



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 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/focussed-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	15/09/2025

RHAN B: Eich sylw

PART B: Your representation

Eich enw / sefydliad

CarneySweeney obo Lidl GB 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

FC4.SP15.01

Focussed Change reference number(s)

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.

We consider that Focussed Change FC4.SP15.01 and the introduction of text within Policy SP15 to reflect the intentions in Paragraph 4.95 to allow for changes of use of land and buildings within the site boundaries of Strategic Employment Sites to non-employment uses, does not accord with Planning Policy Wales (Edition 12, Feb 2024) (PPW).

PPW does not require the demonstration of 'exceptional circumstances' in regards to allowing employment generating development that does not fall within traditional (Class B) employment use classes. The focussed change wording is not sufficiently flexible and fails to recognise the role of complimentary employment generating uses within the employment allocations.

PPW states:

"5.4.1 For planning purposes the Welsh Government defines economic development as the development of land and buildings for activities that generate sustainable long-term prosperity, jobs and incomes. The planning system should ensure that the growth of output and employment in Wales as a whole is not constrained by a shortage of land for economic uses.

*5.4.2 Economic land uses include the traditional employment land uses (offices, research and development, industry and warehousing), **as well as uses such as retail, tourism, and public services...**The Welsh Government seeks to maximise opportunities to strengthen the foundational economy, particularly the **food, retail, tourism and care sectors** which play such a prominent role throughout Wales; the planning system should be supportive of this aim..." (CS emphasis)*

As noted in our previous representations made to the Deposit Draft 2 Consultation, at the Preferred Approach Stage, equivalent Policy SP13 stated "Use Classes B1, B2 and B8 will be allowed on these sites, together with any other compatible uses", and Policy SP14 of the Deposit version includes the following wording "The use classes specified for each site will be allowed, together with other uses closely related to the main employment use."



Proposed Change to the LDP

We consider that Policy SP15 wording, and specifically the allocation of site ref: S/EMP/096/00005, should not seek the demonstration of 'exceptional circumstances' as this is discordant with PPW. The wording should instead recognise the definition of economic land uses in PPW and duly allow for the delivery of a wider range of economic uses, reflective of PPW guidance, and subject to site specific consideration and constraints. This should include employment generating retail use (Use Class A1) where appropriate and subject to other relevant national guidance i.e. PPW retail tests regarding need, sequential and impact considerations and any requisite site mitigation.

Policy SP15 should refer to 'appropriate circumstances' being demonstrated in line with other relevant prevailing national guidance and tests. This is to ensure that sites hold the greatest potential to deliver on the stated objectives of the policy in delivering Objectives B, C, E and I and to reflect the approach in PPW. Further details and justification are set out in our Deposit Draft 2 representation, which we do not look to repeat here.

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 Canolbwytiedig 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').

Policy allocation ref: S/EMP/096/00005 – land at London Rd/off Isaac Way

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 Adnau 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.