



12th September 2025

fao. The Development Plans Team

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

Dear Sir / Madam,

Focussed Changes Consultation Response – Ref. S/HSG/086/LDP2/3 – South of Conway Drive, Castle Pill Road, Steynton

We are instructed on behalf of our client [REDACTED] [REDACTED] to make this submission in response to the Pembrokeshire County Council Local Development Plan 2 (2017-2033) Focussed Changes consultation.

Focused change 'FC5.GN20.03' has been undertaken by PCC to change the map to identify Steynton as being in Band 2 Housing Market Area on the Proposals Maps. The amended map of Steynton includes the proposed allocation of 'South of Conway Drive, Castle Pill Road, Steynton' (ref. S/HSG/086/LDP/3) within the boundaries of Band 2. In light of this change, and no other changes to the allocation itself, the site is continuing to be identified as a residential allocation in the emerging Plan.

Accordingly, these representations set out our client's **objection** to the continued allocation of the site (Ref. S/HSG/086/LDP/3) for residential use – which comprises a residential strategic allocation to deliver a minimum of 117no. units in the Plan period, with a further 163no. units to be delivered beyond the Plan period.

Background

Previous representations were made on behalf of our client to object to the proposed allocation of the site at Deposit Plan 2 stage. Concerns were raised over the site's suitability and deliverability in the LDP2, which comprise the following:

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

Given that no changes are proposed to the site itself under the 'Focussed Changes' consultation, these concerns and overall reasons for objections remain. Accordingly, this representation builds on the principal areas of concern set out at Deposit Plan stage, and as such, this letter should be read in conjunction with our previous representation.

Highways

As outlined in full at Deposit Plan 2 stage, it is considered that the proposed allocation of the site is constrained for 2no. primary highways / access issues – which relate to (1) the site entrance to the west of the site via Castle Pill Road, and (2) the principal access proposed from the north through the existing Beaconsing Field development. These issues

are considered to be fundamental, and in turn, undermine the suitability and deliverability of the proposed strategic allocation in the emerging Plan.

Given that no changes have been made to the proposed strategic allocation, the concerns raised previously in regard to the two accesses still stand and are discussed below.

Western Access – Castle Pill Road

In respect of the western entrance access point (via Castle Pill Road), it is not considered sufficient for both highway safety and green infrastructure / biodiversity grounds. Firstly, Castle Pill Road is extremely narrow, and there is an existing 'pinch point' located towards the northern end of the road. Existing on-street parking constrains the road even further, and therefore, it is not considered that the road is suitable to accommodate the likely traffic that will be generated by the development. As set out at Deposit Stage, it has been held historically and consistently that the capacity of the road cannot accommodate any additional flows. This has appeared to be recognised by the site promoter given it is not the principal access into the site.

Whilst Castle Pill Road is not the principal access into the site, given the quantum of development proposed (280no. units in total), significant levels of vehicular traffic will be created on Castle Pill Road, and for the reasons set out above, the road is not up to standard to accommodate such levels. It therefore follows that the development will have an unacceptable impact on Castle Pill Road, and will bring about significant highway safety concerns as a result.

It is also the case that significant hedgerow and tree removal would be needed to achieve the required highway and pedestrian widths to meet adoptable standards. This would bring about significant loss of green infrastructure, which is contrary to the national policy provisions which seek to protect and enhance such assets. As set out in the Deposit Plan representations, the removal of hedgerow and trees will also result in significant landscape and visual impacts, and as a result, the rural character and appearance of Castle Pill Road will be permanently detrimentally affected.

The above identified issues associated with Castle Pill Road will be exacerbated by the delivery of the parcel to the north of the site, which is also allocated for residential development in the LDP2 (site ref. HSG/086/LDP2/2 – East of Castle Pill Road, Steynton). This site is expected to deliver a minimum of 23no. homes in the Plan period. As such, the impacts brought about by the proposed strategic allocation coupled with the development of the site to the north causes significant concern regarding the highway safety of Castle Pill Road, and therefore, it is considered to be fundamentally flawed as an access point into the site.

Accordingly, given that no changes have been proposed to the strategic allocation, the concerns expressed at Deposit Plan stage, and reiterated above, remain.

Northern Access – Beaconing Field

The proposed strategic allocation also seeks to utilise a northern access point that would connect to the existing development at Beaconing Field – which is subject to planning permission approval ref. 18/0503/PA, and has been / is being built out accordingly. Within the Deposit Plan representations, an overlay of the two sites was provided, and for the purposes of this objection, this has been included overleaf:



Overlay of proposed strategic allocation and Beaconing Fields

As illustrated in the overlay image above, and confirmed in the Deposit Plan representations, there is no existing connection point within the Beaconing Fields development that connects to the principal access within the site. As such, any access into the site from the north is severely questionable, and by association, undermines the deliverability of the strategic allocation. This is further exacerbated by the case that in order to facilitate an adoptable highway into the site, this would require at least one or possibly two properties to the north to be removed.

The existing Local Area of Play (LAP) at the southwestern end of the Beaconing Field development also prohibits any connection point in this location.

Accordingly, the current layout of the proposed strategic allocation does not allow for any suitable connections from the existing development to the north, and is fundamentally constrained as a result. This, therefore, raises serious concerns as to the deliverability of the site, and its proposed allocation in the emerging Plan.

The Beaconing Field development has made provision for a future connection point to the south of the development, however, this does not marry up to the location of the principal access for the proposed strategic allocation. As set out in the Deposit Plan representations, the eastern through road is of higher specification than that of the western road

which connects to the boundary of the strategic allocation, and it is the case that there are landownership constraints for the principal road given its location / position where it terminates at the site's boundary.

Accordingly, it is considered that the existing site layout of the strategic allocation does not allow for any suitable connections from the development to the north, and moreover, even if the layout was to change, the site is constrained in utilising the connection points that have been implemented in the northern development. As such, the strategic allocation is fundamentally constrained, by way of having no suitable access from the north.

Infrastructure Capacity

As set out at Deposit Plan 2 stage, concerns are raised in regard to the significant infrastructure capacity issues associated with the proposed level of development at the site, which will bring about deliverability issues, and in turn, undermine the site's suitability as an allocation.

It is widely recognised that there is limited capacity in the local foul system to accommodate further residential development in Steynton. As such, significant network improvements would be needed in order to facilitate a development of this scale, which raises both viability and deliverability concerns.

Moreover, any offsite connections will need to run through third-party land to connect to existing points in the system, and there are no arrangements in place for such connections.

Accordingly, the credibility of the proposed allocation is significantly undermined by its ability to be serviced by existing infrastructure, and in turn, the deliverability of the site is considered to be flawed. It therefore follows that the site is not considered either suitable or available for its proposed development in the emerging Plan, and should not be allocated accordingly.

Summary and Conclusion

In summary, for the reasons set out in this letter, as well as the objection raised at Deposit Plan 2 stage, our client considers that the site is undeliverable as a strategic allocation in the emerging Plan, and therefore, should not be allocated accordingly. Significant concerns relating to highways, green infrastructure, and infrastructure capacity that were raised previously remain valid, and no changes have been made to the site as part of the Focussed Changes. As such, the site should be removed as an allocation in the emerging Plan as it fails the Test of Soundness given it has not been demonstrated that it is suitable, available, and deliverable for residential development.

We trust that these comments will be duly considered alongside our objection / representation made at Deposit Plan 2 Stage as part of this consultation.

Yours sincerely



Geraint John
Director
Geraint John Planning Ltd.



Yn dilyn ymgynghoriad ar y Cynllun Datblygu Lleol Adneuo 2 (CDL2), mae Cyngor Sir Penfro yn cynnig rhywfaint o 'Newidiadau Canolbwyntiedig.' 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-canolbwyntiedig> 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 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 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

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

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

Cyfeiriad
Address



Rhif ffôn Telephone no	
E-bost Email address	
Llofnodwyd Signed	
Dyddiad Date	12/09/2025

RHAN B: Eich sylw

PART B: Your representation

Eich enw / sefydliad

Your name / organisation

Geraint John Planning

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)

FC5.GN20.03

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

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

X



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.

Please see submitted representations.

Ticiwch yma os ydych yn cyflwyno rhagor o ddeunydd i gefnogi eich sylw.

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



5. Os ydych yn gwrthwynebu Newid Canolbwyntiedig neu ydych chi eisiau 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, bydd yr Arolygydd yn pennu'r weithdrefn fwyaf priodol er mwyn darparu ar gyfer y rhai sydd eisiau rhoi tystiolaeth lafar.

5. If you are objecting to a Focussed Change, 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 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.

X

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').

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').

Ref. S/HSG/086/LDP2/3 – South of Conway Drive, Castle Pill Road, Steynton

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

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

Hoffwn i gael fy nghlywed yn Gymraeg.

I wish to be heard in Welsh.

Hoffwn i gael fy nghlywed yn Saesneg.

I wish to be heard in English.

X



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.