



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	Peter Parnell	Linda Jones
Teitl swydd (lle y bo'n berthnasol) Job title (where relevant)		
Sefydliad (lle y bo'n berthnasol) Organisation (where relevant)	Millstone Holidays Pembroke	Babb Architecture
Cyfeiriad Address	REDACTED	REDACTED
Rhif ffôn Telephone no	REDACTED	REDACTED
E-bost Email address	REDACTED	REDACTED
Llofnodwyd (gallwch teipio) Signed (can be typed)	PW Parnell	



Dyddiad Date	16/12/24
RHAN B: Eich sylw PART B: Your representation	
Eich enw / sefydliad Your name / organisation	Peter Parnell Millstone Holidays
1. Ar ba ran/rannau o'r Cynllun (neu ddogfennau ategol) rydych yn rhoi sylwadau? 1. Which part(s) of the Plan (or supporting documents) are you commenting on?	
Rhif(au) polisi Cynllun Datblygu Lleol neu ddyraniad safle LDP policy or site allocation number(s)	Candidate Site 087
Rhif(au) paragraff y Cynllun Datblygu Lleol neu adran LDP paragraph or section number(s)	
Cyfeiriad(au) Map Cynigion y Cynllun Datblygu Lleol LDP Proposals Map reference(s)	Pembroke
Os yw eich sylw yn perthyn i ddogfen ategol (e.e. y Gwerthusiad o Gynaliadwyedd), rhowch yr enw(au) a'r cyfeiriad(au) i mewn yma. If your representation relates to a supporting document (e.g. the Sustainability Appraisal), insert the name(s) and reference(s) here.	
2. Cyn i chi esbonio eich sylwadau'n fanwl, byddai'n dda gwybod p'un a gredwch fod y Cynllun yn gadarn ai peidio, ac a yw'n bodloni'r gofynion gweithdrefnol. <i>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>	
Rwyf o'r farn bod y CDLI yn gadarn ac yn bodloni gofynion gweithdrefnol. I think the LDP is sound and meets procedural requirements.	
Rwyf o'r farn nad yw'r CDLI yn gadarn ac y dylid ei newid. I think the LDP is unsound and should be changed.	X
Rwy'n credu na chafodd y gofynion gweithdrefnol eu bodloni. I think that the procedural requirements have not been met.	
3. A hoffech i'r Cynllun gynnwys polisi, dyraniad safle neu paragraff newydd?	



Ticiwch bob un sy'n berthnasol.

3. Would you like the LDP to include a new policy, site allocation or paragraph?

Tick all that apply.

Dyraniad safle newydd
New site allocation

X

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

Slothy Mill, Pembroke, SA714DJ

Cyfeiriad y cais
Site reference

Candidate Site 087

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.

See attached info marked Candidate site 087, 5 additional pages'

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.

x

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.

x

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.

Candidate site 087

Slothy Mill, Pembroke, SA71 4DJ

Site area 0.42 hectare

**CANDIDATE SITE ASSESSMENT OUTCOME**

Outcome category Red 4

Highways. Also designated Open Space

HIGHWAYS

The proposed candidate site 087 would be accessed from Well Hill. Highways improvements have been spoken about for this road for many years but have not materialised. The lands for it is proposed to be safeguarded under LDP2, (Candidate site 356).

In 2011, when a planning application was made for 4no. holiday lodges, (11/0802/PA) the highways consultation stated that

Visibility at the existing access point, at its junction with Well Hill, when measured at an "x" distance of 2.4 metres back from the edge of the carriageway, is already deemed to be satisfactory in either direction. Part of the entrance bellmouth, together with approximately 40 metres of the access lane, has already been surfaced with bituminous macadam. The unsurfaced parts (i.e. loose stone/gravel) of the entrance bellmouth has already started to get

dragged onto the county road, which from a highway safety perspective, is deemed to be unacceptable.

As shown on drawing pp/0610/01, dated June 2011, both the Milk stand and the Field gate have already been removed.

RECOMMENDED CONDITIONS

- 1. The access lane shall continue to be left open, unimpeded by gates or any other barrier.*
- 2. Before any construction work is commenced, adequate and suitable areas shall be provided within the site for the parking, turning, loading and unloading of all vehicles attracted to the site and for the storage of building materials clear of the public highway.*
- 3. The parking and turning areas, as shown on the submitted drawings, shall be completed before the development is brought into use and thereafter shall be retained for no purpose other than parking and turning.*
- 4. All surface water shall be trapped and disposed of so as not to flow onto any part of the public highway.*
- 5. The unsurfaced parts of the existing entrance bellmouth shall be surfaced with porous asphalt or any other bound surfacing before the development is brought into use.*

The application was refused on appeal for other reasons. The development of 4 no. holiday lodges was acceptable by highways. In the summer when these would have been most probably occupied is exactly when the area was at its busiest with holiday traffic and therefore Will Hill also at its busiest.

It is therefore difficult to understand why Highways now object to development at Candidate Site 087.

The following two photographs show a view taken of the entrance to Slothy Mill, (the turning on the left by the blue property) taken in 2011 and 2023. It is clear that there are no alterations to the road which make it more difficult to enter or exit Slothy Mill.



In 2020 an application was made for the erection of single storey cabin. The applications was refused but highways did not object.

Well Hill now has a 20mph speed limit. It was reduced from 30mph in September 2023. Previously it was 30mph

This reduces the stopping sight distance (SDD) from 20metres to 12 metres. This is taken from Table B of TAN 18 which is relevant to built-up areas.

Table B

85th percentile wet weather speed	(kph)	60	50	48	45	40	32	30	25	24	20	16
	(mph)	37	31	30	28	25	20	19	16	15	12	10
SSD (metres)		56	43	40	36	31	22	20	16	15	12	9

Source: *Manual for Streets*

It is understood that local authorities can re-designated the roads but as Well Hill is a short distance from a primary school, we consider this unlikely. Whilst there has been public protest at many roads being given a 20mph status, there is a more general consensus that 20mph should be maintained on roads leading past schools.

Ken Skates was named as new transport secretary in March 2024. He said in April 2024 that 20mph zones should be targeted at schools, hospitals and nurseries.

In 2011, highways did not object to development of 4 units on the site. In 2023 the speed of the road was reduced from 30mph to 20mph improving the safety of the road.

In summary

- In 2011, highways did not object to development at Slothy Mill
- Between 2011 and 2024 there have been no changes to make the entrance more difficult to enter or exit from.
- The reduction of speeds from 30mph to 20mph have made roads safer. TAN 18 requires less visibility.

It is therefore difficult to understand why Highways not object to development at the site.

OPEN SPACE

Object to Open Space designation

In 2010, the Open Space assessment suggested that Pembroke needed 30.71ha and the actual was below the benchmark, however it refers to there *being 'a significant amount of accessible recreational space at Pembroke School which is shared between Pembroke Dock and Pembroke'*.

In 2013 the owner met with PCC planning to discuss implications of Better Woodland Scheme would be at Slothy Mill. At no time was it stated that this would mean that the site might then be at risk of being designated Open Space.

The current LDP adopted in 2013, then designated the land as Open Space.

The Open space Assessment background paper of 2019 refers to different categories of open space, grouped as either formal open space which includes playing fields and informal space. Within the category, the site would be informal outdoor space. It does not list each space included – there is no map which can be referred to

For Pembroke the formal outdoor space target is 17.12. The actual is 8.625. The informal outdoor space target is 27.08, the actual is 20.187. There is a shortfall, however the current LDP does not include the secondary school fields of Henry Tudor School, (formerly Pembroke School) which can be used by the community as open space, either recreational open space or amenity open space.

The Governing Body of Ysgol Harri Tudur / Henry Tudor School regards the school buildings and grounds as a community asset and will make every reasonable effort to enable them to be used as much as possible (PCC School Letting Policy 2018)

Since 2018, a new Welsh Language School has opened in Pembroke, Ysgol Bro Penfro and this will have resulted in a potential increase in Open Space within Pembroke. TAN 16 says that,

Schools are encouraged to open their playing fields and premises for community use, particularly where there is limited provision of playing fields and open space

As both Harry Tudor School and Ysgol Bri Penfro are LA owned schools this should be straightforward to achieve.

When cemeteries and churchyards are valued as open spaces surely school grounds with playing fields should be designated too? This would allow some leeway in allowing some areas proposed to be designated as open space which do not have any right of public access to be developed for much needed housing.

Only a portion of the proposed Open Space is proposed to be developed as Candidate Site 087, only 0.42 ha. There is no right of public access to the land. It would provide a well-situated site, close to the town centre – ideal for a small housing development.

B

