ofynion gweithdrefnol'.

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

Os ydych yn ceisio am fwy nag un newid i'r

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

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

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

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

If you are making an objection, you should say why you think the Plan is unsound and how the Plan should be changed to make it sound.

Where you propose a change to the Plan it would be helpful to make clear which test(s) of soundness you believe the Plan fails. If your comment relates to the way in which the Plan has been prepared or consulted on, it is likely that your comments will relate to 'procedural requirements'.

Failing to identify a test will not mean that your comments will not be considered, providing it relates to the Plan or its supporting documents. You should include all your comments on the form, using accompanying documents and supporting evidence where necessary.



*Cynllun, nid yw bob tro yn angenrheidiol i lenwi ffurflenni ar wahân ar gyfer pob darn o'ch sylw. Fodd bynnag, gallai fod yn ddefnyddiol o bosibl i ddefnyddio dwy ffurflen ar wahân os ydych yn dymuno siarad mewn gwrandawriad am rai gwrthwynebiadau ond nid rhai eraill.*

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

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

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



*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](mailto:ldp@pembrokeshire.gov.uk) neu Y Tîm Cynlluniau Datblygu, Neuadd y Sir, Freeman's Way, Hwlfordd, Sir Benfro, SA61 1TP*

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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)**

<i>Enw Name</i>	John Greggain	Mr Geraint John
<i>Teitl swydd (lle y bo'n berthnasol) Job title (where relevant)</i>		Planning Consultant
<i>Sefydliad (lle y bo'n berthnasol) Organisation (where relevant)</i>	L. Greggain & Co Ltd	GJP
<i>Cyfeiriad Address</i>		
<i>Rhif ffôn Telephone no</i>		
<i>E-bost Email address</i>		
<i>Llofnodwyd (gallwch teipio) Signed (can be typed)</i>		
<i>Dyddiad / Date</i>	16/12/2024	



**RHAN B: Eich sylw**

**PART B: Your representation**

Eich enw / sefydliad Your name / organisation	GJP
--	-----

**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)	HSG/086/LDP2/1
Rhif(au) paragraff y Cynllun Datblygu Lleol neu adran LDP paragraph or section number(s)	Refer to Submission
Cyfeiriad(au) Map Cynigion y Cynllun Datblygu Lleol LDP Proposals Map reference(s)	Refer to Submission
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.	

**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.	
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.	Y
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

Y

### 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

*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.

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### 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/profion 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.

Please refer to submission

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

Y

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.*

Y

I want to speak at a public hearing.

*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').



HSG/086/LDP2/1

**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.

*Rwy'n dymuno cael fy nghlywed yn Saesneg.*

I wish to be heard in English.

Y



## Nodiadau cyfarwyddyd

### Guidance notes

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

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

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

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

Os ydych yn gwrthwynebu, dylech ddweud pam rydych yn credu bod y Cynllun yn ansad a sut y dylid newid y Cynllun er mwyn ei wneud yn gadarn.

Lle cynigiwch newid i'r Cynllun, byddai o gymorth esbonio pa brawf/brofion cadernid y credwch y mae'r Cynllun yn eu methu. Os yw eich sylw yn perthyn i'r ffordd gafodd y Cynllun ei baratoi neu'r ffordd yr ymgynghorwyd arno, mae'n debygol y bydd eich sylwadau yn perthyn i 'ofynion gweithdrefnol'.

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

Os ydych yn ceisio am fwy nag un newid i'r

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

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

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

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

If you are making an objection, you should say why you think the Plan is unsound and how the Plan should be changed to make it sound.

Where you propose a change to the Plan it would be helpful to make clear which test(s) of soundness you believe the Plan fails. If your comment relates to the way in which the Plan has been prepared or consulted on, it is likely that your comments will relate to 'procedural requirements'.

Failing to identify a test will not mean that your comments will not be considered, providing it relates to the Plan or its supporting documents. You should include all your comments on the form, using accompanying documents and supporting evidence where necessary.



*Cynllun, nid yw bob tro yn angenrheidiol i lenwi ffurflenni ar wahân ar gyfer pob darn o'ch sylw. Fodd bynnag, gallai fod yn ddefnyddiol o bosibl i ddefnyddio dwy ffurflen ar wahân os ydych yn dymuno siarad mewn gwrandawriad am rai gwrthwynebiadau ond nid rhai eraill.*

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

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

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

## Thomas, Kane

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**From:** [REDACTED]  
**Sent:** 16 December 2024 10:43  
**To:** LDP - For Enquiries  
**Cc:** Geraint John; Kieron Lediard; Oliver Stone  
**Subject:** Deposit Plan - Land North of Hayston View, Johnston (ref. HSG/048/00038)  
**Attachments:** 22.02.08 R531 SK-01B\_Proposed Site Plan.pdf; 240618 Deposit Plan 2 Comments Form.pdf; PCC Deposit Plan Representation - Land North of Hayston View, Johnston - December 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.**

Dear Sir / Madam,

Please find enclosed, on behalf of, and under instruction from our client, L. Greggain and Co Ltd, representations for consideration in response to the Pembrokeshire County Council LDP2 (2017-2033) Deposit Plan Consultation. This submission comments on the Deposit Plan itself, and by association, the site 'Land North of Hayston View' (as identified above) that is allocated in the Plan.

The documents forming part of the submission are as follows :

- GJP LDP Representations;
- Proposed Site Plan; and
- Deposit Plan Comments Form.

I'd be grateful if you could respond by return, to confirm safe receipt of this submission and the attached documents. If there are any issues, please let us know.

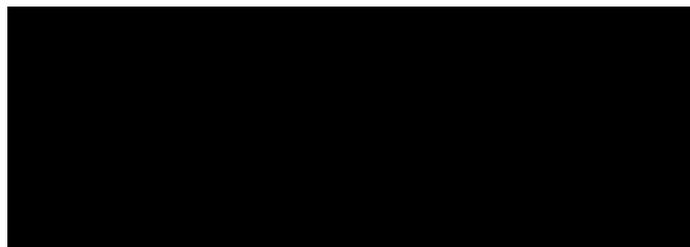
Kind regards,

James



**James Scarborough**  
Principal Planner (Team Leader)  
GJP

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[gjplanning.co.uk](http://gjplanning.co.uk)

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The content of this email is confidential and intended for the recipient specified in message only. It is strictly forbidden to share any part of this message with any third party, without a written consent of the sender. If you received this message by mistake, please reply to this message and follow with its deletion, so that we can ensure such a mistake does not occur in the future.



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](mailto: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](mailto: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	John Greggain	Mr Geraint John
Teitl swydd (lle y bo'n berthnasol) Job title (where relevant)		Planning Consultant
Sefydliad (lle y bo'n berthnasol) Organisation (where relevant)	L. Greggain & Co Ltd	GJP
Cyfeiriad Address		
Rhif ffôn Telephone no		
E-bost Email address		
Llofnodwyd (gallwch teipio) Signed (can be typed)	Geraint John	
Dyddiad		



Date	
<b>RHAN B: Eich sylw</b>	
<b>PART B: Your representation</b>	
Eich enw / sefydliad Your name / organisation	GJP
<b>1. Ar ba ran/rannau o'r Cynllun (neu ddogfennau ategol) rydych yn rhoi sylwadau?</b> <b>1. Which part(s) of the Plan (or supporting documents) are you commenting on?</b>	
Rhif(au) polisi Cynllun Datblygu Lleol neu ddyraniad safle LDP policy or site allocation number(s)	HSG/048/00038
Rhif(au) paragraff y Cynllun Datblygu Lleol neu adran LDP paragraph or section number(s)	Refer to Submission
Cyfeiriad(au) Map Cynigion y Cynllun Datblygu Lleol LDP Proposals Map reference(s)	Refer to Submission
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.	
<b>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.</b> <i>I gael rhagor o wybodaeth am gadernid a gofynion gweithdrefnol, gweler y nodiadau cyfarwyddyd.</i> <b>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.</b> <i>For more information on soundness and procedural requirements, see the guidance notes.</i>	
Rwyf o'r farn bod y CDLI yn gadarn ac yn bodloni gofynion gweithdrefnol. I think the LDP is sound and meets procedural requirements.	
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.	Y
Rwy'n credu na chafodd y gofynion gweithdrefnol eu bodloni. I think that the procedural requirements have not been met.	
<b>3. A hoffech i'r Cynllun gynnwys polisi, dyraniad safle neu paragraff newydd?</b>	



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

Y

**4. Os ydych am ychwanegu dyraniad safle newydd, a wnaethoch gyflwyno'r safle yn flaenorol fel y safle cais? Os felly, a fyddoch 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

Land North of Hayston View, Johnston

Cyfeiriad y cais

Site reference

HSG/048/00038

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/profion 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.

Y

**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.

Y

*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').

Housing site at 'Land North of Hayston View, Johnston'

**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.

*Rwy'n dymuno cael fy nghlywed yn Saesneg.*

I wish to be heard in English.

Y



## Nodiadau cyfarwyddyd

### Guidance notes

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

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3. A fydd y cynllun yn cyflawni? h.y. a yw'n debygol o fod yn effeithiol?)

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

Os ydych yn gwrthwynebu, dylech ddweud pam rydych yn credu bod y Cynllun yn ansad a sut y dylid newid y Cynllun er mwyn ei wneud yn gadarn.

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

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

If you are making an objection, you should say why you think the Plan is unsound and how the Plan should be changed to make it sound.

Where you propose a change to the Plan it would be helpful to make clear which test(s) of soundness you believe the Plan fails. If your comment relates to the way in which the Plan has been prepared or consulted on, it is likely that your comments will relate to 'procedural requirements'.

Failing to identify a test will not mean that your comments will not be considered, providing it relates to the Plan or its supporting documents. You should include all your comments on the form, using accompanying documents and supporting evidence where necessary.



*Cynllun, nid yw bob tro yn angenrheidiol i lenwi ffurflenni ar wahân ar gyfer pob darn o'ch sylw. Fodd bynnag, gallai fod yn ddefnyddiol o bosibl i ddefnyddio dwy ffurflen ar wahân os ydych yn dymuno siarad mewn gwrandawriad am rai gwrthwynebiadau ond nid rhai eraill.*

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

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

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



16th December 2024

fao. The Development Plans Team

address. County Hall,  
Freeman's Way,  
Haverfordwest,  
Pembrokeshire.  
SA61 1TP

Dear Sir / Madam,

### Deposit Plan Consultation Response – HSG/048/00038 – Land North of Hayston View, Johnston

We are instructed, on behalf of our client and the site promoter, L. Greggain and Co Ltd, make this submission in response to the Pembrokeshire County Council Local Development Plan 2 (2017-2033) Deposit Plan Consultation.

In summary, these representations support in principle the allocation of the site (LDP2 Ref. HSG/048/00038) for residential use. Notwithstanding this, our client wishes to object to part of the site's exclusion as an allocation for residential (which is identified as Recreational Open Space in the Deposit Plan). The reasoning for the objection is set out in further detail in these representations below. The site is currently allocated to provide 92no. units, of which 50no. are expected to be delivered in the Plan period up to 2033. These submissions also make submissions in respect to the total number of units expected to be yielded from the (amended) site.

Accordingly, these representations set out the following:

- General support for Policy GN16 and its provisions, and the intended allocation of the site;
- Object to the site's part exclusion as an allocation, in light of the allocated Recreational Open Space;
- Object to the number of units allocated for the site;
- Detailed changes to the proposed trajectory of the site in the Plan period; and
- Detailed terminology changes to the wording of Policy GN15.

Further detail relating to the above points forming part of these representations is set out within this statement below.

### Background

Regulation 18 of the Local Development Plan Regulations requires that a person may make representations on deposit proposals of an emerging Local Development Plan within a period of 8 weeks from the day on which the LPA publishes the Deposit Plan.

On 21<sup>st</sup> October 2024 Pembrokeshire County Council opened a consultation period inviting comments on the Deposit Plan, which closes at midnight on 16<sup>th</sup> December 2024.

The Deposit Plan, and in particular Policy SP 2 (Housing Requirement) and SP 3 (Affordable Housing Target) sets out that *"Provision is made for approximately 6,425 dwellings in the Plan period, to enable delivery of a housing requirement for 5,840 dwellings (365 per year)"*. A total annual build rate of 365 dwellings per annum is proposed, of which 125 are affordable housing units. This is based on a 5-year and 10-year average completion rate from 2014/15-2018/19 and 2009/10-2018/19 respectively, which evidences a sustainable growth scenario.

In order to achieve this, the Deposit Plan proposes a mixture of land allocated specifically for housing, as determined by Policy GN 16 (Residential Allocations), and appropriate development within settlement boundaries. Of the allocated sites, a minimum of 2605 market units are set to be delivered over the Plan period, with some expected to deliver well beyond the Plan period. Similarly, these allocations would also deliver a minimum of 889 affordable units within the plan period. Policy GN 16 (Residential Allocations) sets out the sites which are allocated for residential development in the period up to 2033 in order to deliver the housing requirement set out by Policy SP2 (Housing Requirement) and is set out in the table below,

**GN 16 Residential Allocations**

The following sites are allocated for residential development:

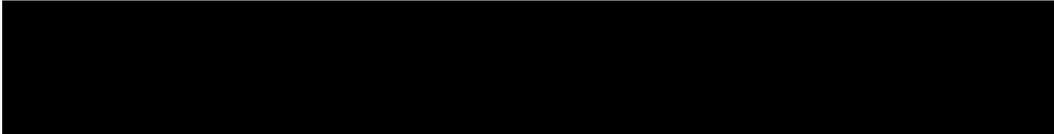
LDP2 Reference	Site Name	Settlement	Minimum Units In Plan Period	Indicative Affordable Housing Requirement		Delivery timescale Year 1-5 (ST) Year 6-10 (MT) Year 11-16 (LT)	Units Beyond The Plan Period	Area Ha	Potential For Self Build Indicated By Site Promoter
				Percentage (%)	Unit Number				
HSG/048/00038	North of Hayston View	Johnston	50	6%	3	MT/LT	42	4.01	Yes
HSG/048/LDP2/1	Maes yr Ysgol	Johnston	13	Off-site contribution		MT/LT	0	0.58	No

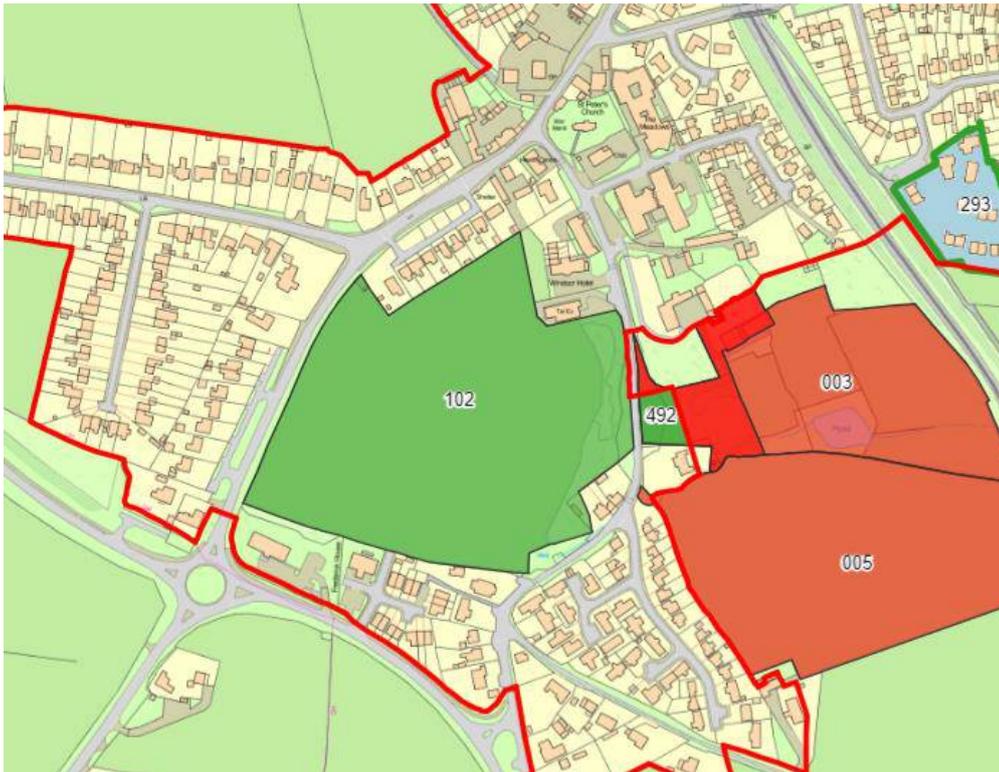
*Policy GN 16 (Residential Allocations) of Pembrokeshire County Council Deposit Plan – amended to only depict sites relevant to Johnston*

As set out above, the site (Land North of Hayston View) has been included as a housing allocation (site ref. HSG/048/00038) within the Deposit Plan, to provide a minimum of 50no. units in the Plan period, with a further 42no. units to deliver beyond the Plan period. The inclusion of the site is welcomed by our client, who would like to take this opportunity to further provide and express their support for the Deposit Plan. That said, as previously stated, our client objects to the definition of the site in the Proposals Map, and to the number of units expected to be delivered. Moreover, objection is raised to the trajectory identified for the proposal to yield units - within and beyond the Plan period.

**Candidate Site ref. HSG/048/00038**

As set out above, the site is allocated for a minimum of 92no. units, of which 50no. are to be delivered in the Plan period. Whilst the principle of the allocation is accepted, the client wishes to make the case that the site has been submitted and promoted for 82no. units to-date, which would be wholly delivered within the Plan period, and has been robustly supported on this basis accordingly through the RLDP process. Moreover, the candidate site promoted to-date has included all of the land within our client’s ownership, including that identified as a Recreational Open Space (ref. OSP/048/07) in the Deposit Plan, as shown below:





Candidate Site Register Map (site outlined in green)

As outlined above, within the Deposit Plan, part of the site has been allocated for Recreational Open Space, as identified within the plan below:



Pembrokeshire County Council Deposit Plan Proposals Map

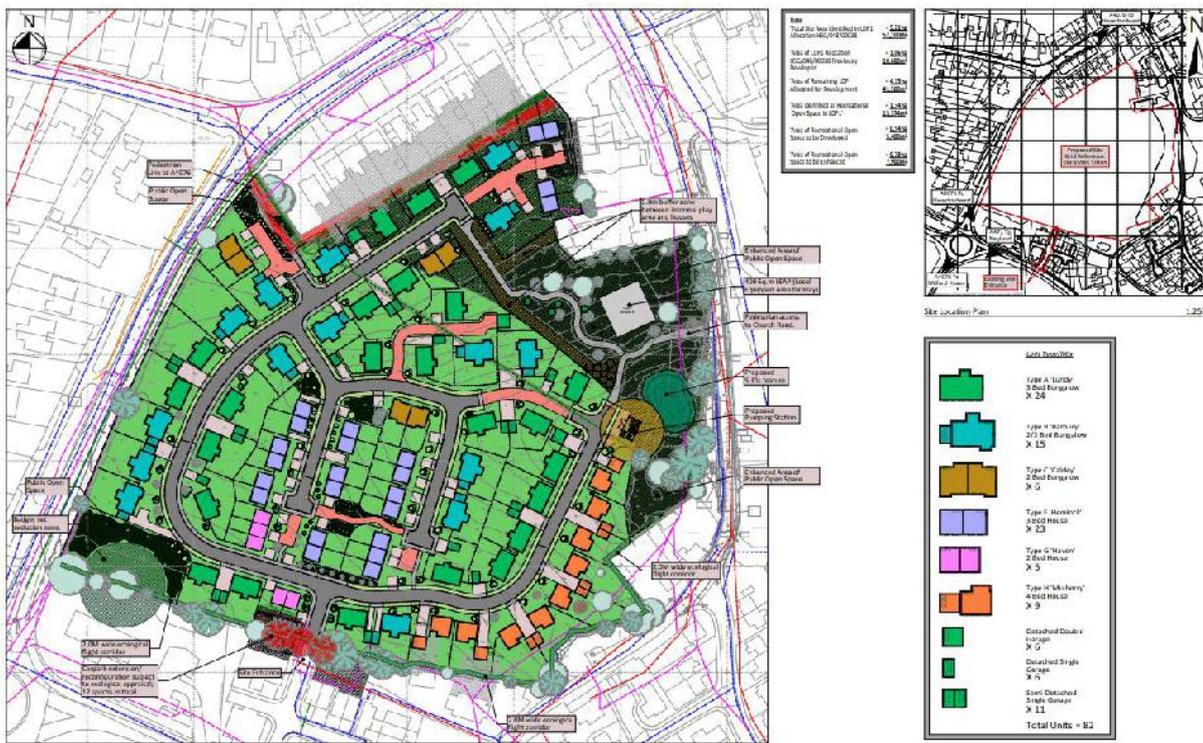
Accordingly, our client wishes to object to Policy GN16 within the Deposit Plan for the following reasons:

1. The minimum number of units allocated for the site is considered to be greater than the site's capacity for residential development;
2. The housing trajectory identified for the site to yield residential units within the Plan period is not representative of the likely build out of the site; and
3. All of the land within the candidate site promoted through the RLDP process should be allocated for residential development.

These submissions are discussed and evidenced in detail below.

### Site Capacity

The candidate site was originally submitted as part of the Call for Candidate Sites process in 2018 for 82no. units, and was supported by the proposed layout overleaf:



Site Plan

The indicative site plan suggests that the site could accommodate a total of 82no. units - 77no. of which are proposed to be open market, alongside the provision of 5no. units of affordable housing. As indicated above, a range of house types are proposed consisting of detached and semi-detached houses and bungalows, including 2, 3 and 4 bedroom properties. The site plan has been supported by the submission of a Development Viability Model through the RLDP process which has confirmed that 82no. units are viable within the site, and therefore, deliverable within the Plan period.

Clearly there has been ample evidence provided through the RLDP process that the site is wholly deliverable during the early stages of the revised LDP. The indicative site plan has been informed by the constraints and opportunities to development at the site, with significant work having been undertaken on the candidate site in order to inform the number of units proposed. Moreover, the site has considered the various non-residential elements that need to form part of the scheme, including 3no. areas of Public Open Space, Local Equipped Area of Play (LEAP), foul pumping station, SuDS green infrastructure and biodiversity benefits. With these elements considered and incorporated into the site layout, it has resulted in a robust and informed proposal accordingly, and is wholly acceptable in respect of

national and local planning policy provisions. For this reason, as well as the impressive track record of the site promoter and developer, it is considered that the site is wholly and realistically deliverable, and should be allocated for 82no. units accordingly.

On this basis, the site's allocation for 92no. units should be reduced to 82no. units, as the site capacity work undertaken has determined that this is the level of provision that can be reasonably and appropriately be achieved within the site – which has robustly considered its opportunities and constraints. It is considered that any higher provision would likely undermine the placemaking credentials of the site, and in turn, result in an undeliverable scheme accordingly.

*Housing Trajectory*

Whilst the site is allocated for 92no. units in the Deposit Plan, only 50no. are identified within the trajectory to be delivered in the Plan period. An extract of the relevant tables is provided overleaf:

LDP2 Reference	Site Name	Settlement	Minimum Units In Plan Period	Indicative Affordable Housing Requirement		Delivery timescale Year 1-5 (ST) Year 6-10 (MT) Year 11-16 (LT)	Units Beyond The Plan Period	Area Ha	Potential For Self Build Indicated By Site Promoter
				Percentage (%)	Unit Number				
HSG/048/00038	North of Hayston View	Johnston	50	6%	3	MT/LT	42	4.01	Yes

*Policy GN16 – Site Allocation*

Settlement Tier	LDP 2 Reference	Site Name	Settlement	Total Units to be delivered in Plan period	Time lag to construction start			Phasing of Development (2023 to end of 2033)												Units beyond the Plan period	
					Time period for pre-application discussions / PAC consultation	Time period for submission of planning application and determination	Time period for the discharge of relevant conditions to enable site construction	Number of units complete	Number of units UC	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-2033		2033
Service Centre	HSG/048/00038	North of Hayston View	Johnston	50	2025	2026	2026	N/A	N/A	0	0	0	15	15	15	5	0	0	0	0	42

*Housing Trajectory*

As set out in the above tables, the site is identified in the Deposit Plan to deliver a minimum of 50no. units within the Plan period, with a further 42no. to be delivered beyond the period. Notwithstanding the above case made in respect of the number of units within the site, it is considered that the trajectory for the site is incorrect, and not in line with the evidence presented and submitted to-date for the proposal. Specifically, it is the case that the proposed development of the site will yield in full within the Plan period, and this is expanded in further detail below.

The above table identifies that the development will start to yield units in the year 2026-27, with final completion in the year 2029-30. The anticipated 'start date' is not disputed, and these timescales have been supported by viability evidence submitted to-date through the RLDP process. That said, the number of units scheduled to yield on an annual basis through the period is contested. It is considered that a higher annual completion rate is appropriate for the site – which in turn, will deliver the full allocation in the Plan period.

Accordingly, it is proposed that the following trajectory of the site is appropriate for a development of this scale in this location, and therefore, should be adopted for the site's allocation in the RLDP:

2026-27	2027-28	2028-29	2029-30
25	25	25	7

*Proposed Trajectory*

It is considered that the above trajectory is achievable, and will bring about a net gain of 32no. units to be delivered in the Plan period, over and above the 50no. currently identified. As outlined previously, the site is entirely suitable and

available for development, and accordingly, represents an acceptable site to yield much needed affordable housing and market housing within the short and medium-term in the Plan period. It is therefore considered that the trajectory should be amended accordingly to reflect the above, as it has been evidenced to-date that the site can come forward for development wholly within the Plan period.

### *Recreational Open Space OSP/048/07*

As set out previously, we object to the inclusion of the Recreational Open Space parcel, which sits within the candidate site boundary submitted for the proposal, albeit outside of the defined residential allocation in the emerging Plan. It should be noted that this designation is a proposed designation, as opposed to reflecting or representing any existing functioning open space. The designation in the Proposals Map effectively 'creates' the open space accordingly. It is considered equally apt and appropriate for the proposed housing allocation scheme to achieve and bring about this provision – indeed necessary, as there is a significant risk of it not being delivered, and / or subsequently maintained if designated and provided separately to the proposed development. The site plan included in these representations (and submitted in support of the candidate site) includes this land as an integral part of the overall scheme – shown for 12no. units, as well as an 'Enhanced Area of Public Open Space', SuDS, and LEAP.

In terms of the quantum and level of provision, whichever option or approach is followed, the area of Recreational Open Space currently designated in the emerging Plan amounts to 1.34ha in the Deposit Plan, whereas the proposal for the whole site includes area of open space to be developed (0.54ha) and enhanced (0.79ha). Accordingly, with the two areas proposed within the scheme are added together, the proposed provision of open space within any development scheme / area will amount to 1.33ha – therefore, representing a -0.1ha difference. There will be no difference in this level of provision accordingly.

Notwithstanding this, and as outlined above, this parcel of land if included within the developable area will result in 12no. properties, as well as other key elements of the scheme. These would need to be located elsewhere should the Recreational Open Space be retained in the present form. This would, in turn, result in the loss of further units across the site to accommodate these requirements, impacting the overall delivery of the site and its yield.

Given the immaterial difference in open space between the two options – as per the allocation in the Deposit Plan, or integrated within the proposed development, it is considered that it is entirely appropriate and necessary for the whole site to be allocated, and for open space to be integrated into the site accordingly. This will also ensure that a placemaking-led scheme is achieved at the site, in accordance with both national and local planning policies.

Moreover, combining the development areas and the open space ensures a more cohesive and efficient use of the land, allowing for a balanced mix of residential and green space within a unified design. This integration promotes better connectivity between the areas, enhancing accessibility for residents to both the housing and recreational spaces. Furthermore, developing the site as one enables a more efficient layout, optimizing space and resources while ensuring that the development meets both housing and community needs. Separating the parcels would create division, reduce the overall density and yield of the site, and limit the potential for creating a sustainable environment. The provision and future maintenance of any open space will also be less certain.

### **Policy GN15**

It is considered that the current wording of Policy GN15 is restrictive, specifically in respect to criterion D, and as such, a more flexible approach should be adopted by the Authority. The currently proposed wording of policy '*GN15, Criterion (D)*' is worded below in italics:

*"D. All new build residential development on sites of 5 or more units must provide a minimum of 20% of properties built to Lifetime Homes Standards and in addition, wheelchair user dwellings will be supported;"*

Whilst the site is not yet subject to formal pre-application dialogue or planning application, it is expected to be in the short term (in order to support deliverability, and engage early with the Local Authority to ensure the comprehensive dialogue takes place with all stakeholders).

It is considered that the policy wording needs to adopt a flexible approach which will still require the same output and principles to be met in meeting the policy requirements. Specifically, the policy wording uses the term 'must' in setting out the requirements of the overall policies, however, it is considered that this can create inflexibility at planning application stage. Accordingly, it is considered that an alternative approach / provision would be more appropriate and justified. As such, the use of the term 'should' is considered more appropriate, which is equally expecting in terms of what is expected as part of the policy provision, but not as absolute.

The following suggested change to the terminology / wording is set out in red text to outline where appropriate wording to policy text should be amended to improve flexibility to the policy. It's considered that amendment will not undermine or materially affect the policy requirements, rather, allow a degree of interpretation by the applicant and decision-maker (The Local Authority).

*Suggested Policy Wording for Policy GN15, Criterion (D)*

*"All new build residential development on sites of 5 or more units ~~must~~ should provide a minimum of 20% of properties built to Lifetime Homes Standards and in addition, wheelchair user dwellings will be supported".*

Justification for Amendment

It is considered that, given the current wording of the text, any subsequent planning application that did not precisely and literally accord with the provisions of the Policy text (as currently worded) would not be in accord with the policy, and by association the Plan, and thereby incompatible. This is as a result of the wording including the term 'must'. Greater flexibility is therefore required to be provided for in the wording.

Whilst the emerging proposals for the site fully expect to deliver the principles and key elements of the GN15 Policy, greater flexibility (or rather less absolute requirement) needs to be allowed for. This reflects the position that the proposals are continually emerging, and will continue to evolve as a result and product of the subsequent planning application process (and consultation responses to that). It also makes allowance for any changes in market circumstances / constraints – which can change over a plan period.

In any event, it is considered that the scheme can meet the Lifetime Home Standards requirements, as the development comprises 14no. bungalows (both 2 and 3-beds), which represents approximately 22% of the overall development. Whilst specific floorplans for the bungalows have not been submitted to-date, it is considered that they can be designed in accordance with the relevant requirements set out in the Lifetime Home Standards. As such, the proposed development as presented would meet the requirements of the Policy to deliver at least 20% that meet the Lifetime Home Standards.

Notwithstanding the above, it is considered that greater flexibility in terms of the wording of the policy is needed – to ensure that residential allocations can come forward in compliance with the Plan period. It is considered to be more appropriate to appraise the position as and when schemes for each site are presented and assessed, and recognise that some changes may be necessary or merited.

Failure to adjust the language and terminology of the Plan in these respects could have the ability to frustrate the delivery of sites in the Plan.

Moreover, policy wording 'should' rather than 'must' has been accepted and adopted into various policies for other neighbouring authority Plans, including Swansea LDP (adopted 28<sup>th</sup> February 2019), and more recently, in the Bridgend LDP (adopted 13<sup>th</sup> March 2024). It is therefore acknowledged by previous Plans and Inspectors that this wording is appropriate and acceptable.

## Summary and Conclusion

As set out within these representations, evidence has of course been provided through the previous extensive representations to the emerging LDP (including Candidate Sites representations in 2018, and representations to the Preferred Strategy in 2019), these evidence the suitability and viability of the site. Through the course of the previous representations to yourselves, the site promoter, L Greggain and Co Ltd, has provided appropriate supporting information, including a Viability Appraisal. Together the submissions have demonstrated that the site is not only appropriately located within close association and connection to Johnston, but that it is deliverable in line with placemaking requirements and economically viable - all of which fully comply with Welsh Assembly Government and Council aspirations of creating cohesive new neighbourhoods as defined in PPW12 and Future Wales 2040.

As highlighted above, the allocation of the site will enable and facilitate sustainable growth as per the aspirations of Pembrokeshire County Council.

With regards to the representations submitted to date, they have demonstrated that the site is inherently suitable for residential development, which is acknowledged by PCC by virtue of the site's inclusion as a housing allocation within the Deposit Plan. It is therefore considered prudent at this stage of the LDP review, and within this submission, to further highlight the deliverability of the site, whereby the proposed development is wholly available and deliverable to yield its full allocation within the Plan period, and overall, contribute to the wider housing requirement in the Plan.

It is considered that the site becomes more acceptable and deliverable by integrating the current open space and housing allocation parcels, as it combines both green space and residential areas into a cohesive development.

The site promoter, L Greggain and Co Ltd, who has a significant track record in delivering housing in the County), is actively seeking to prepare and submit a formal planning application to Pembrokeshire County Council to secure permission for the site to enable its development at the earliest opportunity. As part of this, further supporting information is being procured to present a robust planning application over and above the representations already made, and made herein.

To conclude, our client wishes to object to the current allocation of the site in terms of the number of units to be identified within and beyond the Plan period, and considers that a smaller provision (82no. units) is necessary as informed by detailed site assessment work undertaken to-date. Moreover, the whole site should be allocated (through the removal of the Recreation Open Space designation, and the enlargement of the residential allocation ref. HSG/048/00038 to integrate the open space within the housing area). This will allow for the 82no. units to be delivered in the Plan period, whilst bringing greater certainty to the delivery and future maintenance of such provision.

We consider that the information contained within this consultation response should provide sufficient evidence to support the approach of the Deposit Plan to retain the site as an allocation for residential development during the Plan period to 2033, and to make the necessary revisions set out.

Yours sincerely,



**Geraint John**  
Director  
Geraint John Planning Ltd.



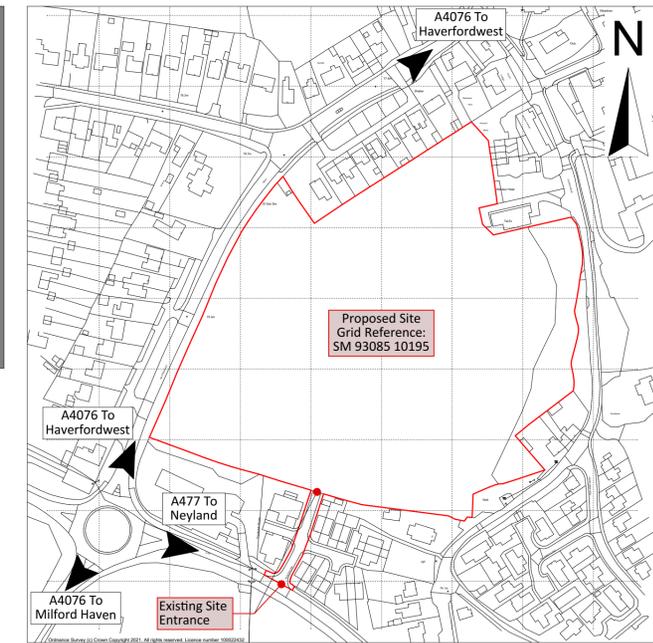


Proposed Site Plan

1:750

**Note**

Total Site Area identified in LDP1 Allocation HSG/048/00038	= 5.21ha 52,100m <sup>2</sup>
'Area of LDP1 Allocation HSG/048/00038 Previously Developed	= 1.06ha 10,600m <sup>2</sup>
'Area of Remaining LDP1 Allocated for Development	= 4.15ha 41,500m <sup>2</sup>
'Area identified as Recreational Open Space in LDP1'	= 1.34ha 13,374m <sup>2</sup>
'Area of Recreational Open Space to be Developed	= 0.54ha 5,400m <sup>2</sup>
'Area of Recreational Open Space to be Enhanced	= 0.79ha 7,900m <sup>2</sup>



Site Location Plan

1:2500

Unit Type/Mix	
	Type A 'Lundy' 3 Bed Bungalow X 24
	Type B 'Barbury' 2/3 Bed Bungalow X 15
	Type C 'Caldey' 2 Bed Bungalow X 6
	Type F 'Hemlock' 3 Bed House X 23
	Type G 'Haven' 2 Bed House X 5
	Type H 'Mulberry' 4 Bed House X 9
	Detached Double Garage X 6
	Detached Single Garage X 6
	Semi-Detached Single Garage X 11
<b>Total Units = 82</b>	

Revision:	Date:	By:	Notes:
A - Badger exclusion zone/ecological buffer zones identified, unit mix updated	29th June 2021	RH	
B - Unit mix updated, public open space identified	8th Feb 2022	RH	

Client:	L Greggain & Co Ltd Beatgrove Ltd
Job Title:	Land Adjacent Milford Road, Johnston, Pembrokeshire SA62 3HB
Scale:	Noted Date: June '21 Drawn: SE/RH
Drawing Title:	FEASIBILITY DRAWINGS - Master Site Plan



**R531 SK-01B**

**Thomas, Kane**

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**From:** [REDACTED]  
**Sent:** 16 December 2024 10:38  
**To:** LDP - For Enquiries  
**Cc:** Geraint John; Kieron Lediard; Oliver Stone  
**Subject:** Deposit Plan - Myrtle Meadows, Milford Haven (ref. HSG/086/LDP2/1)  
**Attachments:** 240618 Deposit Plan 2 Comments Form.pdf; PCC Deposit Plan Representation - Myrtle Meadows, Milford Haven - December 2024.pdf; 18.03.23 R356 BP-03A Indicative Site Layout Plan.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.**

Dear Sir / Madam,

Please find enclosed, on behalf of, and under instruction from our client, L. Greggain and Co Ltd , representations for consideration in response to the Pembrokeshire County Council LDP2 (2017-2033) Deposit Plan Consultation. This submission comments on the Deposit Plan itself, and by association, the site 'Myrtle Meadows' (as identified above) that is allocated in the Plan.

The documents forming part of the submission are as follows :

- GJP LDP Representations;
- Indicative Site Layout Plan; and
- Deposit Plan Comments Form.

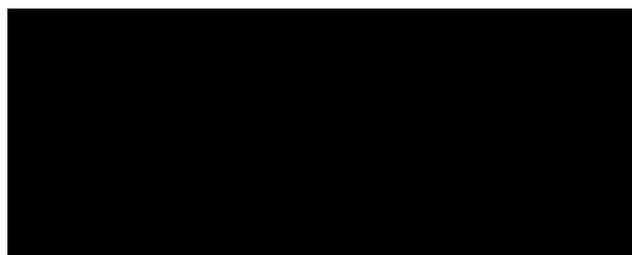
I'd be grateful if you could respond by return, to confirm safe receipt of this submission and the attached documents. If there are any issues, please let us know.

Kind regards,

James



**James Scarborough**  
Principal Planner (Team Leader)  
GJP



[gjplanning.co.uk](http://gjplanning.co.uk)



The content of this email is confidential and intended for the recipient specified in message only. It is strictly forbidden to share any part of this message with any third party, without a written consent of the sender. If you received this message by mistake, please reply to this message and follow with its deletion, so that we can ensure such a mistake does not occur in the future.



*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](mailto: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](mailto: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)**

<i>Enw Name</i>	John Greggain	Mr Geraint John
<i>Teitl swydd (lle y bo'n berthnasol) Job title (where relevant)</i>		Planning Consultant
<i>Sefydliad (lle y bo'n berthnasol) Organisation (where relevant)</i>	L. Greggain & Co Ltd	GJP
<i>Cyfeiriad Address</i>		
<i>Rhif ffôn Telephone no</i>		
<i>E-bost Email address</i>		
<i>Llofnodwyd (gallwch teipio) Signed (can be typed)</i>		
<i>Dyddiad / Date</i>		



**RHAN B: Eich sylw**

**PART B: Your representation**

Eich enw / sefydliad Your name / organisation	GJP
--	-----

**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)	HSG/086/LDP2/1
Rhif(au) paragraff y Cynllun Datblygu Lleol neu adran LDP paragraph or section number(s)	Refer to Submission
Cyfeiriad(au) Map Cynigion y Cynllun Datblygu Lleol LDP Proposals Map reference(s)	Refer to Submission
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.	

**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.	
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.	Y
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

Y

### 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

Myrtle Meadows, Milford Haven, SA73 1DZ

*Cyfeiriad y cais*

Site reference

HSG/086/LDP2/1

*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.

Y

**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.

Y

*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').



**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.

*Rwy'n dymuno cael fy nghlywed yn Saesneg.*

I wish to be heard in English.

Y



## Nodiadau cyfarwyddyd

### Guidance notes

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

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

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

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

Os ydych yn gwrthwynebu, dylech ddweud pam rydych yn credu bod y Cynllun yn ansad a sut y dylid newid y Cynllun er mwyn ei wneud yn gadarn.

Lle cynigiwch newid i'r Cynllun, byddai o gymorth esbonio pa brawf/brofion cadernid y credwch y mae'r Cynllun yn eu methu. Os yw eich sylw yn perthyn i'r ffordd gafodd y Cynllun ei baratoi neu'r ffordd yr ymgynghorwyd arno, mae'n debygol y bydd eich sylwadau yn perthyn i 'ofynion gweithdrefnol'.

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

Os ydych yn ceisio am fwy nag un newid i'r

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

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

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

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

If you are making an objection, you should say why you think the Plan is unsound and how the Plan should be changed to make it sound.

Where you propose a change to the Plan it would be helpful to make clear which test(s) of soundness you believe the Plan fails. If your comment relates to the way in which the Plan has been prepared or consulted on, it is likely that your comments will relate to 'procedural requirements'.

Failing to identify a test will not mean that your comments will not be considered, providing it relates to the Plan or its supporting documents. You should include all your comments on the form, using accompanying documents and supporting evidence where necessary.



*Cynllun, nid yw bob tro yn angenrheidiol i lenwi ffurflenni ar wahân ar gyfer pob darn o'ch sylw. Fodd bynnag, gallai fod yn ddefnyddiol o bosibl i ddefnyddio dwy ffurflen ar wahân os ydych yn dymuno siarad mewn gwrandawriad am rai gwrthwynebiadau ond nid rhai eraill.*

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

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

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

tel.

mob.

email.

web.

address.

16th December 2024

fao. The Development Plans Team

address. County Hall,  
Freeman's Way,  
Haverfordwest,  
Pembrokeshire.  
SA61 1TP

Dear Sir / Madam,

### Deposit Plan Consultation Response – HSG/086/LDP2/1 – Myrtle Meadows, Milford Haven, SA73 1DZ

We are instructed, on behalf of our client and the site promoter, L. Greggain and Co Ltd, to make this submission in response to the Pembrokeshire County Council Local Development Plan 2 (2017-2033) Deposit Plan Consultation. In summary, these representations support in principle the allocation of the site in relation to *Policy GN16* (Residential Allocations), which identifies Myrtle Meadows (ref. HSG/086/LDP2/1) as a residential allocation. However, our client wishes to object to the detailed wording as set out in Policy GN15, Criterion (D), and to advocate a more flexible approach to be adopted within the policy. These submissions also make submissions in respect to the proposed trajectory for the site.

Accordingly, these representations set out the following:

- General support for Policy GN16 and its provisions, and the intended allocation of the site;
- Detailed changes to the proposed trajectory of the site in the Plan period; and
- Detailed terminology changes to the wording of Policy GN15.

Further detail relating to the above points forming part of these representations is set out within this statement below.

### Background

Regulation 18 of the Local Development Plan Regulations requires that a person may make representations on deposit proposals of an emerging Local Development Plan within a period of 8 weeks from the day on which the LPA publishes the Deposit Plan.

On 21<sup>st</sup> October 2024 Pembrokeshire County Council opened a consultation period inviting comments on the Deposit Plan, which closes at midnight on 16<sup>th</sup> December 2024.

The Deposit Plan, and in particular Policy SP 2 (Housing Requirement) and SP 3 (Affordable Housing Target) sets out that *"Provision is made for approximately 6,425 dwellings in the Plan period, to enable delivery of a housing requirement for 5,840 dwellings (365 per year)".* A total annual build rate of 365 dwellings per annum is proposed, of which 125 are affordable housing units. This is based on a 5-year and 10-year average completion rate from 2014/15-2018/19 and 2009/10-2018/19 respectively, which evidences a sustainable growth scenario.

In order to achieve this, the Deposit Plan proposes a mixture of land allocated specifically for housing, as determined by Policy GN 16 (Residential Allocations), and appropriate development within settlement boundaries. Of the allocated sites, a minimum of 2605 market units are set to be delivered over the Plan period, with some expected to deliver well

beyond the Plan period. Similarly, these allocations would also deliver a minimum of 889 affordable units within the plan period. Policy GN 16 (Residential Allocations) sets out the sites which are allocated for residential development in the period up to 2033 in order to deliver the housing requirement set out by Policy SP2 (Housing Requirement), and is set out in the table overleaf.

### GN 16 Residential Allocations

The following sites are allocated for residential development:

LDP2 Reference	Site Name	Settlement	Minimum Units In Plan Period	Indicative Affordable Housing Requirement		Delivery timescale Year 1-5 (ST) Year 6-10 (MT) Year 11-16 (LT)	Units Beyond The Plan Period	Area Ha	Potential For Self Build Indicated By Site Promoter
				Percentage (%)	Unit Number				
HSG/086/00222	South West of The Meads	Milford Haven	93	100%	93	MT/LT	0	3.1	Not Known
HSG/086/LDP2/1	Land at Myrtle Meadows, Steynton	Milford Haven	60	15%	9	LT	0	3.07	No
HSG/086/LDP2/2	East of Castle Pill Road Steynton	Milford Haven	23	Off-site contribution		MT/LT	0	0.78	Yes
HSG/086/LDP2/4	Former Hakin Infants' School	Milford Haven	14	100%	14	LT	0	0.49	No
HSG/086/LDP2/5	Former Hubberston VC School, Hakin	Milford Haven	26	100%	26	MT	0	0.9	No
HSG/086/LDP2/6	Former Hakin Junior School	Milford Haven	43	100%	43	LT	0	1.46	No
HSG/086/LDP2/7	North East of Beaoning, Steynton	Milford Haven	14	Off-site contribution		MT	0	0.49	Yes
S/HSG/086/LDP2/3	South of Conway Drive, Castle Pill Road, Steynton (see policy GN 19B)	Milford Haven	117	15%	17	LT	163	9.32	No
<b>Urban Settlements Total</b>			<b>1576</b>				<b>1117</b>	<b>96.86</b>	
<b>Urban Settlements Total as percentage of total allocations</b>			<b>67%</b>				<b>85%</b>	<b>68%</b>	

Policy GN 16 (Residential Allocations) of Pembrokeshire County Council Deposit Plan – amended to only depict sites relevant to Milford Haven

As set out above, Land at Myrtle Meadows has been included as a housing allocation (site ref. HSG/086/LDP2/1) within the Deposit Plan, to provide a minimum of 60no. units. This is expected to yield including 9no. affordable units, in years 11-16 of the Plan period to 2033. The inclusion of the site is welcomed by our client, who would like to take this opportunity to further provide and express their support for the Deposit Plan.

### Site Capacity

As set out above, the site is allocated for a minimum of 60no. units in the Plan period. The client wishes to make the case that the site has been planned, submitted and promoted for 63no. units to-date, which would be wholly delivered within the Plan period, this position has been robustly evidenced through the RLDP process, and promotion to date. Given that the anticipated (minimum) number of units identified for the site (60 units), and the planned number of units (63), it is considered that the total yields are comparable, and that the total identified capacity is robust and sound accordingly. It is considered unlikely that a significantly greater number of units will be capably yielded – given the density of development is consistent with surrounding existing built form.

Given the above, an indicative layout plan for the proposed 63 units on the site has been produced and submitted through previous representations, an extract of which is included overleaf:



## Suitability, Viability and Deliverability

It is noted that the Deposit Plan includes the Housing Trajectory in Appendix 2, which comprises a Table of the Timing and Phasing of Allocations (2018 – 2033). As set out in the trajectory, the site can, and will, deliver the full housing allocation within the Plan period.

Settlement Tier	LDP 2 Reference	Site Name	Settlement	Total Units to be delivered in Plan period	Time lag to construction start			Phasing of Development (2023 to end of 2033)											Units beyond the Plan period		
					Time period for pre-application discussions / PAC consultation	Time period for submission of planning application and determination	Time period for the discharge of relevant conditions to enable site construction	Number of units complete	Number of units UC	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32		2032-2033	2033
Urban	HSG/086/LDP2/1	Land at: Myrtle Meadows, Steynton	Milford Haven	60	2027	2028	2028	N/A	N/A	0	0	0	0	0	5	20	20	15	0	0	0

Housing Trajectory – Deposit Plan

Notwithstanding that the site is expected to yield its full allocation within the Plan period, as identified in the table above, it is considered that the site is able to start yielding in the year '2026-27' – effectively two years prior to its current start date set out in the trajectory. The site is readily available and suitable to accommodate the development in the short-term, given there are no extensive start-up works or costs that would delay the commencement of development on site. The site promoter, L Greggain and Co Ltd, who has a significant track record in delivering housing in the County (indeed the immediate vicinity of the site), is actively seeking to prepare and submit a formal planning application to Pembrokeshire County Council to secure permission for the site to enable its development at the earliest opportunity. As part of this, further supporting information is being procured to present a robust planning application over and above the representations already made, and made herein.

In light of the above, it is considered that the trajectory for the allocated site should be amended in line with the suggested changes above, which will only be of benefit to the LDP2, given it will yield much-needed housing earlier in the Plan period.

Evidence has of course been provided through the previous extensive LDP representations (including Candidate Sites representations in 2018 and representations to the Preferred Strategy in 2019), to evidence the suitability and viability of the site. Through the course of the previous representations, the site promoter, L Greggain and Co Ltd, has provided appropriate supporting information, including a Viability Appraisal. Together the submissions have demonstrated that the site is not only appropriately located within close association and connection to Milford Haven, but that it is deliverable in line with placemaking requirements and economically viable – all of which fully comply with Welsh Assembly Government and Council aspirations of creating cohesive new neighbourhoods as defined in PPW12 and Future Wales 2040.

As highlighted above, the allocation of the Myrtle Meadows site will enable and facilitate sustainable growth as per the aspirations of Pembrokeshire County Council.

With regards to the representations submitted to-date, they have demonstrated that the site is inherently suitable for residential development, which is acknowledged by yourselves by virtue of the site's inclusion as a housing allocation within the Deposit Plan. It is therefore considered prudent at this stage of the LDP review, and within this submission, to further highlight the unequivocal deliverability of the site, whereby it can be brought forward for development in line with the amended timescales set out above for the allocation

## Policy GN15 – Housing Mix, Second Homes and Short-term Holiday Lets, Space Standards and Requirements for Lifetime Homes Standards

It is considered that the current wording of Policy GN15 is restrictive, specifically in respect to criterion D, and as such, a more flexible approach should be adopted by the Authority. The currently proposed wording of policy 'GN15, Criterion (D)' is worded below in italics:

*“D. All new build residential development on sites of 5 or more units must provide a minimum of 20% of properties built to Lifetime Homes Standards and in addition, wheelchair user dwellings will be supported;”*

Whilst the site is not yet subject to formal pre-application dialogue or planning application, it is expected to be in the short term (in order to support deliverability, and engage early with the Local Authority to ensure the comprehensive dialogue takes place with all stakeholders).

It is considered that the policy wording needs to adopt a flexible approach which will still require the same output and principles to be met in meeting the policy requirements. Specifically, the policy wording uses the term 'must' in setting out the requirements of the overall policies, however, it is considered that this can create inflexibility at planning application stage. Accordingly, it is considered that an alternative approach / provision would be more appropriate and justified. As such, the use of the term 'should' is considered more appropriate, which is equally expecting in terms of what is expected as part of the policy provision, but not as absolute.

The following suggested change to the terminology / wording is set out in red text to outline where appropriate wording to policy text should be amended to improve flexibility to the policy. It's considered that amendment will not undermine or materially affect the policy requirements, rather, allow a degree of interpretation by the applicant and decision-maker (The Local Authority).

### *Suggested Policy Wording for Policy GN15, Criterion (D)*

*“All new build residential development on sites of 5 or more units ~~must~~ should provide a minimum of 20% of properties built to Lifetime Homes Standards and in addition, wheelchair user dwellings will be supported”.*

### Justification for Amendment

It is considered that, given the current wording of the text, any subsequent planning application that did not precisely and literally accord with the provisions of the Policy text (as currently worded) would not be in accord with the policy, and by association the Plan, and thereby incompatible. This is as a result of the wording including the term 'must'. Greater flexibility is therefore required to be provided for in the wording.

Whilst the emerging proposals for the site fully expect to deliver the principles and key elements of the GN15 Policy, greater flexibility (or rather less absolute requirement) needs to be allowed for. This reflects the position that the proposals are continually emerging, and will continue to evolve as a result and product of the subsequent planning application process (and consultation responses to that). It also makes allowance for any changes in market circumstances / constraints – which can change over a plan period.

In any event, it is considered that the scheme can meet the Lifetime Home Standards requirements, as the development comprises 14no. bungalows (both 2 and 3-beds), which represents approximately 22% of the overall development. Whilst specific floorplans for the bungalows have not been submitted to-date, it is considered that they can be designed in accordance with the relevant requirements set out in the Lifetime Home Standards. As such, the proposed development as presented would meet the requirements of the Policy to deliver at least 20% that meet the Lifetime Home Standards.

Notwithstanding the above, it is considered that greater flexibility in terms of the wording of the policy is needed – to ensure that residential allocations can come forward in compliance with the Plan period. It is considered to be more

appropriate to appraise the position as and when schemes for each site are presented and assessed, and recognise that some changes may be necessary or merited.

Failure to adjust the language and terminology of the Plan in these respects could have the ability to frustrate the delivery of sites in the Plan.

Moreover, policy wording 'should' rather than 'must' has been accepted and adopted into various policies for other neighbouring authority Plans, including Swansea LDP (adopted 28<sup>th</sup> February 2019), and more recently, in the Bridgend LDP (adopted 13<sup>th</sup> March 2024). It is therefore acknowledged by previous Plans and Inspectors that this wording is appropriate and acceptable.

## Summary

To conclude, and in light of the above, we wish to emphasise that our client, L Greggain and Co Ltd strongly supports the Deposit Plan and the allocation of the site, and is committed to ensuring that the development site can be delivered and contribute towards the wider objective of delivering the opportunity. That said, our client wishes to object to the current wording of Policy GN15 in that a more flexible approach should be undertaken to ensure that allocated sites can be delivered over the course of the Plan period.

We consider that the information contained within this consultation response should provide sufficient evidence to support the approach of the Deposit Plan to retain the site as an allocation for residential development during the Plan period to 2033.

Yours sincerely,



**Geraint John**  
Director  
Geraint John Planning Ltd.



REVISIONS	DATE
P1 - Issued for comment	22nd Mar 2018
First issue for candidate site promotion	22nd Mar 2018
A - Foul Drainage run and easement updated to west boundary, watercourse identified to north-east corner of site. Revisions carried out prior to candidate site promotion	23rd Mar 2018

CAD FILE:

NOTES:

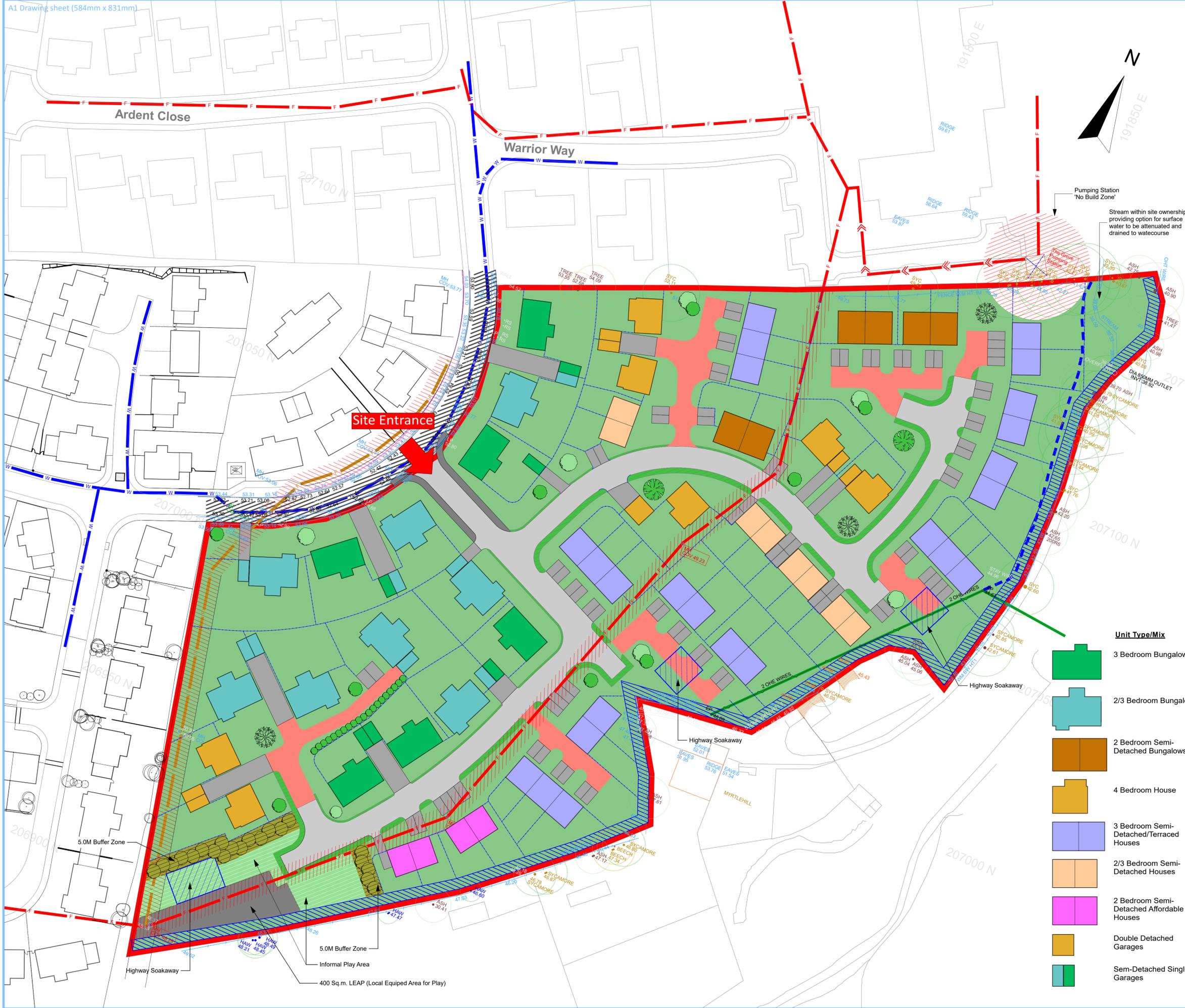
### Legend

- Indicates Development/Site Boundary
- Indicates Proposed Site Entrance
- Indicates Low Voltage Underground Electricity Cable
- Indicates High Voltage Overhead Cable Electricity Cable
- Indicates Foul Drainage Run
- Indicates Rising Main
- Indicates Private Sewers (Transfer)
- Indicates Mains Water Supply
- Indicates 6.0 Metre Easement Zone To Foul Drain
- Indicates 6.0 Metre Easement Zone To Main Water Services
- Indicates 3.0 Metre Ecology Buffer Zone To Be Excluded From Development. Refer To Kite Ecology's Ecological Survey, November 2016
- Indicates assumed 'No Build Zone' associated with pumping station on land off the north boundary which crosses site boundary
- Indicates Trees & Hedgerows, Refer To Ecology Report

Extent of site Area excluding ecology buffer zone and foul waste easement zone  
 = 28380 m<sup>2</sup> Approx  
 = 2.838 HA Approx  
 = 7.01 Acres Approx

Total Number of Unit = 63  
 - 59 Private Units  
 - 4 Affordable Units

- #### Unit Type/Mix
- 3 Bedroom Bungalow
  - 2/3 Bedroom Bungalow
  - 2 Bedroom Semi-Detached Bungalows
  - 4 Bedroom House
  - 3 Bedroom Semi-Detached/Terraced Houses
  - 2/3 Bedroom Semi-Detached Houses
  - 2 Bedroom Semi-Detached Affordable Houses
  - Double Detached Garages
  - Sem-Detached Single Garages



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 Drawing title: Indicative Site Layout Plan  
**R356\_BP-03A**