



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

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

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

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

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

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

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

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

**RHAN A: Manylion cysylltu
PART A: Contact details**

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

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

Enw Name		Owain Griffiths
Teitl swydd (lle y bo'n berthnasol) Job title (where relevant)		Director
Sefydliad (lle y bo'n berthnasol) Organisation (where relevant)	Defence Infrastructure Organisation (DIO)	Avison Young
Cyfeiriad Address	C/o Agent	One Kingsway, Cardiff, CF10 3AN
Rhif ffôn Telephone no		
E-bost Email address		
Llofnodwyd (gallwch teipio) Signed (can be typed)	Owain Griffiths of Avison Young on behalf of the Defence Infrastructure Organisation (DIO)	
Dyddiad	16th December 2024	



Date		
RHAN B: Eich sylw		
PART B: Your representation		
<i>Eich enw / sefydliad</i> Your name / organisation	Defence Infrastructure Organisation (DIO) C/o Agent: Owain Griffiths of Avison Young	
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?		
<i>Rhif(au) polisi Cynllun Datblygu Lleol neu ddyraniad safle</i> LDP policy or site allocation number(s)	Policy SP 2 (Housing Requirement) Policy GN 16 (Residential Allocations) Policy SP 7 (Settlement Boundaries)	
<i>Rhif(au) paragraff y Cynllun Datblygu Lleol neu adran</i> LDP paragraph or section number(s)		
<i>Cyfeiriad(au) Map Cynigion y Cynllun Datblygu Lleol</i> LDP Proposals Map reference(s)	Proposals Map Penally / Penalun	
<i>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.</i> 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>I gael rhagor o wybodaeth am gadernid a gofynion gweithdrefnol, gweler y nodiadau cyfarwyddyd.</i> 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. <i>For more information on soundness and procedural requirements, see the guidance notes.</i>		
<i>Rwyf o'r farn bod y CDLI yn gadarn ac yn bodloni gofynion gweithdrefnol.</i> I think the LDP is sound and meets procedural requirements.		
<i>Rwyf o'r farn nad yw'r CDLI yn gadarn ac y dylid ei newid.</i> I think the LDP is unsound and should be changed.	✓	
<i>Rwy'n credu na chafodd y gofynion gweithdrefnol eu bodloni.</i> 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

Not previously submitted as a Candidate Site but would like to add a new site allocation: Land at Penally Training Camp, Barrack Road, Penally, SA70 7QW.

Cyfeiriad y cais

Site reference

N/A

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.

✓

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.

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.



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/broffion 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.



Pembrokeshire County Council

Local Development Plan 2 (2017 - 2033)

– Deposit LDP 2

Written Representation for an ‘Alternative Site’ for Residential Development on land at Penally Training Camp, Barracks Road, Penally, Pembrokeshire SA70 7QW.

Defence Infrastructure Organisation (DIO)

December 2024

Document Reference: AY/17C300279

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Appendix 4	Illustrative Masterplan Option 2 Medium Density (Drawing Reference: 1102)
Appendix 5	Illustrative Masterplan Option 3 High Density (Drawing Reference: 1103)

1. Preface

- 1.1 This representation has been prepared by Avison Young, on behalf of the Defence Infrastructure Organisation (DIO), as part of the consultation exercise being carried out by Pembrokeshire County Council in respect of the invitation to submit written representations (in this case for an 'alternative site' for residential development) to the Pembrokeshire County Council Local Development Plan 2 (Sept 2024) Deposit LDP2 (2017 – 2033).
- 1.2 This representation is made in respect of land known as Penally Training Camp, Barracks Road, Penally, Pembrokeshire, SA70 7QW. The land subject to this representation falls wholly within the ownership of the Defence Infrastructure Organisation (DIO).
- 1.3 The second Deposit LDP2 identifies a need to deliver 5,840 new homes between 2017 and 2033 (365 a year) including 2,000 new affordable homes (under Policy SP3), and 1,970 new jobs, but with the potential for a further 1,000 plus jobs arising in the initial phases of the Celtic Freeport proposals. We note that a 10% allowance has been applied, increasing the total provision to 6,425 dwellings under Policy SP2 (Housing Requirement) to deliver the housing requirement of 5,840 dwellings. Consultation on the plan runs between 21st October and 16th December 2024. The Plan proposes revised town and village boundaries (known as settlement boundaries) and a range of sites are allocated (identified) for different land uses, including 54 sites for housing.
- 1.4 However, the subject site (hereafter referred to as the "Site") known as Penally Training Camp, Barracks Road, Penally, Pembrokeshire, SA70 7QW, has not been allocated (identified) for residential development nor is it included within the defined settlement boundary for Penally / Penalun.
- 1.5 The Site presents a significant opportunity to deliver sustainable, high quality, new housing (comprising open market and affordable) on vacant previously developed, brownfield, land which is very sustainably located on the edge of an established residential area.
- 1.6 There are concerns that the Plan does not provide sufficient flexibility to deliver the housing requirement during the Plan period. We note that the previous Deposit LDP made provision for 7,820 dwellings which equated to a 15% flexibility allowance to account for any non-delivery or unforeseen circumstances. The latest Deposit LDP 2 has lowered the housing requirement and reduced the flexibility allowance from 15% down to 10% with no apparent justification or reason. This reduced level of housing delivery could result in the loss of younger people from the area and seems at odds with the potential for a further 1,000 plus jobs arising in the initial phases of the Celtic Freeport proposals (as acknowledged under The Strategy in Section 3 of the LDP). For these reasons, this written representation raises an objection to the second Deposit LDP2 as it is considered unsound and should be changed for the following specific reasons:
- The Site has not been allocated (identified) for residential development, and
 - The Site is not included within the defined settlement boundary for Penally / Penalun.
- 1.7 Full details of this proposed 'alternative site' are clearly set out within this written representation and is accompanied by the completed Representations Form and the following supporting information:

- Site Location Plan (Drawing Reference: 1100), at scale of 1:1250 @ A3, prepared by O:AD Studio Limited;
- Constraints Plan (Drawing Reference: 1104), at scale of 1:1000 @ A2, prepared by O:AD Studio Limited;
- Illustrative Masterplan – Option 1 Low Density (Drawing Reference: 1101), at scale of 1:1000 @ A2, prepared by O:AD Studio Limited;
- Illustrative Masterplan – Option 2 Medium Density (Drawing Reference: 1102), at scale of 1:1000 @ A2, prepared by O:AD Studio Limited;
- Illustrative Masterplan – Option 3 High Density (Drawing Reference: 1103), at scale of 1:1000 @ A2, prepared by O:AD Studio Limited;
- Pre-Development Tree Survey & Assessment (Reference: TDA/2994/TS&A/RhC/08.24), prepared by Tirlun Design Associates (TDA) (August 2024);
- Tree Constraints Plan (Reference: TDA/2994/TCP/RhC/08.24), prepared by Tirlun Design Associates (TDA) (August 2024);
- Landscape Character and Visual Impact Assessment (Reference: TDA/2994/LC&VIA/RhC/09.24), prepared by Tirlun Design Associates (TDA) (August 2024);
- Phase 1 Land Quality Assessment (Reference: 62302982-20-1005-WSP-REP-001), prepared by WSP (February 2024);
- Preliminary Ecological Appraisal (Reference: 62302982-20-1008-WSP-REP-002), prepared by WSP (July 2024);
- Phase 1 Transport and Access Assessment (Reference: 62302982-20-1002-WSP-REP-001), prepared by WSP (June 2024);
- Stage 1 Archaeological and Heritage Desk Based Assessment (Reference: 62302982-20-1006-WEX-REP-001), prepared by WSP (March 2024);
- Outline Drainage Statement for Planning (Reference: 35098-HYD-XX-XX-RO-C-0001), prepared by Hydrock, now Stantec;
- Sustainability Appraisal (Reference: 10037212-AUK-XX-XX-RP-TC-0001-P1.2-SA), prepared by Arcadis Consulting (UK) Limited (November 2024), and
- Initial Viability Assessment, and Development Viability Model, prepared by Avison Young.

2. The Alternative Site

Site Introduction

- 2.1 Historically the Site was used primarily as a transit camp for accommodating military personnel training in the area. This included training on the nearby Penally Range, as well as Manorbier Air Defence Range and Templeton Fieldcraft Training Area. The Site was frequently used by cadets and the territorial army (TA) and could accommodate up to 430 troops. In recent history there was no fieldcraft training undertaken on the Site, although the parade square and sports field would have been used for drill.
- 2.2 The buildings were mostly used for accommodation, with additional mess buildings, kitchens, lecture rooms, stores, a laundrette and administrative buildings. The armoury and magazine were in the south of the site, with an indoor range in the centre. A military transport (MT) maintenance section and workshop were located to the west of the parade square, and a Petroleum, Oil and Lubricants (POL) store to the south. Two underground storage tanks (UST) were present in the POL store, historically used to refuel vehicles. There were several minor workshops on the site which were used mostly for minor repairs and maintenance. Several storage buildings were also located around the camp, used for storing equipment, furniture and general camp items. An NBC chamber in the north of the site was used for gas mask training with CS pellets.
- 2.3 The Ministry of Defence has confirmed that the Training Camp is surplus to military requirement. Site presence is now restricted to part-time attendance from maintenance staff to maintain the landscaping and facilities. The Site is vacant and until recently was high-profile owing to being shortlisted for acquisition by the Home Office to provide migrant accommodation. The Home Office has confirmed that it has no interest in acquiring Penally Training Camp. The buildings are mostly empty and some are out of bounds due to the presence of asbestos and it is understood that all services have been disconnected.

Site Context

- 2.4 The Site (as shown on the Site Location Plan in Figure 1 below) extends to some 5.8 hectares (14 acres) and lies at the western edge of Penally, some 2 km to the south-west of Tenby.
- 2.5 The Site comprises previously developed, brownfield, land consisting of a mix of hardstanding areas (including internal non-adopted roads, car park and parade ground), a range of low-rise barrack structures, a former sports pitch, areas of grassland with scattered trees, fronting the A4139.
- 2.6 The land rises steeply to the north with level terraces across the site running east-west. The Site is accessed by two connections from the A4139, with several gates for pedestrian access around the boundary.
- 2.7 The foul water drainage connects to mains sewerage to the south of the site, but due to the electric disconnection the pumping chamber is now manually emptied by a third-party contractor. A gas intake building is located in the north and a substation with a switchgear room nearby.
- 2.8 A demolished sewage treatment works (PTCR00) is located to the south of the A4139 in a grassed area occupying approximately 0.18ha. There is no fence around the boundary, although the vegetation is overgrown around the periphery.

- 2.9 In terms of surrounding land uses, the Site is bordered by residential properties to the east, tourist related development (including caravan parks) to the west, areas of countryside to the north, and grazing land beyond the A4139 to the south.
- 2.10 The Site does not contain any trees subject to tree preservation orders, is not within or adjoining a conservation area, and there are no listed buildings or scheduled ancient monuments within or immediately adjoining the site. The Site does not appear to be subject to any key statutory or locally designated ecological allocations.
- 2.11 The Site is not at risk of flooding. It is located within Flood Risk Zone A as defined by Natural Resources Wales' Development Advice Maps. Furthermore, the site is not considered to be at risk from flooding (Flood Zone 1), according to the Flood Map for Planning.

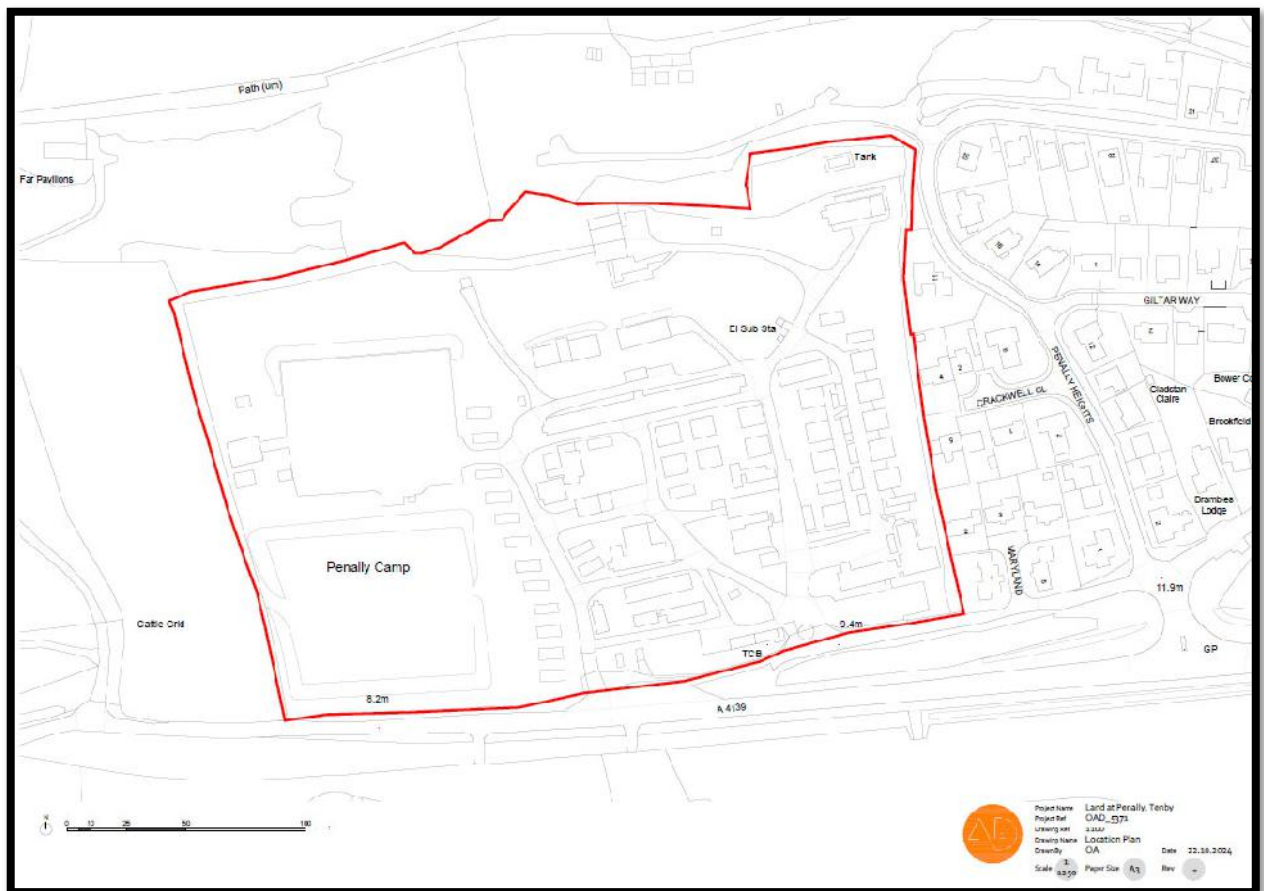


Figure 1: Site Location Plan

Planning History

- 2.12 The Council's online records has identified the following planning history of relevance to the Site at Penally Training Camp, Barracks Road, Penally:
- 13/0852/PA: Demolition of military buildings (linked to 13/0752/PN). Granted 20th January 2014.
 - 13/0880/PN: Demolition of military buildings (linked to 13/0752/PN). Granted 30th January 2014.
 - 13/0752/PN: Demolition of old military buildings. Granted 17th December 2013.

- 00/0266/PA: Notice under Welsh Office Circular 37/84 - Proposed replacement living accommodation. Granted 15th August 2000.
- D3/0120/95: Pitched roof in place of flat roof on Building No. 52. Granted 27th July 1995.

2.13 The Site was used as Temporary Accommodation by the Home Office from September 2020 to March 2021 to house around 250 people while they waited for their asylum claims to be processed (likely to have been permitted under existing use as secure residential accommodation).

3. The Settlement Boundary

- 3.1 The Site is not allocated for any specific land use within the Deposit LDP 2 and falls outside the current proposed settlement boundary for Penally / Penalun, as defined by Policy SP 7 (Settlement Boundaries) and shown on the accompanying Proposals Map for Penally / Penalun, as shown in Figure 2 below.

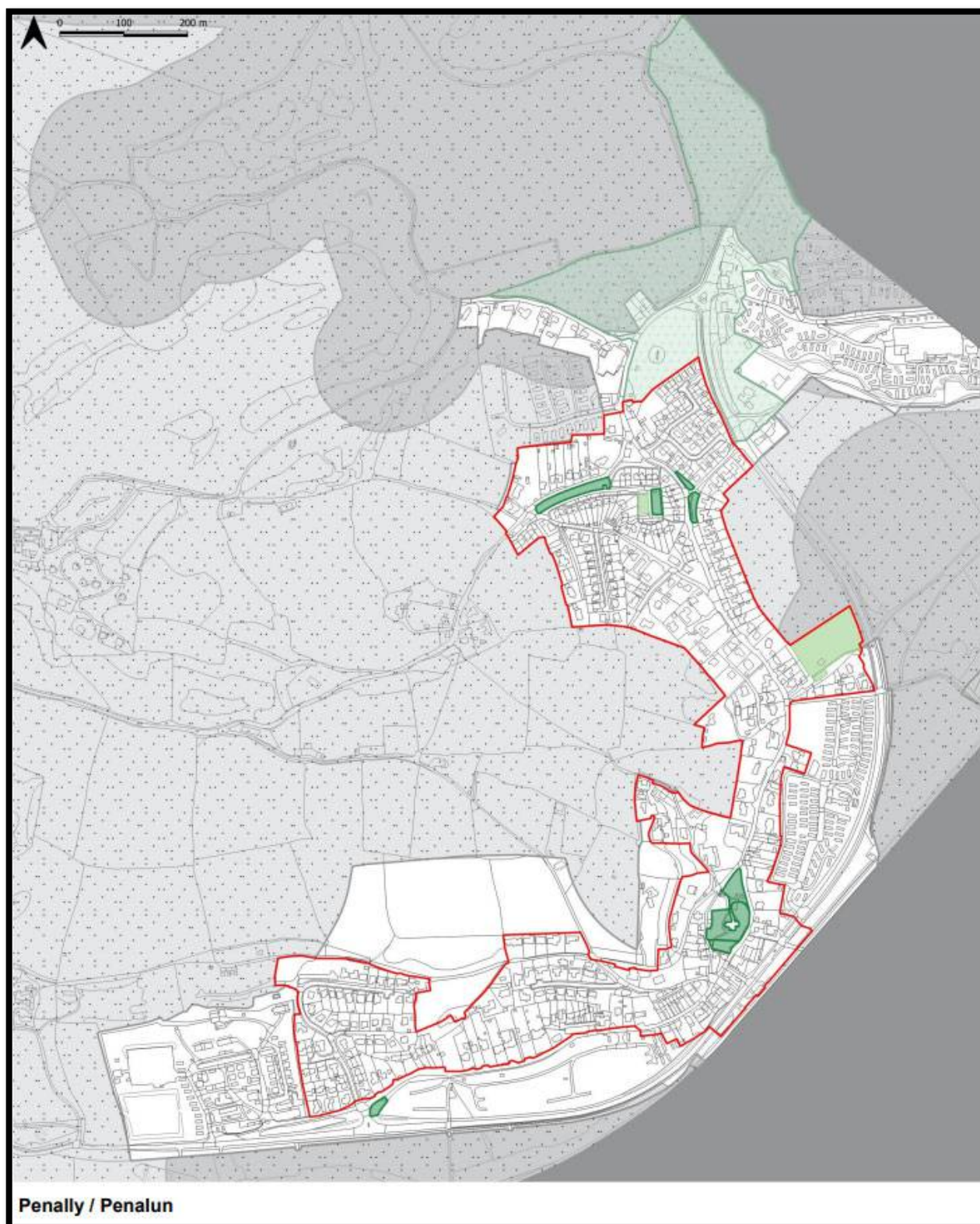


Figure 2: Proposals Map for Penally / Penalun

- 3.2 Policy SP 7 (Settlement Boundaries) stipulates that settlement boundaries are shown for all settlements and define the areas within which development opportunities may be appropriate. In Urban Settlements, Service Centres and Service Villages, Settlement Boundaries define the physical, functional and visual extent of the settlement and take into account proposed allocations. All locations outside Settlement Boundaries are considered to be Countryside locations for land use planning purposes. The supporting text goes on to stipulate that these settlement boundaries ensure that development takes place in sustainable locations and that the natural environment is protected. There are concerns that, if this Site is not allocated for residential development (under Policy GN16) or included within the settlement boundary for Penally / Penalun, this Policy SP7 will limit future opportunities for windfall residential sites.
- 3.3 As can be seen from the above plan, the Site clearly presents a significant opportunity to deliver sustainable, high quality, new housing (comprising open market and affordable) on vacant previously developed brownfield land which is sustainably located on the edge of an established residential area. The Site should therefore, in our considered opinion, be included within an extended Settlement Boundary for Penally / Penalun (defined by Policy SP7 – Settlement Boundaries) and allocated (identified) for residential development under a revised Policy GN16 (Residential Allocations).

4. Site Assessment

Climate Change, Placemaking and Wellbeing

- 4.1 The Welsh Government aims to create a low-carbon society and is investing in “low-carbon infrastructure, renewable energy projects and sustainable homes. Ensuring everyone in Wales can have a high-quality, affordable home is a top priority for the Welsh Government and is key to its commitment of tackling and ending homelessness.
- 4.2 The Welsh Government is committed to building better places, putting placemaking at the heart of future development. The fundamental objective of Planning Policy Wales (Edition 12, January 2021) is to promote sustainable development and improve the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation. The commitment of the Welsh planning system to sustainable development is underpinned throughout the document.
- 4.3 The Site presents a significant opportunity to deliver sustainable, high quality, new housing (comprising open market and affordable) on vacant previously developed, brownfield, land which is very sustainably located on the edge of an established residential area.
- 4.4 The 3 No. Illustrative Masterplans submitted demonstrate how this sustainably located site could be delivered to provide much needed, quality, well designed new homes, and affordable homes, with areas of public open space (including 2 No. LAPs, and SuDs features), whilst appreciating the natural landscape, in line with national and local planning policies for climate change, placemaking and well-being.
- Option 1 (Drawing Reference: 1101) is a low density layout (30 dwellings per hectare) showing 118 units, indicatively comprising of 15 x 2-bedroom link houses, 15 x 3-bedroom link houses, 53 x 3-bedroom detached houses, and 35 x 4-bedroom detached houses.
 - Option 2 (Drawing Reference: 1102) is a medium density layout (37 dwellings per hectare) showing 147 units, indicatively comprising of 25 x 2-bedroom link houses, 32 x 3-bedroom link houses, 21 x 4-bedroom townhouses, 30 x 3-bedroom detached houses, 4 x 4-bedroom semi-detached houses, and 35 x 4-bedroom detached houses.
 - Option 3 (Drawing Reference: 1103) is high density layout (48 dwellings per hectare) showing 188 units, indicatively comprising of 21 x 1-bedroom walk-up flats, 21 x 2- bedroom walk-up flats, 30 x 1 bedroom flats, 30 x 2-bedroom flats, 37 x 3-bedroom link houses, 20 x 3-bedroom detached houses, and 29 x 4-bedroom detached houses.
- 4.5 Within the Deposit Plan, Penally falls within Band 4, where the affordable housing requirement is 40% for 50-99 units. There is no figure for 100+ units so we have assumed 40%. At this early stage of the development process, we have assumed that the tenure type would be split 50:50 between affordable social / intermediate rented tenure.

- 4.6 All three layout options have been informed by a suite of surveys and assessments (which are referred to in further detail below). The main site access will be taken from the A4139, served by adequate visibility splays in both directions, and there will be a pedestrian access from the south-eastern and north-eastern corners of the site ensuring connectivity to the existing settlement. There will be an area dedicated for SuDs along the southern areas of the site, along with areas of green open space and two Local Areas of Play (LAPs) in the central and south-eastern areas of the site.
- 4.7 The sustainable location of the development immediately adjacent to the existing settlement boundary of Penally / Penalun will ensure that all of the residents are integrated within the wider community, thus ensuring that the scheme contributes to a balanced and sustainable community.

Transport

- 4.8 A Phase 1 Transport and Access Assessment (Reference: 62302982-20-1002-WSP-REP-001) has been prepared by WSP and is submitted in support of this 'Alternative Site', providing the necessary information for the Inspector to consider the merits of the Site in terms of location, connectivity, highway safety and the impact on the local highway network.
- 4.9 The Site is currently accessed by two locations, from the A4139, with several gates for foot traffic around the boundary. The site is accessible from the A4139 via a priority controlled T-junction and also through a residential road from the east. The main access point to the Site is located to the west of the neighbouring residential estate road. The access is currently gated and there is a barrier at the entrance.
- 4.10 The nearest train station is Penally Railway Station, around a kilometre to the east, offering regular services both westward to Pembroke Dock and eastward to Swansea and Cardiff, and other locations along the Pembrokeshire coast. Penally is also served by local bus routes, providing links to Tenby and other nearby towns in Pembrokeshire.
- 4.11 The current access road to the main gate becomes narrow from Penally Heights as it approaches the gate. In addition to this access, there is a second gated access to the west, offering excellent visibility and straightforward access directly from the A4139 which is a more suitable access for the Site's residential redevelopment.
- 4.12 The A4139 maintains a national speed limit when approaching from the west, transitioning to a 50mph limit just before Penally train station near the New Overlander Inn. This speed restriction continues along the route to the north-east.
- 4.13 It is considered that the local highway network will have sufficient capacity to accommodate the level of trips generated by the proposed residential redevelopment of the Site. Traffic surveys and junction modelling will be required to undertake detailed assessments to determine the extent of any improvements that may be required.
- 4.14 In addition, the Site will be designed to aid residents who choose to work from home, in accordance with the aspirations of Welsh Government. This will assist in minimising the level of vehicle trips. Electric vehicle charging points or infrastructure will also be provided for each household in accordance with the policies in Future Wales

for increasing electric vehicle use (Policies 11 and 12). This further promotes more sustainable travel to and from the Site.

- 4.15 The Transport and Access Assessment has robustly demonstrated that the Site is appropriate for residential development in connectivity and access terms and suitable for inclusion as an allocated residential site within an extended settlement boundary for Penally / Penalun in the Replacement Local Development Plan.

Heritage / Archaeology

- 4.16 As already noted, the Site is not within or adjoining a conservation area and there are no listed buildings or scheduled ancient monuments within or immediately adjoining the Site. Nevertheless, a Stage 1 Archaeological and Heritage Desk Based Assessment (Reference: 62302982-20-1006-WEX-REP-001) has been prepared by WSP and is submitted in support of this 'Alternative Site'.
- 4.17 While none of these structures hold an official heritage designation, local historians have acknowledged the heritage value associated with the former HQ building and the NAAFI accommodation building. It is noteworthy that a significant proportion of the existing buildings on the Site are currently rated as being in fair-to-poor condition.
- 4.18 In terms of built heritage, the assessment suggest that all the principal components identified should be incorporated and preserved in any future development proposal for the Site. However, it acknowledges that should this not prove feasible, a historic building record should be completed to ensure that they are preserved by record. These works can form part of the post-consent process, as part of a condition on any future planning application.
- 4.19 In terms of archaeology, due to the current uncertain potential for buried archaeological remains within the site, further assessment may be required. This may take the form of an initial non-intrusive survey (geophysics). However, the survey may be hampered by likely presence of services and potential for ferrous material. Geophysical results would be used together with the information in this assessment to complete an archaeological strategy, which may include intrusive evaluation trenching to determine the absence or presence of archaeological deposits. This could be conditioned and dealt with post-determination of a planning application at the discretion of the archaeological advisor to Pembrokeshire County Council.

Landscape

- 4.20 A Landscape Character and Visual Impact Assessment (Reference: TDA/29943/LC&VIA/RhC/09.24) has been undertaken by Tirlun Design Associates (TDA) and is submitted in support of this 'Alternative Site'. The primary question asked of the assessment is: can the proposed Site at Penally Training Camp accommodate a residential development without significant adverse impacts upon the character and visual amenity of the Site's surroundings.
- 4.21 In terms of Landscape Assessment, it is considered that the removal and replacement of the visible existing buildings with new residential properties, would not result in a significant visual change. Furthermore, it is possible that with buildings designed to complement the surrounding architectural vernacular of Penally, and a soft landscape scheme to break up the massing of the proposed buildings, there may be a slight

improvement in the existing view. Views of residential development from the national park are commonplace and a new residential development at Penally Training Camp would not appear out of context or visually incongruous. Furthermore, it is important to note that the existing army camp buildings are visible in all of the viewpoints undertaken as part of the assessment, establishing a visual baseline of built form at the Site.

- 4.22 In terms of Landscape Character Assessment, it is concluded that the proposed development Site, with its existing buildings and hard surfacing, is more visually linked to the suburban character immediately to the east, rather than the more rural character to the north and west. A proposed residential development would therefore be in keeping with this suburban character and would be viewed as a small extension to the village of Penally. Therefore, based on the established landscape character of the Site's immediate setting, the screening provided by a combination of the natural topography of the area and existing trees and vegetation, it is considered that the Site could accommodate a new residential development without unacceptable landscape character or visual amenity impacts upon its immediate setting or the wider landscape.
- 4.23 In summary, whilst it is acknowledged that the Site sits within the setting of the national park, this assessment has established that views of residential properties from the national park are commonplace and are an established part of the park's backcloth.
- 4.24 Overall, it is considered that the Site can accommodate a new residential development without unacceptable landscape character or visual amenity impacts upon its immediate setting or the wider landscape in which it is located. On this basis, it is clear that the proposed residential development of the Site is consistent with relevant planning policies and suitable for inclusion as an allocated residential site within an extended settlement boundary for Penally / Penalun in the Replacement Local Development Plan.

Ecology

- 4.25 A Preliminary Ecological Appraisal (PEA) (Reference: 62302982-20-1008-WSP-REP-002) has been undertaken, by WSP, to establish any habitats and features with potential to support protected and/or notable conservation priority species. This report was prepared in July 2024 and includes a description of the Site's ecological conditions, the ecological context and an appraisal of the Site's ecological value. This is submitted in support of this 'Alternative Site'.
- 4.26 The appraisal concludes that the majority of habitats within the main camp were assessed as having relatively low value for wildlife, with the exception of the areas of high flora biodiversity on the northern boundary which will remain in situ. There is an area of land located south of the subject Site, beyond the A4139, which is deemed to have high potential for wildlife with priority habitat wet woodland being present. The woodland and hedgerow habitats surrounding the Site were assessed as having high ecological value.
- 4.27 The Site was found to have potential to support a range of protected and notable species including bats; breeding birds; amphibians; reptiles; other mammals (hedgehog); terrestrial and aquatic invertebrates; notable flora; and Invasive Non-Native Species (INNS). As such, further survey work is likely to be required to confirm presence and populations of these species, to inform any future ecological impact assessment and identify what necessary impact avoidance and mitigation measures will be required to progress development at the Site. Where impacts on protected species cannot be avoided, licences may also be required to be

sought from Natural Resources Wales (NRW) prior to commencement of the proposed development. In line with national (PPW) and local planning policies, any proposed residential redevelopment would include biodiversity enhancement, which may include the installation of bat and bird boxes; swift bricks; log piles for invertebrates; and retention/creation of dark corridors for nocturnal species such as bats.

Trees

- 4.28 A Pre-Development Tree and Assessment (Reference: TDA/2994/TS&A/RhC/08.24) and a Tree Constraints Plan (Reference: TDA/2994/TCP/RhC/08.24) have been undertaken by Tirlun Design Associates (TDA) and are submitted in support of this 'Alternative Site'.
- 4.29 TDA have undertaken a pre-development survey and assessment of existing trees located on and adjacent to the Site. Recommendations are provided on arboricultural works which should be undertaken in the interests of safety, or as part of sound management practice. The survey, undertaken during July 2024, is illustrated by drawing no. TDA.2902.04 which shows the location and assessed category of surveyed trees. A total of 7 no. individual trees and 3 no. tree groups were surveyed and assessed at the Site.
- 4.30 Of the individual trees, 5 no. were assessed as Category C (Low Quality & Value) and 2 no. were assessed as Category U (Unsuitable for Retention). Of the tree groups, G1, G2 and G3 were assessed as Category C (Low Quality & Value). There are no trees of particular note on Site.
- 4.31 An off-site Ash on the western boundary is infected with *Hymenoscyphus fraxineus* (Ash dieback) and is overhanging the Site. Depending on the proximity of any proposed structures, removal may be necessary.
- 4.32 Following the completion of the Pre-Development Tree Survey and Assessment, TDA were instructed to prepare a Tree Constraints Plan for the Site. The purpose of this plan is to provide an accurate record of above and below ground constraints presented by the existing retained trees. These constraints are illustrated by drawing no. TDA.2994.02 which shows the locations and assessed category of retained trees together with their crown spread, root protection areas (RPA) and shadow patterns.
- 4.33 Where possible, the development proposals for the Site will need to accommodate both the above and below ground constraints illustrated by the Tree Constraints Plan to successfully retain existing trees. Furthermore, development proposals should seek to include adequate space between existing trees and new structures to avoid any future management conflicts/issues. Where removal of existing trees is unavoidable, their loss should be compensated with suitable native species in line with the requirements of PPW12.
- 4.34 This arboricultural information has been used to inform the illustrative masterplan for the Site's proposed residential development.

Ground Conditions

- 4.35 The Site is not affected by any statutory or local designations and is not believed to be within an area identified to be at risk of flooding or coal mining activity. Nevertheless, as there is some possibility of contamination from its former use, a detailed site investigation will therefore need to be undertaken to establish any potential risks and mitigation measures that may be required and to inform the sustainable urban drainage system that would be required.

- 4.36 In the meantime, a Phase 1 Land Quality Assessment (Document Ref: 62302982-20-1005-WSP-REP-001, February 2024) has been undertaken by WSP and is submitted in support of this 'Alternative Site'. The report concludes that there are moderate risks to future residential users from the potential presence of hydrocarbons associated with underground fuel storage tanks; as well as heavy metals, hydrocarbons and asbestos in burning grounds, demolished buildings (including the incinerator, gas hut, range workshops and vehicle repair shop), tips and burning areas, infilled ground, stockpiled bunds and the sewage treatment works; and from potential soil gas from the sewage treatment works, infilled ground and off-site landfill. Moderate/low risks to future residential users have been identified from the potential presence of hydrocarbons associated with the refuelling area. Moderate/low risks to groundwater have been identified from contaminants associated with fuel storage tanks and refuelling areas. All other risks were assessed as low or negligible.
- 4.37 With regard to future development for residential use, a number of contaminant sources exist which will require consideration of further detailed investigation and risk mitigation.

Drainage / SAB

- 4.38 An Outline Drainage Statement for Planning (Reference: 35098-HYD-XX-XX-RO-C-0001) and accompanying engineering plans have been prepared by Hydrock, now Stantec, and are submitted in support of this 'Alternative Site'. The objectives of the report were to:
- Review and identify any constraints which would impact upon the future development of the Site;
 - Review the existing drainage arrangements on Site for both surface and foul water;
 - Assess the feasibility of Sustainable Drainage Systems (SuDS) features within the development to control and discharge surface water runoff to comply with the requirements of the statutory National Standards for Sustainable Drainage Systems;
 - Assess the options for the disposal of foul water from the development; and
 - Provide a preliminary design for surface water (SuDS) systems including indicative sizing of storage/attenuation features and conceptual plan suitable for inclusion in a pre-application submission to the local authority's SuDS Approval Body (SAB)
- 4.39 This preliminary information has been used to inform the illustrative masterplan options for the Site.
- 4.40 The most sustainable method for the disposal of foul water discharge from the proposed development site is via the existing main sewer network. The capacity of the sewer will need to be confirmed by DCWW for the proposed foul flows generated from the site.
- 4.41 The new development will seek to discharge foul flows from the site to the public foul sewer system located within the southern area of the site. All works to the existing public sewer system will need to be agreed with DCWW prior to construction.
- 4.42 All on-site sewerage systems will be designed and constructed to comply with Welsh Building Regulations requirements with any adopted elements in accordance with the latest edition of "Sewers for Adoption" and any of the adopting authority's (DCWW) specific requirements.

- 4.43 The aim of the surface water drainage strategy is to mimic the natural catchment processes as closely as possible and the proposed system will need to be designed in accordance with the statutory (SDSSW) document 2018 and any local authority SAB requirements and CIRIA's C753 SuDS Manual as well as meeting the requirements of Building Regulations, Document H.
- 4.44 Given the proposed site usage, storage could be provided in the form of rain gardens, permeable paving, the feature swales and basins. The main storage feature for the site will be the attenuation basins which will be located at the low points of the site, with SuDs features throughout the development providing further storage upstream of the main features. All drainage features will be developed further at detailed design stage.
- 4.45 The use of a grey water system would not be suitable due to there being periods of very low demand which may result in legionella issues. However, other basic forms of rainwater harvesting could be incorporated into the development in the form of rainwater butts that will collect water from rainwater downpipes and store it for irrigation of the soft landscaped areas and planting beds.
- 4.46 Amenity and biodiversity benefits to the site will be provided in the form of rain gardens, the swale and attenuation basin which will be incorporated throughout the site and also form part of the attenuation storage for the site and, along with the main attenuation basin, these will maximise the available green infrastructure within the development site which will improve air quality and water quality of the site.
- 4.47 All on-site surface water drainage systems will be designed and constructed to comply with the (SDSSW) and building regulations requirements. The current high-level proposals seek to offer sufficient attenuation and flow control in order to provide a 50% betterment/ reduction to the calculated existing brownfield runoff rate. The detailed design of the scheme will incorporate the philosophies outlined in the drainage strategy report.

Flood Risk

- 4.48 Technical Advice Note 15 (TAN15): Development and Flood Risk, published in July 2004, remains the current framework for assessing flood risk to and from new development. A revised TAN15 was due to be implemented in June 2023, supported by the new Flood Map for Planning. However, this remains suspended due to a further consultation on the TAN.
- 4.49 According to the NRW Development Advice Map (DAM), included within Technical Advice Note (TAN) 15, the entire Site is located in Zone A (considered to be at little or no risk of fluvial or coastal/tidal flooding).
- 4.50 The proposed development is for residential development which is classed as Highly Vulnerable. In accordance with TAN15 *Justification Criteria*, highly vulnerable development such as houses should be directed towards land located in Zone A. The entire Site is located in Zone A.
- 4.51 Assessing flooding consequences is not required for development in Zone A. We therefore consider residential development is appropriate with regards to planning policy.
- 4.52 Currently, the Flood Map for Planning has no official status for planning purposes. However, the data can be used as the 'best available information' on flood risk to inform our planning advice.
- 4.53 According to NRW's Flood Map for Planning, the development site falls outside of Zone 2 and 3.

- 4.54 In accordance with Figure 1 of the new TAN15 for new residential development in Zone 1, there are generally no constraints relating to flooding from river or the sea and the Justification Test is not applicable. We therefore consider residential development is also appropriate with regards to the new emerging TAN15 planning policy.
- 4.55 In summary, the Site is not considered to be at risk from flooding.

Welsh Language

- 4.56 Technical Advice Note 20 (Planning and the Welsh Language) seeks to safeguard and promote the interests of the Welsh language through development proposals.
- 4.57 In accordance with this policy context, the impact of the proposal on linguistic character of the surrounding area is a material consideration. The provision of much needed housing, including affordable housing, will provide further opportunities for Welsh speakers to remain in the area. Ysgol Hafan y Môr is a Welsh medium primary school, located some 2.1 miles from the Site. In comparison to the provision of housing elsewhere, the proposed Site could support the enhancement of the role of the Welsh language, through the provision of housing in relative proximity to Welsh medium educational facilities. As such, the proposed residential redevelopment of the Site will not have a detrimental impact upon the needs and intensity of the Welsh language.

Viability & Deliverability

- 4.58 One of the key objectives of the LDP preparation process is to ensure that sites allocated for development represent viable and deliverable opportunities. This is particularly the case for housing development to ensure that the housing land requirements of the LDP can be met.
- 4.59 Avison Young have undertaken an initial viability assessment of the Site's proposed residential development using the Development Viability Model (DVM) provided by the Council which demonstrates that the subject Site represents a viable and deliverable opportunity for residential development that occupies a sustainable location.
- 4.60 This has been based on the Illustrative Masterplan (Option 1 - Drawing Reference: 110) which is a low density layout (30 dwellings per hectare). This suggests a developable area of circa 3.95 hectares (9.76 acres). For the purposes of this hypothetical viability assessment, we have adopted the architect's suggested schedule of accommodation totalling 118 units which equates to circa 30 units per hectare (circa 12 per acre). As already noted, the medium and higher density option Illustrative Masterplans have also been submitted as part of this written representation to demonstrate how the site could potentially accommodate higher density schemes of 147 (Option 2) and 188 (Option 3) units respectively. As the 118-unit scheme is viable, we have assumed that these denser schemes would also meet the profitability threshold. These Masterplans are presented in Appendix 2.
- 4.61 To properly stress test the subject Site's financial viability, we have adopted conservative figures for the GDV and construction costs.

- 4.62 When inputted into the Development Viability Model this produces a profit on GDV figure of £5,378,102 (equivalent to 16.2%).
- 4.63 Therefore, based on this high-level viability assessment and the outputs of the Development Viability Model, it is our opinion that the Site represents a deliverable proposal, based on the current knowledge of the site conditions and our assumptions identified within this report.
- 4.64 The Site is not encumbered by any known legal constraints / covenants and is wholly owned by our client, the Defence Infrastructure Organisation (DIO). It would represent a logical extension to the existing settlement utilising vacant previously developed brownfield land in a sustainable location. As such, its development could be delivered within the Plan period and would make a significant contribution to the housing land supply for the County and the delivery of much needed affordable housing.

Sustainability Appraisal

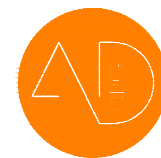
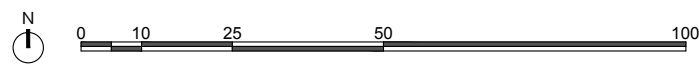
- 4.65 As we are suggesting the inclusion of a new site in the Plan, in addition to the attached Site Location Plan identifying the boundaries of the Site we wish to be included in the Plan along with details of its proposed use, the submission is also accompanied by a Sustainability Appraisal. The information is consistent with the scope and level of detail of the sustainability appraisal conducted by the Local Planning Authority and refers to the same baseline information in identifying the likely significant effects of the new site.
- 4.66 The Sustainability Appraisal (SA) (Reference: 10037212-AUK-XX-XX-RP-TC-0001-P1.2-SA) has been prepared by Arcadis Consulting (UK) Limited and is submitted in support of this 'Alternative Site'. This SA has been written so that its findings can be directly inputted into the Sustainability Appraisal of the Pembrokeshire County Council (PCC) Local Development Plan (LDP2), and its findings compared to the other sites assessed in the SA. It is noted that this is not intended to be a standalone SA Report and is intended to be read alongside the SA Report accompanying the second Deposit LDP2 for consultation 2024.
- 4.67 Overall, it is considered that the proposed Site would lead to potential significant benefits against SA Objectives relating to: Promoting and improving human health and well-being; using land efficiently; maintaining, enhancing and valuing biodiversity and the resilience of ecosystems; and providing a range of high-quality housing including affordable housing to meet local needs. Positive effect have also been predicted against all of the other SA objectives, with the exception of a minor negative score against the objective for waste, as there would inevitably be some waste associated with new development. However, this is unlikely to be significant.

5. Summary

- 5.1 This representation has been prepared by Avison Young, on behalf of the Defence Infrastructure Organisation (DIO), as part of the consultation exercise being carried out by Pembrokeshire County Council in respect of the invitation to submit written representations (in this case for an 'alternative site' for residential development) to the Pembrokeshire County Council Local Development Plan 2 (Sept 2024) Deposit LDP2 (2017 – 2033) and demonstrates that the Site at Penally Training Camp, Penally, has the potential to deliver much needed housing (both open market and affordable housing) during the LDP period.
- 5.2 It is considered that the proposed residential development of this Site would maintain and enhance the extent, quality and connectivity of the multi-functional Green Infrastructure network; would not have a significant adverse effect on the character and quality of the landscape of the area, and would not adversely affect trees, woodlands and hedgerows of public amenity or natural/cultural heritage value.
- 5.3 The site location will encourage and promote sustainable travel behaviour, attract residents who have low car ownership and is in accordance with transport policies in Future Wales, PPW12, TAN18, Active Travel Act and the existing LDP.
- 5.4 The potential development would not have an unacceptable impact on road safety or a material impact on the operation or capacity of the highway network.
- 5.5 Access can be appropriately provided onto the highway network, including for pedestrians and cyclists.
- 5.6 As demonstrated, there are no technical constraints to the Site's residential development. One of the key objectives of the LDP preparation process is to ensure that sites allocated for development represent sustainable, viable and deliverable opportunities. This is particularly the case for housing development to ensure that the housing land requirements of the LDP can be met. The suite of supporting information submitted as part of this written representation, including the Sustainability Appraisal, the Initial Viability Assessment, and Development Viability Model, all demonstrate the credentials of this sustainably located, vacant, previously developed, brownfield site as a worthy 'Alternative Site' for inclusion in the Replacement LDP.
- 5.7 The considerations within this statement provide clear and material justification to extend the settlement boundary of Penally / Penalun (defined by Policy SP7 – Settlement Boundaries) to include this Site and to allocate it in the Replacement LDP for residential development under a revised Policy GN16 (Residential Allocations), which will significantly and positively contribute to the performance of the LDP by utilising a well located, vacant, previously developed, brownfield site to provide a sustainable development opportunity for the delivery of much needed open market and affordable housing.

Appendix I

Site Location Plan



Project Name	Land at Penally, Tenby		
Project Ref	OAD_5371		
Drawing Ref	1100		
Drawing Name	Location Plan		
Drawn By	OA		
Date	22.10.2024		
Scale	1:1250	Paper Size	A3
Rev	-		

Appendix II

Constraints Plan



Project Name Land at Penally, Tenby
 Project Ref OAD_5371
 Drawing Ref 1104
 Drawing Name Constraints Plan
 Scale 1:1000 @ A2

Appendix III

Illustrative Masterplan Option 1 Low Density (Drawing Reference: 1101)

Development Schedule:

Gross Site Area = 5.80 ha
Nett Developable Area = 3.95 ha

Housing Mix:

2 - bedroom link = 15
3 - bedroom link = 15
3 - bedroom detached = 53
4 - bedroom detached = 35

TOTAL = 118 units (30 units/ha)



Project Name Land at Penally, Tenby
Project Ref OAD_5371
Drawing Ref 1101
Drawing Name Illustrative Masterplan _ OPTION 1 low density
Scale 1:1000 @ A2

Appendix IV
Illustrative Masterplan Option 2
Medium Density (Drawing
Reference: 1102)

Development Schedule:

Gross Site Area = 5.80 ha
Nett Developable Area = 3.95 ha

Housing Mix:

2 - bedroom link = 25
3 - bedroom link = 32
4 - bedroom townhouse = 21
3 - bedroom detached = 30
4 - bedroom semi detached = 4
4 - bedroom detached = 35

TOTAL = 147 units (37 units/ha)



Project Name Land at Penally, Tenby
Project Ref OAD_5371
Drawing Ref 1102
Drawing Name Illustrative Masterplan _ OPTION 2 medium density
Scale 1:1000 @ A2

Appendix V

Illustrative Masterplan Option 3 High
Density (Drawing Reference: 1103)

Development Schedule:

Gross Site Area = 5.80 ha
Nett Developable Area = 3.95 ha

Housing Mix:

1 - bedroom walk-up = 21
2 - bedroom walk-up = 21
1 - bedroom flat = 30
2 - bedroom flat = 30
3 - bedroom link = 37
3 - bedroom detached = 20
4 - bedroom detached = 29

TOTAL = 188 units (48 units/ha)



Project Name Land at Penally, Tenby
Project Ref OAD_5371
Drawing Ref 1103
Drawing Name Illustrative Masterplan _ OPTION 3 high density
Scale 1:1000 @ A2

Contact Details

Enquiries

Owain Griffiths

02920 248 920

owain.griffiths@avisonyoung.com

Visit us online

avisonyoung.co.uk

Avison Young

One Kingsway, Cardiff CF10 3AN

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Bob Smith
Rheolwr Cynlluniau Datblygu
Cyngor Sir Penfro
Neuadd y Sir
Hwlfordd
SA61 1TP

13 Rhagfyr 2024

Annwyl Bob,

Cyngor Sir Penfro – Ymgynghoriad ar y Cynllun Datblygu Lleol (CDLI) Newydd – yr Ail Gynllun Adneuo: Ymateb Llywodraeth Cymru

Diolch ichi am ymgynghori â Llywodraeth Cymru ar Gynllun Datblygu Lleol (CDLI) Newydd Cyngor Sir Penfro – yr Ail Gynllun Adneuo. Mae'n hanfodol bod gan yr awdurdod CDLI cyfredol er mwyn rhoi sicrwydd i gymunedau a busnesau lleol a sail gadarn ar gyfer gwneud penderfyniadau.

Heb amharu ar rymoedd y Gweinidog, mae Llywodraeth Cymru'n ymrwymedig i helpu Awdurdodau Cynllunio Lleol (ACLIau) i leihau'r risg o gyflwyno cynlluniau nad ydynt yn gadarn drwy wneud sylwadau cyn gynted â phosibl yn ystod camau paratoi'r cynllun. Mae Llywodraeth Cymru'n chwilio am dystiolaeth glir bod y cynllun yn cydymffurfio'n gyffredinol â Cymru'r Dyfodol: Y Fframwaith Datblygu Cenedlaethol, sy'n gyson â Pholisi Cynllunio Cymru (PCC) a'r profion cadernid, fel y nodir yn Llawlyfr y CDLI.

Nodir y polisiau cynllunio cenedlaethol yn Rhifyn 12 o PCC, sy'n ceisio sicrhau lleoedd cynaliadwy o ansawdd uchel drwy greu lleoedd (dylai'r CDLI sicrhau ei fod yn ystyried unrhyw fersiynau pellach o PCC cyn yr archwiliad. Mae'r meysydd polisi craidd yn PCC, megis mabwysiadu strategaeth ofodol gynaliadwy, lefelau priodol o dai ac o dwf economaidd, darparu seilwaith a chreu lleoedd, yn cael eu disgrifio'n fanylach yn y Llawlyfr ar Gynlluniau Datblygu (Argraffiad 3). **Rydym yn disgwyl i elfennau craidd y Llawlyfr, yn enwedig Pennod 5 a'r 'Rhestr Wirio Cynllun Dadrisgio', gael eu dilyn. Gall methu â chydymffurfio â'r gofynion allweddol hyn arwain at oedi diangen yn ddiweddarach yn y broses o greu'r cynllun.** Caiff y system cynllunio datblygu yng Nghymru ei harwain gan dystiolaeth ac mae dangos sut y caiff cynllun ei lywio gan dystiolaeth yn un o ofynion allweddol y broses o archwilio CDLI.

Ar ôl ystyried y materion a'r polisiau allweddol yn nogfen Cymru'r Dyfodol, mae Llywodraeth Cymru o'r farn bod yr Ail Gynllun Adneuo yn cydymffurfio'n gyffredinol â dogfen Cymru'r Dyfodol: Y Fframwaith Datblygu Cenedlaethol. Mae sylwadau penodol i'w gweld yn y Datganiad o Gydymffurfiaeth Gyffredinol (Atodiad 1). **Mae Atodiad 2 yn nodi sylwadau Llywodraeth Cymru ar faterion penodol a sut maent wedi cael sylw, neu beidio mewn ymateb i'n sylwadau blaenorol.** Gyda'i gilydd, mae ein sylwadau fel a ganlyn:

Atodiad 1 – Cydymffurfiaeth Gyffredinol â dogfen Cymru'r Dyfodol

- Cydweithio Rhanbarthol – Byddai eglurder pellach yn fuddiol

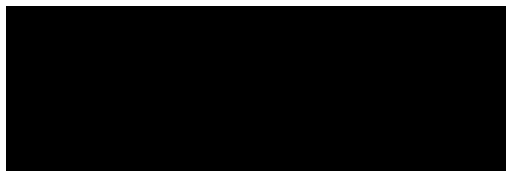
Atodiad 2 – Ymateb cyfredol Llywodraeth Cymru i'r 2^{il} Fersiwn Adneuo o'r CDLI Newydd

- Lefel Twf Tai
- Cyflwyno Safleoedd Allweddol
- Rhagolygon Tai
- Tai Fforddiadwy
- Dosbarthiad Gofodol a Hierarchiaeth Aneddiadau
- Sipsiwn a Theithwyr
- Darpariaeth Cyflogaeth
- Ardal Fenter Dyfrffordd y Ddau Gledau
- Y Tir Amaethyddol Gorau a Mwyaf Amlbwrpas (BMV)
- Ynni Adnewyddadwy a Mwynau

Hoffwn eich annog i geisio'ch cyngor cyfreithiol eich hun er mwyn sicrhau eich bod wedi bodloni'r holl ofynion gweithdrefnol, gan gynnwys yr Arfarniad o Gynaliadwyedd (SA), yr Asesiad Amgylcheddol Strategol (SEA) a'r Asesiad Rheoliadau Cynefinoedd, gan mai cyfrifoldeb eich awdurdod yw'r materion hynny. Dylid bodloni'r gofyniad i gynnal Asesiad o'r Effaith ar Iechyd yn unol â Deddf Iechyd y Cyhoedd (Cymru) 2017, os yw hynny'n briodol, er mwyn asesu effaith debygol y cynllun datblygu arfaethedig ar iechyd, llesiant meddyliol ac anghydraddoldeb.

Mae fy nghydweithwyr a minnau'n edrych ymlaen at gyfarfod â chi a'r tîm i drafod y materion sy'n codi o'r ymateb hwn.

Yn gywir,



Neil Hemington
Prif Gynllunydd, Llywodraeth Cymru

O ran materion sy'n ymwneud â chydymffurfiaeth gyffredinol â dogfen Cymru'r Dyfodol a pholisi cynllunio, cysylltwch â: PolisiCynllunio@llyw.cymru /O ran materion sy'n ymwneud â gweithdrefnau'r Cynllun Datblygu Lleol a chydymffurfio â'r Llawlyfr Cynlluniau Datblygu, cysylltwch â: mark.newey@llyw.cymru a candice.coombs001@llyw.cymru

Mae Llywodraeth Cymru o'r farn bod Ail Gynllun Adneuo Cynllun Datblygu Lleol Newydd Cyngor Sir Penfro (2022-2037) yn cydymffurfio'n gyffredinol â Fframwaith Datblygu Cenedlaethol: Cymru'r Dyfodol, fel y nodir ym mharagraffau 2.16 – 2.18 o'r Llawlyfr Cynlluniau Datblygu (Argraffiad 3).

Mae'r datganiad cydymffurfio hwn yn seiliedig ar y dystiolaeth sydd ar gael ar hyn o bryd. Mae Llywodraeth Cymru yn cefnogi Bargaen Ddinesig Bae Abertawe ond ar hyn o bryd nid yw'n glir sut mae'r rhanbarth ehangach a'r Awdurdodau Lleol cyfagos wedi bod yn rhan o lunio graddfa'r dewisiadau a wnaed yn y cynllun. Byddai'r cynllun yn elwa ar dystiolaeth bellach i ddangos sut mae cydweithio rhanbarthol wedi dylanwadu ar raddfa'r twf yn Sir Benfro.

Atodiad 1 – Datganiad o Gydymffurfiaeth Gyffredinol

Rhesymau

Mae Cymru'r Dyfodol yn gosod pwyslais ar ddatblygu Ardaloedd Twf Rhanbarthol mewn ffordd gynaliadwy. Rhaid i ardaloedd twf gael eu cynllunio mewn ffordd gynaliadwy, rhaid iddynt leihau'r angen i deithio mewn ceir, annog cerdded a beicio (teithio llesol), gwneud y defnydd mwyaf posibl o drafnidiaeth gyhoeddus, a rhaid bod ynddynt seilwaith gwyrdd. Rhaid i ardaloedd twf sicrhau bod yr egwyddorion hyn yn rhan annatod o gonsensws rhanbarthol ehangach, gan ganolbwyntio ar y cyfleoedd y maent yn eu cynnig i hyrwyddo manteision cymdeithasol ac economaidd dros ardal ddaearyddol ehangach. Mae Llywodraeth Cymru yn cefnogi twf cynaliadwy mewn Ardaloedd Twf Rhanbarthol er mwyn ymateb i'r argyfyngau newid hinsawdd a bioamrywiaeth, gan wneud y defnydd gorau o adnoddau.

Mae Polisi 1 a Pholisi 29 Cymru'r Dyfodol yn nodi mai'r ardaloedd twf rhanbarthol sy'n canolbwyntio ar y Trefi Porthladd fydd y prif ffocws ar gyfer twf a buddsoddi yn y rhanbarth, diagram strategol (t145). Mae strategaeth ofodol y cynllun yn cyd-fynd â hyn.

Mae Cymru'r Dyfodol yn cyflwyno safbwynt newydd y mae'n rhaid i bob CDLI ei ystyried o ran pa le sydd i bob cynllun o fewn y rhanbarth cyfan a'r gydberthynas â CDLIau eraill sydd, yn ei hanfod, yn ddull strategol o ymdrin â chydberthnasau trawsffiniol cyn cychwyn Cynllun Datblygu Strategol yn ffurfiol. Mae Llywodraeth Cymru yn cefnogi Bargaen Ddinesig Bae Abertawe gan ddarparu cyfleoedd i ganolbwyntio ar gynyddu ffyniant economaidd drwy gydweithio. Fodd bynnag, **gallai fod yn gliriach sut mae'r rhanbarth ehangach, yn enwedig Awdurdod Parc Cenedlaethol Sir Benfro, Sir Gaerfyrddin a Cheredigion wedi bod yn rhan o'r broses o lywio graddfa'r dewisiadau a wnaed a chytuno arnynt a chanlyniadau unrhyw benderfyniadau a wneir gan Sir Benfro ar gyfer cynlluniau eraill yn y rhanbarth a'r Cynllun Datblygu Strategol yn y dyfodol, gan gynnwys peidio â rhagfarnu opsiynau yn y dyfodol.**

Mae Llywodraeth Cymru yn nodi bod cefndir wedi'i baratoi ar weithio ehangach, ond mae hyn yn ymwneud yn bennaf ag Awdurdod y Parc Cenedlaethol cyfagos ac nid y rhanbarth ehangach. Byddai mynegiant pellach yn helpu i gyfiawnhau'r rôl sydd gan Sir Benfro yn y rhanbarth ac yn cynorthwyo'r broses archwilio. **Nid** mater cydymffurfiaeth gyffredinol yw hwn.

At ei gilydd, (ac yn amodol ar y sylwadau yn Atodiad 2), mae Llywodraeth Cymru o'r farn bod yr Ail Gynllun Adneuo, gan gynnwys maint a dosbarthiad twf, yn cydymffurfio'n gyffredinol â pholisïau allweddol Cymru'r Dyfodol, sy'n cynnwys (ymhlith eraill):

Polisi 1:	Ble bydd Cymru yn tyfu
Polisi 2:	Llywio Twf ac Adfywio Trefol – Creu Lleodedd Strategol
Polisi 6:	Rhoi Canol Trefi yn Gyntaf
Polisi 10:	Cysylltedd Rhyngwladol
Polisi 12:	Cysylltedd Rhanbarthol

Polisiâu 17 ac 18:	Datblygiadau Ynni Adnewyddadwy a Charbon Isel o Arwyddocâd Cenedlaethol
Polisi 29:	Ardaloedd Twf Rhanbarthol – Caerfyrddin a Threfi Porthladd Sir Benfro
Polisi 32:	Dyfrffordd y Ddau Gledau ac Ynni

Mae Atodiad 2 yn esbonio sut yr aethpwyd i'r afael â'n sylwadau blaenorol i'r Cynllun Adneuo cyntaf.

Atodiad 2 – Ymateb cyfredol Llywodraeth Cymru mewn cyferbyniad â'r Cynllun Adneuo blaenorol

Lefel Twf Tai

Mae'r cynllun yn ceisio cyflawni gofyniad o 5,840 o gartrefi a 1,970 o swyddi newydd (ynghyd â 1,000 cychwynnol ychwanegol drwy'r Porthladd Rhydd) dros gyfnod y cynllun o 16 mlynedd, gyda darpariaeth dai ar gyfer 6,425 o anheddau. Comisiynodd yr awdurdod Edge Analytics i ystyried ystod o ragolygon demograffig (gyda phapur diweddarau'r 'Papur Cefndir Gofyniad Tai' a gyhoeddwyd yn 2023) yn seiliedig ar ragamcanion poblogaeth/aelwydydd Llywodraeth Cymru yn 2018 yn ogystal â senarios a oedd yn seiliedig ar anheddau a rhagolwg a oedd yn seiliedig ar gyflogaeth, i fynd i'r afael â phryderon blaenorol Llywodraeth Cymru. Roedd hyn hefyd yn ystyried canlyniadau Cyfrifiad 2021, Asesiad o'r Farchnad Dai Leol 2022 a chanlyniadau arolygon tai blynyddol yr awdurdod.

Mae gofyniad y cynllun o 5,840 o anheddau ym Mholisi SP2 (365/y flwyddyn) yn cyd-fynd yn agos â chyfraddau adeiladu cyfartalog y pum mlynedd diwethaf (413/y flwyddyn – 2014/2019) a'r 10 mlynedd diwethaf (378/y flwyddyn – 2009/2019). Yn Sir Benfro, mae twf naturiol yn negyddol gyda marwolaethau yn uwch na genedigaethau. Mae'r rhagamcanion diweddaraf o aelwydydd sy'n seiliedig ar 2018 yn dangos cyfradd adeiladu ar gyfartaledd o ryw 271 o anheddau/y flwyddyn, gan arwain at gyfanswm o tua 4,336 o anheddau dros gyfnod y cynllun. Mae gofyniad y cynllun wedi'i osod 1,504 yn fwy o anheddau na rhagamcanion 2018.

Nodir y Trefi Porthladd (Hwlffordd, Aberdaugleddau, Penfro a Doc Penfro) yn nogfen Cymru'r Dyfodol (Polisi 29) fel rhan o Ardal Twf Rhanbarthol sy'n cefnogi twf ac adfywio cynaliadwy yng Nghaerfyrddin a Threfi Porthladd Sir Benfro. Bydd yr ardaloedd hyn yn ffocws ar gyfer twf a reolir, gan adlewyrchu eu swyddogaethau isranbarthol pwysig a'u cysylltiadau cryf ag ardaloedd twf cenedlaethol Bae Abertawe a Llanelli. Dylai CDLlau gydnabod y rolau y mae'r lleoedd hyn yn eu chwarae fel ffocws ar gyfer tai, cyflogaeth, twristiaeth, trafnidiaeth gyhoeddus a gwasanaethau allweddol yn eu hardaloedd ehangach a chefnogi eu swyddogaeth barhaus fel canolbwyntiau ar gyfer twf isranbarthol.

- Mae Polisi 10 (Cymru'r Dyfodol) yn nodi Dyfrffordd y Ddau Gledau (gan gynnwys Porthladdoedd Doc Penfro ac Aberdaugleddau) a Phorthladd Abergwaun fel 'porth strategol i hwyluso cysylltedd rhyngwladol'.
- Mae Polisi 32 yn ymwneud yn benodol â Dyfrffordd y Ddau Gledau ac mae'n nodi bod "Llywodraeth Cymru yn cefnogi gweithrediadau Dyfrffordd y Ddau Gledau, ac mae'n cydnabod ei lleoliad ar gyfer datblygiadau, buddsoddiadau a gwaith arloesol ym maes ynni adnewyddadwy a charbon isel newydd posibl".

Gan gyfuno'r polisiâu hyn, yn ogystal â'r angen i gyflawni materion tai fforddiadwy a mynd i'r afael ag anghydbwysedd demograffig, byddai Llywodraeth Cymru yn disgwyl i'r lefel gofynion tai fod yn uwch na rhagamcanion 2018. **Mae Llywodraeth Cymru yn cefnogi gofyniad tai sy'n uwch na rhagamcanion 2018 Llywodraeth Cymru, mater i'r Awdurdod Cynllunio Lleol (ACLI) yw cyfiawnhau'r union lefel.**

Cyflwyno Safleoedd Allweddol

Mae angen i'r cynllun ddangos y gellir cyflwyno'r safleoedd allweddol o fewn cyfnod y cynllun. Mae nifer o safleoedd wedi'u trosglwyddo o CDLI1. I gefnogi cynnwys y safle tai strategol yn Slade Lane South (330 yng nghyfnod y cynllun a 680 arall y tu hwnt i gyfnod y cynllun), byddai'r ACLI yn elwa ar ddarparu Datganiad Tir Cyffredin yn dangos sut mae Pobl (cymdeithas dai) a Llywodraeth Cymru (sy'n berchen ar rannau o'r safle neu sydd â diddordeb cryf ynddynt) ynghyd ag eraill o blaid y syniad ac amseriad pryd y gellir darparu unedau ar lawr gwlad. Mae'r Trywydd Tai (Atodiad 2, Tabl B) yn dangos cyfradd ddosbarthu ddiwygiedig uwch na'r fersiwn adneuo flaenorol sy'n ymddangos yn realistig ac yn gyraeddadwy. **Mae Llywodraeth Cymru yn fodlon bod y sylwadau blaenorol wedi cael sylw ac mae'r cynllun yn cydymffurfio â'r Llawlyfr Cynlluniau Datblygu Drafft (DPM) a'r PCC.**

Y Trywydd Tai

Mae cynnwys trywydd tai, yn ofyniad yn y polisi cenedlaethol (PCC, paragraff 4.2.10). Mae canllawiau ar sut i baratoi llwybr wedi'u cynnwys yn y Llawlyfr Cynlluniau Datblygu Drafft (DPM, Argraffiad 3, ymgynghoriad, Mehefin 2019). Mae Llywodraeth Cymru yn nodi bod y Cynllun adneuo yn cynnwys llwybr ar ffurf tabl a graff (Atodiad 2) a gefnogir.

O ran cynnwys y trywydd, mae Llywodraeth Cymru yn nodi na ddylid cynnwys Hap-safleoedd Mawr a gwblhawyd am ddwy flynedd, yn unol â'r DPM. Er y dylai'r gweddill a gwblheir yn 2033 yn ddelfrydol fod yn sero (Rhes N, 2033), mae 28 uned yn fwy na'r ddarpariaeth ym mholisi SP2. Fodd bynnag, mae hyn yn llai na 0.5% o'r ddarpariaeth gyffredinol ac nid yw'n cael ei ystyried yn bryder. **Mae Llywodraeth Cymru yn fodlon bod y sylwadau blaenorol wedi cael sylw ac mae'r cynllun yn cydymffurfio â'r DPM a'r PCC.**

Tai Fforddiadwy

Mae'r DPM yn nodi bod Asesiad o'r Farchnad Dai Leol (LHMA) yn ddarn craidd o dystiolaeth sy'n nodi lefel a math yr angen am dai mewn ardal. Cyhoeddwyd yr LHMA ym mis Gorffennaf 2021 ac mae'n nodi bod angen 2,832 o gartrefi fforddiadwy (177 o unedau'r flwyddyn) dros gyfnod y cynllun. Mae'r cynllun yn ceisio darparu 2,000 o dai fforddiadwy dros gyfnod y cynllun (polisi SP3, 125/y flwyddyn).

Nid yw'n glir a yw'r 80% o rent cymdeithasol a'r 20% o dai canolradd a brofwyd yn yr asesiad hyfywedd (yn adlewyrchu yn ôl pob tebyg y Papur Crynodeb Ardal blaenorol) yw'r rhaniad cywir o ran deiliadaeth a dylid ei egluro. Gallai hyn effeithio ar ganfyddiadau yn yr asesiad hyfywedd gan gynnwys y targedau tai fforddiadwy ar draws y cynllun ac ar gyfer safleoedd penodol ym Mholisiau GN16 a 20. Byddai eglurder pellach ar y mater hwn yn fuddiol.

Mae Llywodraeth Cymru yn fodlon bod y sylwadau blaenorol wedi cael sylw ac mae'r cynllun yn cydymffurfio â'r DPM a'r PCC, er gydag eglurder ar y rhaniad deiliadaeth a chan osgoi materion yn ymwneud ag asesiadau hyfywedd.

Dosbarthiad Gofodol a Hierarchiaeth Aneddiadau

Nod y strategaeth ofodol yw darparu 60% o gartrefi yn yr ardaloedd trefol (a nodwyd yn Haen 1 o'r hierarchiaeth aneddiadau), a 40% i'r aneddiadau gwledig. Mae hyn yn cael ei rannu fesul haen anheddiad (Atodiad 2, Tabl F). Mae'r Llawlyfr Cynlluniau Datblygu Drafft (Argraffiad 3) yn nodi bod awdurdodau yn cynnwys Tabl 16, 'Crynodeb o ddosbarthiad gofodol tai' i ddangos sut mae holl gydrannau'r cyflenwad (dyraniadau, ymrwymadau a hap-safleoedd) yn ffurfio cyfanswm darpariaeth y cynllun a sut y byddant yn cael eu dosbarthu'n ofodol.

Mae gan y CDLI gyfeiriad sy'n weddill at 'bentrefannau' (paragraff 5.83) y dylid ei ddileu gan na chyfeirir atynt bellach yn yr hierarchiaeth aneddiadau.

Mae Llywodraeth Cymru yn fodlon bod y sylwadau blaenorol wedi cael sylw ac mae'r cynllun yn cydymffurfio â'r DPM a'r PCC.

Safle(oedd) Sipsiwn a Theithwyr

Arweiniodd sylwadau blaenorol Llywodraeth Cymru ar y CDLI adneuo cyntaf at bryderon sylweddol ynghylch diffyg darpariaeth safleoedd i fodloni lefel yr angen a nodwyd. Mae'r sefyllfa hon bellach yn cael ei gwrthdroi. Mae Polisi SP4 y cynllun (ynghyd â pharagraffau 4.20 – 4.23) yn nodi lefel angen o 39 llain dros gyfnod y cynllun. Nodir bod caniatâd cynllunio wedi'i roi ar gyfer 14 llain, gan leihau'r angen gweddilliol i 25 llain yng nghyfnod y cynllun.

Mae Polisi GN24 yn nodi dyraniadau sy'n dod i gyfanswm o 55 llain, 30 llain yn uwch na lefel yr angen. Mae Llywodraeth Cymru yn cefnogi'r polisi hwn gan ei fod yn diwallu'r anghenion a nodwyd yn y cynllun/sylfaen dystiolaeth (Asesiad o Anghenion Llety Sipsiwn a Theithwyr (GTAA) 2019 a gymeradwywyd yn 2024). Er y gallai dyddiad y sylfaen dystiolaeth a'r berthynas â dyddiad yr archwiliad godi cwestiynau, mae Llywodraeth Cymru o'r farn bod digon o hyblygrwydd, h.y. yr orddarpariaeth o leiniau, i roi hyder y bydd lefel yr angen yn cael ei bodloni. **Mae Llywodraeth Cymru yn fodlon bod y sylwadau blaenorol wedi cael sylw ac mae'r cynllun yn cydymffurfio â'r DPM a'r PCC.** Dangosir y dyraniadau ar y map cynigion a bydd angen iddynt ddangos nad oes unrhyw gyfyngiadau arnynt.

Darpariaeth Cyflogaeth

Mae Polisi SP5 yn dyrannu 164.91ha o dir cyflogaeth (y mae elfennau ohono wedi'u cwblhau) sy'n cynnwys 122.16ha ar safleoedd cyflogaeth strategol (Polisi SP14) a 42.75ha ar safleoedd cyflogaeth lleol (Polisi GN9). Mae astudiaeth economaidd y ddwy sir yn nodi bod y rhan fwyaf o'r safleoedd cyflogaeth strategol yn safleoedd allweddol sy'n bodoli eisoes sy'n gysylltiedig â gweithrediadau porthladdoedd. Nid yw'r safleoedd presennol hyn yn ddyraniadau newydd ac fe'u nodwyd mewn polisi diogelu (Polisi SP15) sy'n dod i gyfanswm o 868.57ha. Mae hyn yn cydymffurfio â Thabl 22 o'r Llawlyfr Cynlluniau Datblygu Drafft (Argraffiad 3).

Mae Polisi Darpariaeth Cyflogaeth SP5 yn nodi darparu 1,970 o swyddi dros gyfnod y cynllun, ynghyd â 1,000 o swyddi ychwanegol o'r Porthladd Rhydd Celtaidd, gyda thwf yn cael ei ragweld mewn gwasanaethau iechyd, llety a bwyd a manwerthu. **Mae Llywodraeth Cymru yn fodlon bod y sylwadau blaenorol wedi cael sylw ac mae'r cynllun yn cydymffurfio â'r DPM a'r PCC**

Ardal Fenter Dyfrffordd y Ddau Gledau

Mae Ardal Fenter Dyfrffordd y Ddau Gledau yn Sir Benfro wedi'i dynodi gan Lywodraeth Cymru yn seiliedig ar safleoedd ynni newydd presennol a phosibl. Mae pwysigrwydd yr Ardal Fenter a'r Porthladd Rhydd Celtaidd yn cael eu cydnabod gan yr awdurdod drwy Bolisi SP13 Datblygiad Cysylltiedig â Phorthladd ac Ynni. O ystyried ei phwysigrwydd, rhaid dangos ffiniau'r Ardal Fenter (ynghyd â'r Porth Rhydd Celtaidd o bosibl) ar y Map Cynigion. **Mae Llywodraeth Cymru yn fodlon ei bod yn ymddangos bod y sylwadau blaenorol wedi cael sylw, er byddai'n fuddiol cael eglurhad pellach bod yr holl feysydd gofodol y mae polisi SP13 yn berthnasol iddynt yn cael eu nodi, a thrwy hynny sicrhau bod y cynllun yn cydymffurfio â'r DPM a'r PCC yn fuddiol.**

Y Tir Amaethyddol Gorau a Mwyaf Amlbwrrpas (BMV)

Mae'r polisi cynllunio cenedlaethol yn glir y dylid gwarchod tir amaethyddol o radd 1, 2 a 3a, y tir gorau a mwyaf amlbwrrpas fel adnodd y mae terfyn iddo. Mae Polisi GN1, pwynt 4 yn nodi'r angen am arolwg Dosbarthiad Tir Amaethyddol (ALC). Fodd bynnag, nid yw hyn yn unol â'r siart llif yng nghanllawiau adrannol cyhoeddedig Llywodraeth Cymru – dim ond os yw'r map ALC rhagfynegol yn nodi BMV ar y safle (Gradd 1, 2 neu Isradd 3a) y mae angen arolwg. **Dylid diwygio hyn** (yn unol â'r canllawiau ar y map ALC Rhagfynegol) yn GN1, adran 5.4 ac mewn nifer o ddogfennau eraill (e.e. Meini Prawf Asesu Safleoedd Ymgeisiol a Phapur Pwnc ALC 1 a 2). Nodir Adran 5.6 - Priddoedd (gan gynnwys Mawn) a 'phwysau sylweddol' i bolisi BMV. Fodd bynnag, mae troednodyn 25 bellach wedi dyddio a dylai nawr gyfeirio at fap sgôr tystiolaeth Mawndiroedd Cymru (2022) drwy DataMap Cymru.

Mae angen adolygu Polisi **GN 6 – Adran 5.55** yn unol â'r diweddariadau i Bennod 6 PCC i ystyried effeithiau i briddoedd mawn a chynefinoedd mawndir wrth ddethol safleoedd a gosod seilwaith ar gyfer prosiectau ynni gwynt. Dyma'r prif bwyntiau:

- Defnyddio map sgôr tystiolaeth Mawndiroedd Cymru fel cam cyntaf;
- Ystyried y 'dull fesul cam' (6.4.15 1a a 1b, cynefinoedd na ellir eu hadfer gan gynnwys yr adnoddau naturiol sy'n sail iddynt);
- Ystyried paragraff 6.4.34 ar fawndir.

Mae Llywodraeth Cymru yn croesawu'r cyfeiriad at Synthesis o Dystiolaeth Pridd Llywodraeth Cymru (2022). Mae Llywodraeth Cymru wedi cyhoeddi data ar ansawdd tir amaethyddol (2020) ar gyfer pob ACLI yng Nghymru, ond ni chyfeiriwyd at hyn fel data cefndir ar gyfer y cynllun na gwaith cymhwyso'r polisi. Er bod yr ACLI wedi defnyddio'r Map ALC Rhagfynegol, mae Llywodraeth Cymru wedi darparu gwybodaeth ansawdd tir amaethyddol yn uniongyrchol i ACLI ar gyfer safleoedd sy'n cael eu hystyried, yn ogystal â chyngor ac arweiniad ar ddefnyddio'r Map ALC Rhagfynegol a'r angen i gomisiynu arolygon maes ALC manwl lle mae BMV yn fater i'w ystyried. **Nid yw'n glir sut mae hyn yn cael ei ddefnyddio yn y sylfaen dystiolaeth a'r SA.**

Nid yw'n eglur o ran maint a dosbarthiad priddoedd mawr yn yr ACLI a sut mae'r SA wedi ystyried hyn yn yr asesiad. Mae'r SA yn cyfeirio at y Map Mawndir Unedig (UPM) a gafodd ei ddisodli gan fapiau Sgôr Tystiolaeth Mawndiroedd Cymru yn 2022. Nid yw'n glir beth yw'r adnodd BMV neu fawndir ar gyfer yr ACLI a'r berthynas â'r CDLI.

Mae'r ACLI wedi llunio **Papur Pwnc ALC (Rhan 1 a 2)** a ddylai ddangos yn glir a chrynhofi sut mae polisi BMV wedi'i gymhwyso a'i drafod drwy gydol datblygiad y CDLI – nid dyma'r achos. **Dylid adolygu'r papur** i gynnwys crynodeb o sut mae polisi BMV yn cael ei dystiolaethu a'i gyfiawnhau yn y cynllun, o'r arfarniad cynaliadwyedd, y strategaeth ofodol a'r asesiadau dewis safle ar gyfer dyraniadau a safleoedd ymgeisiol (pa bwysau sydd a roddir i dir BMV; sut mae polisi BMV wedi'i gymhwyso i'r strategaeth ofodol a'r dewis o safleoedd). Nid oes gan yr un o'r safleoedd a ddyrannwyd sy'n ymwneud â BMV (tua 200 Ha?) dystiolaeth a ddarparwyd o waith arolwg maes ALC a wnaed i gadarnhau'r radd hon. **Nid yw hyn yn unol â chanllawiau adrannol a gyhoeddwyd gan Lywodraeth Cymru ac mae angen eu hadolygu. Rhaid i'r Cyngor allu cyfiawnhau yn gadarn unrhyw golled o dir BMV sy'n gysylltiedig â'r dilyniant chwilio yn PCC a'r canfyddiadau yn yr SA.**

Ynni Adnewyddadwy a Mwynau

Mae angen i'r Cyngor egluro'r dewisiadau a wnaed mewn perthynas ag ynni adnewyddadwy a'r llythyr DCPO dyddiedig 1/03/2022 gan y Gweinidog Newid Hinsawdd ar y pryd mewn perthynas â datblygiadau solar ffotofoltaidd a BMV yn ogystal â diweddariadau i Bennod 6 o PCC mewn perthynas â'r 'dull fesul cam' tuag at briddoedd mawr a chynefinoedd mawndir yn ogystal â pharagraff 6.4.34 ynghylch mawndir.

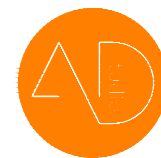
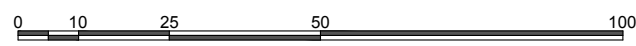
Ar wahân i'r eglurhad hwn, mae Llywodraeth Cymru yn fodlon bod sylwadau blaenorol wedi cael sylw ac mae'r cynllun yn cydymffurfio â'r DPM a'r PCC.

Effeithiau ar y Gymraeg

Mae Polisi SP19 yn nodi ardaloedd o sensitifrwydd o ran y Gymraeg lle mae 18% neu fwy o'r boblogaeth yn siarad Cymraeg. Dylai'r awdurdod esbonio sut nad yw maint y twf tai a gynigir yn y cynllun yn cael effaith andwyol ar y Gymraeg.

Yr Amgylchedd Hanesyddol

Mae adran 5.148 yn cyfeirio at Ddeddf yr Amgylchedd Hanesyddol (Cymru) 2016 ac mae Deddf yr Amgylchedd Hanesyddol (Cymru) 2023 bellach wedi disodli hyn. Hefyd, mae adrannau 5.148 a 5.153 yn cyfeirio at Henebion Hynafol Cofrestredig ond dylent gyfeirio at henebion cofrestredig, yn enwedig gan nad yw Deddf 2023 yn sôn am Henebion Hynafol o gwbl.



Project Name	Land at Penally, Tenby		
Project Ref	OAD_5371		
Drawing Ref	1100		
Drawing Name	Location Plan		
Drawn By	OA		
Date	22.10.2024		
Scale	1:1250	Paper Size	A3
Rev	-		

Development Schedule:

Gross Site Area = 5.80 ha
Nett Developable Area = 3.95 ha

Housing Mix:

2 - bedroom link = 15
3 - bedroom link = 15
3 - bedroom detached = 53
4 - bedroom detached = 35

TOTAL = 118 units (30 units/ha)



Project Name Land at Penally, Tenby
Project Ref OAD_5371
Drawing Ref 1101
Drawing Name Illustrative Masterplan _ OPTION 1 low density
Scale 1:1000 @ A2

Development Schedule:

Gross Site Area = 5.80 ha
Nett Developable Area = 3.95 ha

Housing Mix:

2 - bedroom link = 25
3 - bedroom link = 32
4 - bedroom townhouse = 21
3 - bedroom detached = 30
4 - bedroom semi detached = 4
4 - bedroom detached = 35

TOTAL = 147 units (37 units/ha)



Project Name Land at Penally, Tenby
Project Ref OAD_5371
Drawing Ref 1102
Drawing Name Illustrative Masterplan _ OPTION 2 medium density
Scale 1:1000 @ A2

Development Schedule:

Gross Site Area = 5.80 ha
Nett Developable Area = 3.95 ha

Housing Mix:

1 - bedroom walk-up = 21
2 - bedroom walk-up = 21
1 - bedroom flat = 30
2 - bedroom flat = 30
3 - bedroom link = 37
3 - bedroom detached = 20
4 - bedroom detached = 29

TOTAL = 188 units (48 units/ha)



Project Name Land at Penally, Tenby
Project Ref OAD_5371
Drawing Ref 1103
Drawing Name Illustrative Masterplan _ OPTION 3 high density
Scale 1:1000 @ A2



Project Name Land at Penally, Tenby
Project Ref OAD_5371
Drawing Ref 1104
Drawing Name Constraints Plan
Scale 1:1000 @ A2



Landscape Character and Visual Impact Assessment of Penally Training Camp, Penally

Text, Plans, Photographs & Appendices Prepared

for Defence Infrastructure Organisation

September 2024

TDA/29943/LC&VIA/RhC/09.24

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Appendices

Appendix 1	LCA 21 'Penally'
Appendix 2	Significance Criteria for Visual Impact. Extract of 'Guidelines for Landscape and Visual Impact Assessment produced by The Landscape Institute and Institute of Environmental Management & Assessment.

Section 1

INTRODUCTION

- 1.1 Tirlun Design Associates (TDA) have been instructed to undertake a landscape character and visual impact assessment of a proposed development site at Penally Training Camp, Penally ('The Site'), and assess the general visual and landscape character impacts a proposed new residential development would have upon its surrounding landscape.
- 1.2 Desktop research and site surveys were carried out in August 2024 and their findings are contained herein.
- 1.3 The primary question asked within this document is:

Can the proposed site at Penally Training Camp accommodate a residential development without significant adverse impacts upon the character and visual amenity of the site's surroundings.

- 1.4 The document has been set out as follows:
 - **Section 2 - Qualifications & Experience** introduces the member of staff dealing with this assessment on behalf of TDA and highlights their qualifications and experience relevant to this study.
 - **Section 3 – Penally: Planning Context & Landscape Character** introduces the site, its planning context and landscape character.
 - **Section 4 – Landscape Mitigation & Enhancement** outlines the structural landscape strategy for the residential development
 - **Section 5 - Visual Appraisal & Landscape Assessment** is a visual appraisal and landscape assessment of the site.
 - **Section 6 - Summary & Conclusion** provides a summary of the study and presents a conclusion to the question raised within paragraph 1.3.

Section 2

QUALIFICATIONS & EXPERIENCE

- 2.1 This assessment has been carried out on behalf of TDA by Rhodri Crandon and Andrew Perrigo.
- 2.2 Rhodri's qualifications include an honours degree in Landscape Architecture gained from Cheltenham & Gloucester College of Higher Education (CGHE) and a Post Graduate Diploma in Landscape Architecture also from CGHE.
- 2.3 Mr. Crandon is the director of TDA, a landscape consultancy practice based in South Wales, and has 21 years professional practice experience within the field of landscape architecture. Over this period, he has undertaken many projects relevant to this development which have dealt with issues relating to landscape design, landscape planning and landscape & visual assessment.
- 2.4 Mr. Crandon has worked as an expert witness in relation to landscape character and visual issues on many relevant projects both in the private and public sector, including Monmouthshire County Council during their Unitary Development Plan Inquiry in 2004.
- 2.5 Andrew's qualifications include an honours degree in Psychology gained from Cardiff Metropolitan University, a City & Guilds Level 2 in Computer Aided Design and a Post Graduate Diploma in Landscape Architecture from the University of Gloucestershire.
- 2.6 Mr. Perrigo is the Senior Landscape Architect at TDA, and has 18 years professional practice experience within the field of landscape architecture. Over this period, he has undertaken many projects relevant to this development which have dealt with issues relating to landscape design, landscape planning and landscape & visual assessment.

Section 3

PENALLY: SITE, LANDSCAPE, PLANNING CONTEXT AND LANDSCAPE CHARACTER

Site Context

- 3.1 The site is a disused army training camp. The eastern portion contains numerous dormitory and administrative buildings with associated car parking and footpaths. The western portion of the site comprises a 400 square metre hard surface parade ground and a 7000 square metre area of amenity grassland. The total site area is approximately 5.1 hectares.
- 3.2 It is defined by dense Willow and Sycamore on the sloped ground immediately to the north, residential properties on Crackwell Close and Maryland to the east, the A4139 to the south and a field boundary hedgerow to the west.
- 3.3 TDA drawing no. TDA/2994/03 – Location of Photo Viewpoints (refer to Plans section of this document) clearly illustrates the site and its context.

Landscape & Planning Context

- 3.4 The site is located on the western fringe of Penally, 520 metres to the south west of the Penally Conservation Area.
- 3.5 The site is not covered by any specific landscape designations.
- 3.6 It is located outside, but within the setting of, the Pembrokeshire Coast National Park, approximately 160 metres north of the park boundary.
- 3.7 The Wales Coast Path passes the site approximately 330 metres to the south (refer to TDA drawing no. TDA/2994/03 – Site Location & Photo Viewpoints).
- 3.8 Based upon the study of up-to-date mapping provided by Sustrans, there are no National Cycle Routes within close proximity of the site.
- 3.9 The site does not contain any trees subject to tree preservation orders, listed buildings or scheduled ancient monuments. The First World War Practice Trenches scheduled monument is located approximately 350 metres to the south.

Adopted Local Plan Policies

Policy GN.1 – General Development Policy (Pembrokeshire County Council Local Development Plan 2013)

3.10 Policy GN1 states that:

“Development will be permitted where the following criteria are met:

- 1. The nature, location, siting and scale of the proposed development is compatible with the capacity and character of the site and the area within which it is located;*
- 2. It would not result in a significant detrimental impact on local amenity in terms of visual impact, loss of light or privacy, odours, smoke, fumes, dust, air quality or an increase in noise or vibration levels;*
- 3. It would not adversely affect landscape character, quality or diversity, including the special qualities of the Pembrokeshire Coast National Park⁶³ and neighbouring authorities;*
- 4. It respects and protects the natural environment including protected habitats and species;*
- 5. It would take place in an accessible location, would incorporate sustainable transport and accessibility principles and would not result in a detrimental impact on highway safety or in traffic exceeding the capacity of the highway network;*
- 6. Necessary and appropriate service infrastructure, access and parking can be provided;*
- 7. It would not cause or result in unacceptable harm to health and safety”*

Policy GN.2 – Sustainable Design (Pembrokeshire County Council Local Development Plan 2013)

3.11 Policy GN2 states that:

Development will be permitted where relevant criteria are met:

- 1. It is of a good design which pays due regard to local distinctiveness and contributes positively to the local context;*
- 2. It is appropriate to the local character and landscape/ townscape context in terms of layout, scale, form, siting, massing, height, density, mix, detailing, use of materials, landscaping and access arrangements / layout;*
- 3. It incorporates a resource efficient and climate responsive design through location, orientation, density, layout, land use, materials, water conservation and the use of sustainable drainage systems and waste management solutions;*
- 4. It achieves a flexible and adaptable design;*
- 5. It creates an inclusive and accessible environment for users that addresses community safety;*
- 6. It provides a good quality, vibrant public realm that integrates well with adjoining streets and spaces and*
- 7. It contributes to delivering well designed outdoor space with good linkages to adjoining streets, spaces and other green infrastructure.*

Policy GN.37 – Protection & Enhancement of Biodiversity (Pembrokeshire County Council Local Development Plan 2013)

3.12 Policy GN.37 states that:

“All development should demonstrate a positive approach to maintaining and, wherever possible, enhancing biodiversity.

Development that would disturb or otherwise harm protected species or their habitats, or the integrity of other habitats, sites or features of importance to wildlife and individual species, will only be permitted in exceptional circumstances where the effects are minimised or mitigated through careful design, work scheduling or other appropriate measures”.

3.13 Consequently, from a landscape perspective, providing the development:

- Does not have a significant detrimental impact on local amenity in terms of visual impact
- Does not adversely affect landscape character, quality or diversity
- respects and protects the natural environment
- Maintains and, where possible, enhances biodiversity
- Is compatible with the capacity and character of the site and the area within which it is located
- Is appropriate to the local character and landscape/ townscape context

Then it is consistent with the planning policies listed above.

Landscape Character

LANDMAP – The Countryside Council for Wales

- 3.14 The Countryside Council for Wales, now Natural Resources Wales, has undertaken an extensive landscape character assessment of Wales using the LANDMAP information system.
- 3.15 LANDMAP is a GIS (Geographical Information System) based landscape resource where landscape characteristics, qualities and influences on the landscape are recorded and evaluated into a nationally consistent data set.
- 3.16 Specialists collect LANDMAP Information in a structured and rigorous way that is defined by five methodological chapters, the Geological Landscape, Landscape Habitats, Visual & Sensory, Historic Landscape and Cultural Landscape. Each of these elements and how they assess the site and its surroundings (including principal management recommendations and long-term guidelines) are further explored below:

Geological Landscape

- 3.17 With regards to its Geological Landscape, LANDMAP has located the site within the 'St. Florence' aspect area. It states that the area, which is classified as being of high value, consists of area with low topography, often virtually flat, but rising gently to S towards "Old Red Sandstone" escarpment.
- 3.18 The principal management recommendation and long-term guidelines for this area is to ensure that no features of geological or geomorphological significance are lost or damaged due to development.

Landscape Habitats

- 3.19 With regards to Landscape Habitats, LANDMAP has located the site within the 'N.E. of Saundersfoot' aspect area. It states that the area is of moderate value, consisting mostly of low value habitat (improved grassland).
- 3.20 The principal management recommendations and guidelines for his area are to preserve areas of woodland and scrub.

Historic Landscape

- 3.21 The Historic Landscape element of the LANDMAP assessment locates the site within the 'Penally' aspect area. This area has been classified as high value and comprises the built-up area of Penally, which is a small, handsome, stone-built nucleation clustered around a listed medieval church. Most of the village comprises 18th - 20th century ribbon development along the former main road through the village, although there are also some sub-medieval houses, and a building which was probably a medieval hall-house. Many of these properties are listed buildings
- 3.22 There are no principal management recommendations or guidelines.

Cultural Landscape

- 3.23 The Cultural Landscape element of the LANDMAP assessment is not available.

Visual & Sensory

- 3.24 Finally, the visual and sensory element of the LANDMAP assessment locates the site within the 'Penally' aspect area. This area has been classified as moderate value and is a relatively common settlement type comprising a mid-sized village which curves around the landform at its attractive location within the coastal aspect. Set against a small wooded hillside within a wider coastal farmland landscape. Penally has a low development level and a strong coastal association. The main road, driveway and caravan park act as minor detractors.
- 3.25 The principal management guideline is to retain and, where opportunities exist, enhance the traditional aspects of the village.

Pembrokeshire County Landscape Character Assessment (2019- updated 2022)

- 3.26 Based on the LANDMAP information system methodology above, Pembrokeshire County Council has undertaken an extensive landscape character assessment of the county. The results of this study are summarised by the 'Pembrokeshire County Landscape Character Assessment', produced by White Consultants, 2019 (updated 2022).
- 3.27 Using this methodology Pembrokeshire is divided into 29 landscape character areas. The site falls within Landscape Character Area 21 – 'Penally' (Refer to Appendix 1).
- 3.28 The landscape assessment describes the overall character of the 'Penally' as:

"A distinctive and prominent east west ridge top and slopes falling north to the flat bottomed Ritec valley with marshland and slopes to the east falling south to the settlement of Penally with its Conservation Area and associated low lying land just behind coast within the National Park. The area is primarily pastoral with patches of broadleaved woodland on steep slopes".

- 3.29 The key landscape guidelines the LCA are listed as follows:

- ***Conserve and enhance the heathland and moorland character of Frenni Fawr and Frenni. Avoid development on ridge skyline and slopes both to the south expanding Penally and to the north in the rural hinterland. The higher up the slope the more sensitive development is and extensions around Penally Heights to the north, east and west should be avoided.***
- ***Maintain the separation between Penally and Kiln Park/Tenby and avoid expansion into the area eroding the separation and the open setting from the Coast Path.***
- ***Avoid any development south and east of the A4139 coast road which tightly defines the housing and leisure developments associated with Penally.***
- ***Improve and soften the built edges of Penally with appropriate planting and green space.***
- ***Encourage broadleaved woodland and trees in hedgerows to reinforce the enclosure and contain built development at lower levels.***
- ***Conserve and enhance hedgerows to maintain the landscape pattern laying if outgrown and avoid use of post and wire if possible.***
- ***Follow County guidance on caravan, chalet and camping development for the area.***
- ***Control the spread of grey willow into valuable grassland habitats.***
- ***Avoid wind energy and solar energy on the ridge and slopes to avoid adverse effects on the National Park and the area to the north.***
- ***Future solar energy should be well contained by trees and hedgerows from key views.***

- ***Accommodate flooding with resilience measures and habitat adaptation.***

- 3.30 Following a more detailed site-specific visual appraisal and landscape assessment carried out in August 2024 (refer to Section 4) it can be confirmed that the summaries made by LANDMAP and the Pembrokeshire County Landscape Character Assessment are a broadly accurate description of the site's immediate setting. However, it should be noted that much of the LANDMAP survey focuses the village centre of Penally, that is covered by the Penally conservation area, rather than the areas further to the west, where the site is located.
- 3.31 Indeed, the site sits in a relatively flat landscape between the ridge line to the north and the Pembrokeshire Coast National Park to the south.
- 3.32 The landscape to the north and west comprises a network of arable fields defined by field boundary hedgerow. The holiday parks between Penally and Lystep disrupt this landscape pattern, however they are relatively well screened from the wider landscape.
- 3.33 The landscape to the east comprises housing along the lower ridge slopes and is suburban in character. There is a large campsite to the east, however it is generally well screened by field boundary hedgerows.
- 3.34 The landscape to the south comprises the open, coastal plateau of the Pembrokeshire Coast National Park. The park is separated from the site and wider Penally by the coastal Road (A4139) and adjacent railway line.

Section 4

LANDSCAPE MITIGATION & ENHANCEMENT

4.1 Landscape mitigation and enhancement proposals will be developed to sensitively integrate the development into the landscape (refer to TDA.2994.04 for details). Proposals will include:

- The retention of all existing field boundary hedgerows and associated hedgerow trees wherever possible.
- The infilling of any gaps / thin spots within existing hedgerows to conserve and enhance existing landscape features
- Allowing selected superior hedgerow plants to grow on as hedgerow trees.
- New native tree planting to improve the site's arboricultural character.
- New multifunctional public open spaces for residential amenity and ecological enhancement.

The primary function of the landscape proposals will be to enhance biodiversity and to maintain and enhance links to the wider green infrastructure network.

Section 5

VISUAL APPRAISAL & LANDSCAPE ASSESSMENT

Assessment Methodology

- 5.1 The following section has been produced in accordance with the 'Guidelines for Landscape and Visual Impact Assessment (3rd Edition)' produced by The Landscape Institute and Institute of Environmental Management & Assessment (2013).

Desktop Assessment

- 5.2 In addition to the research undertaken to establish the site's landscape/planning context and landscape character described in Section 3, a desktop assessment of the site was undertaken to identify local visual receptors.
- 5.3 Drawing no. TDA/2994/03 – Location of Photo Viewpoints, located in the Plans section of this document, clearly identifies local visual receptors (including areas accessible to the general public.)

Visual Appraisal

- 5.4 As a consequence of the assessment described above, photo viewpoints were carefully selected to represent the development's possible impacts upon visual receptors located within surrounding area.
- 5.5 For document clarity and ease of interpretation views are categorised according to their distance from the site as follows:
- Short-range – 0-0.5 kilometres from the nearest site periphery.
Mid-range – 0.5-1.0 kilometres from the nearest site periphery.
Long-range – 1.0+ kilometres from the nearest site periphery.
- 5.6 The significance of the development's impact upon existing views from areas accessible to the general public has been assessed using the significance criteria for visual impact included in Appendix 2. The visual impact of the proposed development upon each photo viewpoint is described in *italics* below.
- 5.7 Due to its position within the landscape, the existing residential properties of Penally and existing hedgerows and trees; the site is not visually prominent from much of the wider landscape.

Photo Viewpoints

5.8 Photo viewpoints 1-7 below can be found in the Photographs section of this document. Their locations and view angles are illustrated by TDA drawing no. TDA/2994/01 – Location of Photo Viewpoints, located in the Plans section of this document.

5.9 **Photo Viewpoint 1** is a short-range view looking south west from a public footpath between Hill Farm and Crack Farm. The site is partially screened by intervening trees. Some of the existing training camp buildings are visible.

Development's visual impact: Slight Adverse / Slight Beneficial

5.10 **Photo Viewpoint 2** is a short-range view looking south east from a public footpath between Hill Farm and Crack Farm. The site is screened by intervening topography and field boundary hedgerows.

Development's visual impact: no change

5.11 **Photo Viewpoint 3** is a short-range view looking south from a public footpath to the south of the Ridgeway. The site is screened by intervening topography.

Development's visual impact: no change

5.12 **Photo Viewpoint 4** is a Short-range view looking north from the Wales Coast Path. The eastern section of the site, containing the majority of the existing buildings, is visible. The western section of the site is partially screened by existing trees.

Development's visual impact: Moderate Adverse

5.13 **Photo Viewpoint 5** is a mid-range view looking north east from the Wales Coast Path. The western open portion and upper parts of the site are visible.

Development's visual impact: Moderate Adverse

5.14 **Photo Viewpoint 6** is a mid-range view looking north from the Wales Coast Path. The site is predominantly screened by intervening topography

Development's visual impact: Slight Adverse.

5.15 **Photo Viewpoint 7** Long-range view looking north east from the Wales Coast Path. The site is screened by intervening topography

Development's visual impact: no change

Landscape Assessment

5.16 The visual appraisal has established that the site is visible from viewpoints 1, 4, 5 and 6.

5.17 With regards to viewpoint 1, It is considered that the removal and replacement of the visible existing buildings with new residential properties, would not result in a significant visual change. Furthermore, it is possible that with buildings designed to complement the surrounding architectural vernacular of Penally, and a soft landscape scheme to break up the massing of the proposed buildings, there may be a slight improvement in the existing view.

5.18 With regards to viewpoints 4, 5 and 6, there are extensive views of existing residential development from these viewpoints, stretching from the site boundary, along the ridgeline to the east and as far as Tenby in the distance. Consequently, views of residential development from the national park are commonplace and a new residential development at Penally training camp would not appear out of context or visually incongruous.

5.19 Furthermore, it is important to note that the existing army camp buildings are visible in all of these viewpoints, establishing a visual baseline of built form at the site.

Landscape Character Assessment

5.20 It is clear from the above assessment that the proposed development site, with its existing buildings and hard surfacing, is more visually linked to the suburban character immediately to the east, rather than the more rural character to the north and west.

5.21 A proposed residential development would therefore be in keeping with this suburban character and would be viewed as a small extension to the village of Penally.

5.22 Consequently, based on the established landscape character of the site's immediate setting, the screening provided by a combination of the natural topography of the area and existing trees and vegetation, it is considered that the site could accommodate a new residential development without unacceptable landscape character or visual amenity impacts upon its immediate setting or the wider landscape.

Section 6

SUMMARY & CONCLUSIONS

Summary

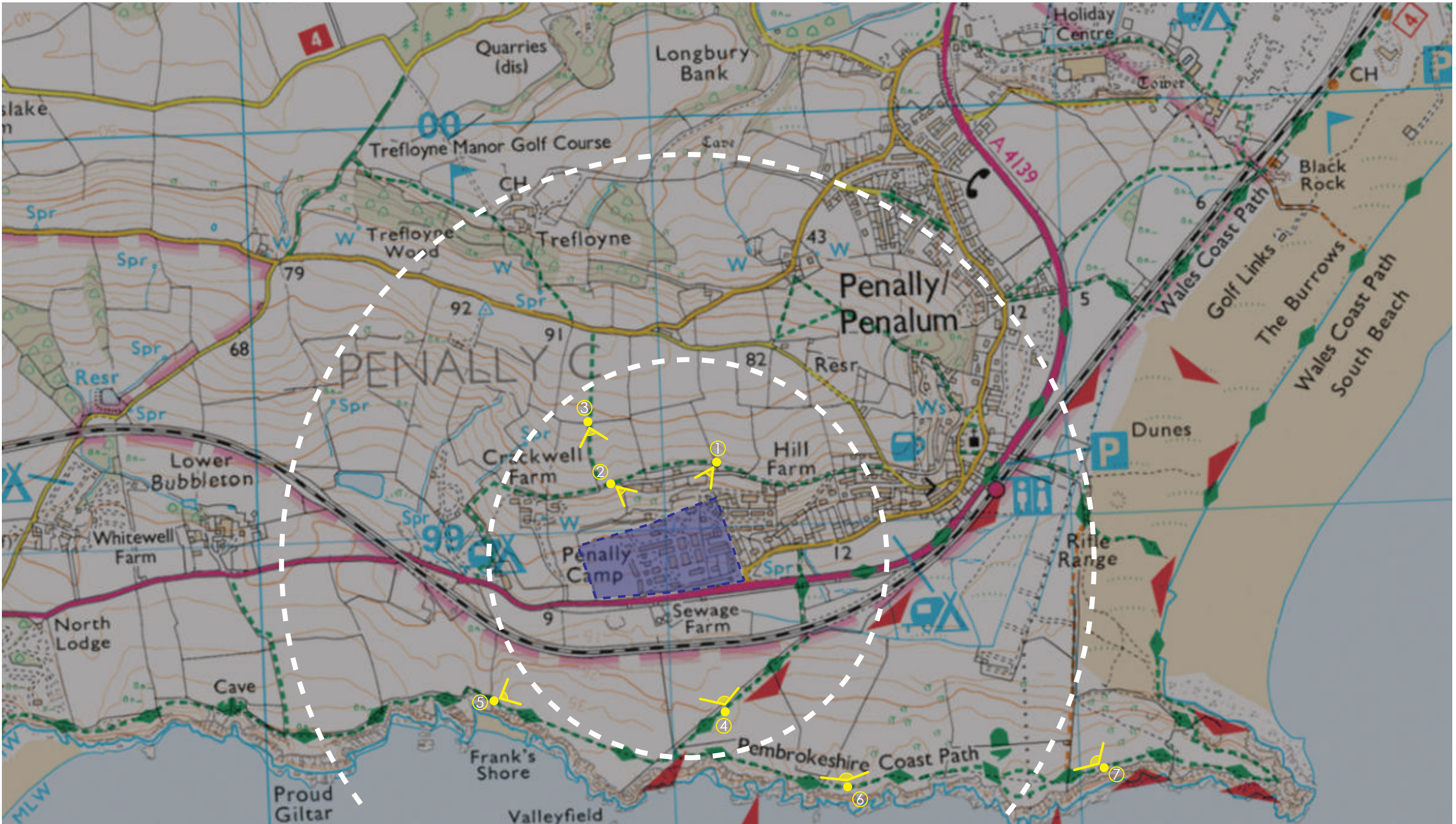
- 6.1 In assessing whether the site at Penally can accommodate a new residential development without impacting upon the surrounding landscape this study has:
- Undertaken a desktop assessment of the site's landscape/planning context and landscape character during August 2024;
 - Undertaken an on-site visual appraisal and landscape assessment during August 2024.
- 6.2 Section 1 of this document identified a key question in relation to the site, this being:
- Can the proposed site at Penally Training Camp accommodate a residential development without significant adverse impacts upon the character and visual amenity of the site's surroundings.**
- 6.3 This section of the document will summarise the assessments findings in helping to answer the question.
- 6.4 Firstly Section 3 established that, providing the proposed development does not have a significant detrimental impact on local amenity in terms of visual impact, does not adversely affect landscape character, quality or diversity, respects and protects the natural environment, maintains and, where possible, enhances biodiversity, is compatible with the capacity and character of the site and the area within which it is located, and is appropriate to the local character and landscape/ townscape context. Then it is consistent with planning policies GN.1, GN.2 and GN.37 of the Pembrokeshire County Council Local Development Plan.
- 6.5 Secondly, Section 4 – Landscape Mitigation & Enhancement described how biodiversity and screening of the site will be enhanced through a carefully designed landscape strategy.
- 6.6 Thirdly, Section 5 - Visual Appraisal & Landscape Assessment established that the site is screened by a combination of the natural topography of the area and existing trees and vegetation. Where the site is visible, its is viewed in the context of existing residential development and the established suburban character of its immediate setting.

Conclusion

- 6.7 Whilst it is acknowledged that the site sits within the setting of the national park, this assessment has established that views of residential properties from the national park are commonplace and are an established part of the park's backcloth.
- 6.8 Overall, it is therefore considered that the site can accommodate a new residential development without unacceptable landscape character or visual amenity impacts upon its immediate setting or the wider landscape in which it is located.

PLANS

TDA/2994/01	Location of Photo Viewpoints
TDA/2994/02	Structural Landscape Strategy



Key



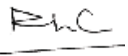
Location of Site



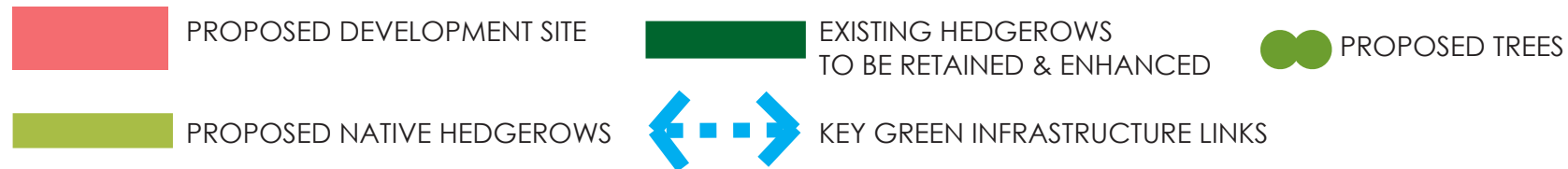
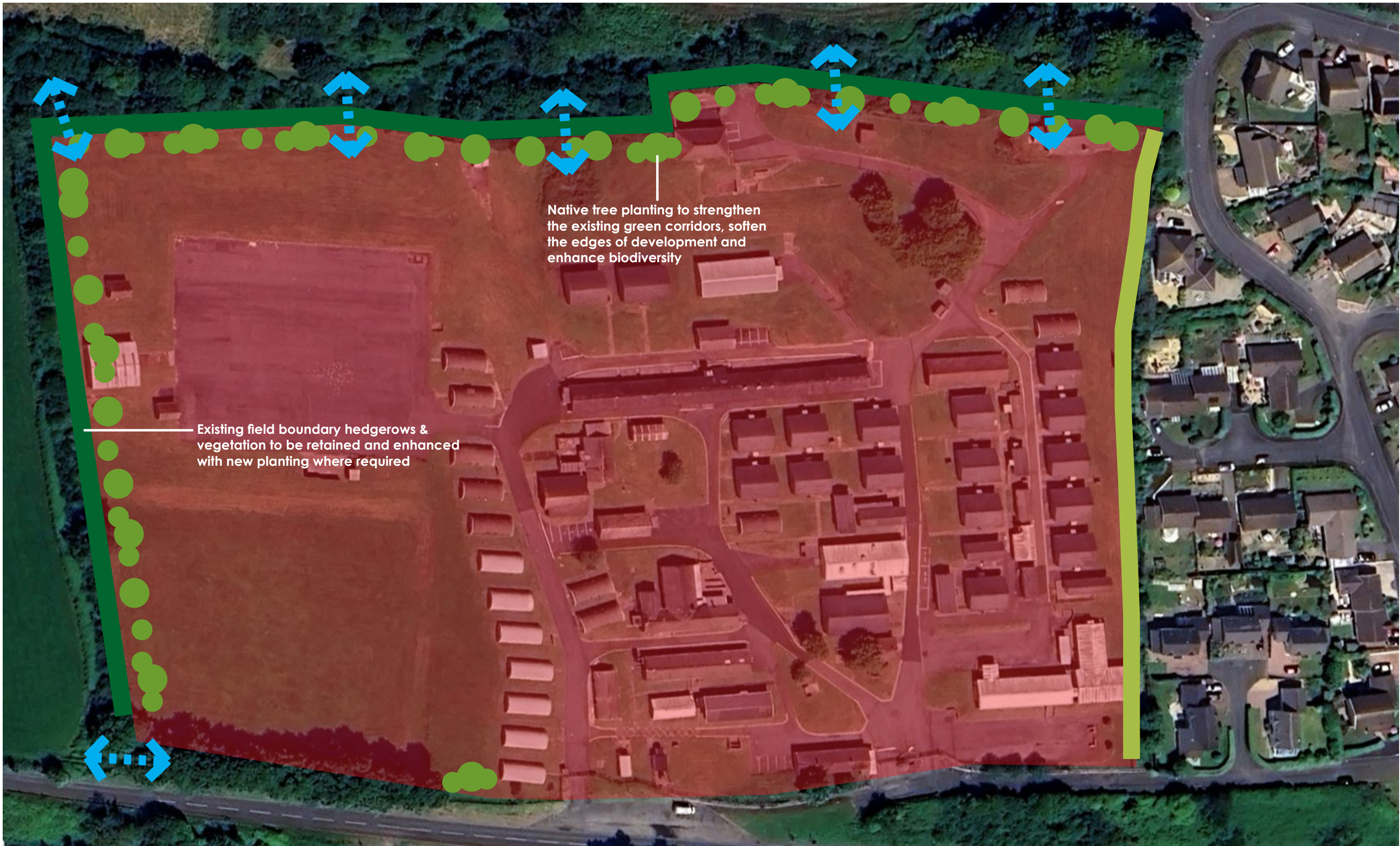
Photo Viewpoints & Approximate View Angles

Note:

Public rights of way, other routes of public access and roads / paths represented by standard Ordnance Survey symbols

Client	Defence Infrastructure Organisation
Project	Penally Training Camp
Drawing Title	Location of Photo Viewpoints
Drawing No.	TDA/2994/03
Scale	Not to Scale
Date	September 2024
Checked	





**Structural Landscape Strategy
(TDA.2994.04) Proposed Residential
Development, Penally Training Camp**



PHOTOGRAPHS

Photo Viewpoint 1	Short-range view looking south west from a public footpath between Hill Farm and Crack Farm
Photo Viewpoint 2	Short-range view looking south east from a public footpath between Hill Farm and Crack Farm
Photo Viewpoint 3	Short-range view looking south from a public footpath to the south of the Ridgeway
Photo Viewpoint 4	Short-range view looking north from the Wales Coast Path
Photo Viewpoint 5	Mid-range view looking north east from the Wales Coast Path
Photo Viewpoint 6	Mid-range view looking north from the Wales Coast Path
Photo Viewpoint 7	Long-range view looking north east from the Wales Coast Path