



*Yn dilyn ymgynghoriad ar y Cynllun Datblygu Lleol Adneuo 2 (CDL2), mae Cyngor Sir Penfro yn cynnig rhywfaint o 'Newidiadau Canolbwytiedig.' Hoffem glywed eich barn ar y rhain.*

*Dylid defnyddio'r ffurflen hon ar gyfer yr holl sylwadau (h.y. sylwadau neu wrthwynebiadau). Mae fersiynau electronig a nodiadau cyfarwyddyd ar gael ar <https://www.sir-benfro.gov.uk/adolygur-cynllun-datblygu-lleol/newidiadau-canolbwytiedig> Os ydych yn cyflwyno copi ar bapur, dylech atodi tudalennau ychwanegol lle bod angen.*

***Sylwer bod rhaid i sylwadau berthyn i'r Newidiadau â Ffocws arfaethedig yn unig, ac nid i agweddau eraill ar y Cynllun Datblygu Lleol ar Adnau.***

*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 15 Medi 2025. Dychwelwch y ffurflenni at: [ldp@pembrokeshire.gov.uk](mailto:ldp@pembrokeshire.gov.uk) neu***

*Y Tîm Cynlluniau Datblygu, Neuadd y Sir, Freeman's Way, Hwlfordd, Sir Benfro, SA61 1TP*

Following consultation on the Deposit Local Development Plan 2 (LDP2), Pembrokeshire County Council is proposing some 'Focussed Changes'. We would like your views on these.

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/focused-changes> If you are submitting a paper copy, attach additional sheets as necessary.

**Please note that representations must relate only to the proposed Focussed Changes, and not to other aspects of the Deposit LDP.**

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 15th September 2025.** Please return forms to: [LDP@pembrokeshire.gov.uk](mailto:LDP@pembrokeshire.gov.uk) or The Development Plans Team, County Hall, Freeman's Way, Haverfordwest, Pembrokeshire SA61 1TP

**RHAN A: Manylion cysylltu**

**PART A: Contact details**

**Eich manylion/manylion eich cleient**

**Your / your client's details**

Enw  
Name

Teitl swydd (lle y bo'n  
berthnasol)  
Job title (where relevant)

Sefydliad (lle y bo'n  
berthnasol)  
Organisation (where relevant)

**Manylion yr asiant (os  
ydynt yn berthnasol)**

**Agent's details (if relevant)**



Cyfeiriad Address	
Rhif ffôn Telephone no	
E-bost Email address	
Llofnodwyd Signed	
Dyddiad Date	

**RHAN B: Eich sylw**

**PART B: Your representation**

Eich enw / sefydliad

Oli Haydon, Stantec – obo ateb Group Ltd

Your name / organisation

**1. Pa newidiadau canolbwyntiedig rydych yn rhoi sylwadau arnynt?**

**1. Which Focussed Changes are you commenting on?**

Cyfeirnod(au) y Newidiadau Canolbwyntiedig

Focussed Change reference number(s)

FC1.Context.01

FC1.Context.03

FC4.SP03.01

FC5.GN15.01

FC5.GN15.03

**2. Cyn i chi esbonio eich sylwadau'n fanwl, byddai'n dda gwybod p'un a gredwch, o ganlyniad i'r Newidiadau Canolbwyntiedig, fod y Cynllun yn gadarn ai peidio, neu a ydych o'r farn bod rhannau ohono neu bob rhan ohono'n ansad a bod angen ei newid.**

*I gael rhagor o wybodaeth am gadernid a gofynion gweithdrefnol, gweler y nodiadau cyfarwyddyd. Os ydych yn ansicr, gadewch yr adran hon yn wag.*



**2. Before you set out your comments in detail, it would be helpful to know whether you think that, as a result of the Focussed Changes, the Plan is sound or that all or parts of it are unsound.**

For more information on soundness and procedural requirements, see the guidance notes. If you are unsure, leave this section blank.

*Rwyf o'r farn bod y CDLI yn gadarn*

I think the LDP is sound

**X**

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

I think the LDP is unsound and should be changed



### 3. Rhestrwch eich sylwadau isod.

*Esboniwch pam rydych yn gwrthwynebu neu'n cefnogi'r Newidiadau Canolbwyntiedig a nodir. Lle bo'n bosibl, nodwch pa newidiadau sydd eu hangen i wneud y Cynllun Datblygu Lleol yn gadarn. Dylech gynnwys yr holl wybodaeth, tystiolaeth a gwybodaeth ategol sy'n angenrheidiol i gefnogi eich sylw. 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.*

### 3. Please set out your comments below.

Explain why you object to or support the identified Focussed Changes. Where possible, identify what changes are needed to make the LDP sound. Include all the information, evidence and supporting information necessary to support your representation. 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.

This response is submitted on behalf of the ateb Group Limited (the 'Promoters') in response to Pembrokeshire County Council's LDP2 Deposit Plan 2 (the 'Plan') **Focused Changes** consultation Monday 4th August and midnight Monday 15th September 2025.

They relate solely to the Promoters land interests for land between Longstone Court and 62 Station Road, Letterston (the 'Site'). The site is draft allocated in the emerging LDP2 for a minimum of 38 dwellings under reference HSG/053/LDP2/1.

Land Between Longstone Court and 62 Station Road, Letterston presents the opportunity for a sensitively designed and appropriately scaled development of around 38 new homes comprising a mix of sizes and tenures, ample public open space, a flexible and permeable layout and retained green infrastructure.

The emerging Plan expects the Site to begin delivery of housing in 2029, with a steady rate of growth to allow for completion by 2033. The provision of full market housing will likely lead to an earlier rate of delivery within the Plan period, to the benefit of the Council's assurances of the fulfilment of their housing requirement. Furthermore, once the LDP2 is adopted, planning will progress for the site, giving the potential to have a submission ready before the end of 2026. Depending upon the timescales to achieve an approval, there is an opportunity to start construction as early as 2027.

We provided a response to the Deposit Plan 2 in December 2024 where it was reiterated that the promoters are committed to continuing their legacy of delivering high-quality, sensitively designed homes for the residents of Letterston. The Promoters remain keen to continue working with the Council and local stakeholders to bring forward development that is tailored to the needs of the community ensuring benefits are delivered for existing and new residents.



We have reviewed the Focused Changes to the Plan and we continue our support of the inclusion of the land at Station Road, Letterston as a draft allocation. We set out our comments below on the identified Focused Changes relevant to this Site.

#### **FC1.Context.01**

This change is supported as it adds an appropriate and up to date definition of affordable housing.

#### **FC1.Context.03**

The replacement of references to Nitrate Vulnerable Zones with the relevant sections of the Water Resources (Control of Agricultural Pollution) (Wales) Regulations is supported.

#### **FC4.SP03.01**

We recognise that the proposed change should increase the range of affordable housing that can be delivered and ensure the majority of provision is for those most in need. It is noted that Phase 2 of the site, consented but yet to be constructed will deliver beyond the total of required affordable homes in the next 13-year period.

Focusing on new *market* housing, the draft allocation for the Site for 38 dwellings can achieve and will exceed the new market housing requirements. Our Site delivers the Plan's suggested tenure mix and the remainder will respond to market conditions and site characteristics, whilst acknowledging the broad proportions calculated within the Plan.

#### **FC5.GN15.01**

We welcome the updated information included within Policy GN15. The Policy requires all new build residential development on sites of 5 or more units to provide a minimum of 20% of properties built to Lifetime Homes Standards and in addition, wheelchair user dwellings will be supported. The emerging layout for the Site ensures these space standards would be met, and whilst we support the provision of 20% Lifetime Homes Standard, we propose that 100% of the Site would be delivered to this standard, in line with ateb Group's commitments.

#### **FC5.GN15.03**

As above, we welcome the flexibility of the proposed changes to this policy.

We note that whilst some changes are proposed to draft Policy GN16 (Residential Allocations) and draft Policy GN20 (Local Needs Affordable Housing), the matter raised at the previous consultation with regards to the land at Station Road, Letterston has not been addressed, although not necessarily a matter related to the soundness of the Plan.

The requirements of GN20 have been derived from the Council's *2024 Financial Viability Report and the Pembrokeshire Study*. This involved high-level viability assessments being undertaken across the range of site typologies, for each of the 4 Housing Market Areas that were identified from an updated study of house prices throughout the County. The results from these high-level viability assessments were used to inform the target percentages of affordable housing that it



should be viable to deliver on sites across the County, encapsulated in Policies GN 16 and GN 20 of the Deposit Plan. The percentages relate to the expected on-site provision of affordable homes that the high-level assessments show to be viable. The table shows that 0% contributions on-site are viable across all development sizes within Band 1 settlements. The supporting text associated with GN20 designates Letterston as Band 1, as such an off-site contribution would be required. It is noted that within the adopted Local Plan, Policy GN27 Residential Allocations required the 90 units at Letterston Court Meadow to deliver 5% affordable units on-site.

We find there is an issue within the degree to which GN20 expands upon the calculation of the community sum considered necessary. It is not clear what Band 1 developments are expected to provide financially in housing contributions on-site or off-site via commuted sum. The Affordable Housing SPG (2015) provides commuted sum calculations for corresponding affordable housing requirements but from the point of 5% upwards, with no sum equivalent provided for those areas where 0% is the target affordable housing.

It is recommended that the structure of the policy be simplified and a commitment be made to a robust monitoring and review process to track the policy's impact and effectiveness as well as reflecting market conditions. Should the mechanism not be altered, a simplified way of calculated the commuted sum would benefit smaller developer enterprises.

Overall we agree with the proposed *Focused Changes* to the Plan, which is found to be broadly sound, and we continue our support of the inclusion of the land at Station Road, Letterston within the Plan.



Tick here if you are submitting additional material to support your representation.	
<p><b>5. Os ydych yn gwrthwynebu Newid Canolbwyntiedig neu ydych chi eisiau siarad mewn sesiwn gwrandawriad yr Archwiliad cyhoeddus?</b></p> <p><i>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, bydd yr Arolygydd yn pennu'r weithdrefn fwyaf priodol er mwyn darparu ar gyfer y rhai sydd eisiau rhoi tystiolaeth lafar.</i></p> <p><b>5. If you are objecting to a Focussed Change, do you want to speak at a hearing session of the public examination?</b></p> <p>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 note that the Inspector will determine the most appropriate procedure for accommodating those who want to provide oral evidence.</p>	
<p><i>Nid wyf am siarad mewn sesiwn gwrandawriad ac rwyf yn fodlon i'm sylwadau ysgrifenedig gael eu hystyried gan yr Arolygydd.</i></p> <p>I do not want to speak at a public hearing and am happy for my written representations to be considered by the Inspector.</p>	<b>X</b>
<p><i>Rwyf am siarad mewn sesiwn gwrandawriad.</i></p> <p>I want to speak at a public hearing.</p>	
<p><i>Os ydych chi eisiau cyfranogi mewn gwrandawriad, nodwch isod ynglŷn â beth rydych chi eisiau siarad (e.e. 'Safle tai ym Mhen y Graig' neu 'Y targed tai cyffredinol').</i></p> <p>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').</p>	
<p><b>6. Os ydych am siarad, byddai'n ddefnyddiol pe gallech nodi ym mha iaith hoffech chi gael eich clywed.</b></p> <p><b>6. If you wish to speak, it would be helpful if you could indicate in which language you would like to be heard.</b></p>	
<p><i>Hoffwn i gael fy nghlywed yn Gymraeg.</i></p> <p>I wish to be heard in Welsh.</p>	
<p><i>Hoffwn i gael fy nghlywed yn Saesneg.</i></p> <p>I wish to be heard in English.</p>	<b>X</b>



## Nodiadau cyfarwyddyd

### Guidance notes

Bydd Cynllun Datblygu Lleol 2 (CDL2) Cyngor Sir Penfro yn cael 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. A yw'r cynllun yn ffitio? (h.y. a yw'n gyson â chynlluniau eraill?)
2. A yw'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'r gofynion gweithdrefnol yn Arweiniad Gweithdrefnol ar Archwiliadau Cynllun Datblygu Lleol yr Arolygiaeth Gynllunio.

Yn dilyn ymgynghoriad ar fersiwn Cynllun Adnueo 2 o Gynllun Datblygu Lleol 2, mae Cyngor Sir Penfro yn gwneud nifer gyfyngedig o 'newidiadau â ffocws' i wneud y Cynllun yn gadarn cyn ei archwilio. Ymgynghorir ar y newidiadau hyn cyn bod yr archwiliad yn dechrau. Caiff unrhyw ymatebon eu hanfon ymlaen yn uniongyrchol at yr Arolygydd Cynllunio.

Os ydych yn gwrthwynebu Newid Canolbwytiedig, dylech ddweud pam mae'n peri i'r Cynllun fod yn ansad a sut dylid newid y Newid Canolbwytiedig er mwyn gwneud y Cynllun yn gadarn.

Lle rydych yn cynnig newid i'r Newid Canolbwytiedig byddai'n ddefnyddiol egluro

The Pembrokeshire County Council Local Development Plan 2 (LDP2) 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.

Having consulted on the Deposit Plan 2 version of LDP2, Pembrokeshire County Council is making a limited number of 'Focussed Changes' to make the Plan sound before it is examined. These changes are being consulted upon before the examination starts. Any responses will be forwarded directly to the Planning Inspector.

If you are objecting to a Focussed Change, you should say why you think it makes the Plan unsound, and how the Focussed Change should be changed to make the Plan sound.

Where you propose a change to a Focussed Change it would be helpful to make clear which test(s) of soundness you believe it fails. Failing to identify a test will not mean that your comments will not be considered, providing it



*pa brawf (profion) cadernid rydych yn credu ei fod yn eu methu. 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 mwy nag un newid i'r Cynllun, nid yw bob amser yn angenrheidiol llenwi ffurflenni ar wahân ar gyfer pob rhan o'ch sylw. Gall fod, fodd bynnag, yn ddefnyddiol defnyddio 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 adnabod cynrychiolydd y grŵp (neu'r prif ymarferydd) yn glir.*

relates to the Focussed Changes. You should include all your comments on the form, using accompanying documents and supporting evidence where necessary.

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.