

**Thomas, Kane**

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**From:** Catherine Blyth [REDACTED] >  
**Sent:** 16 December 2024 13:14  
**To:** LDP - For Enquiries  
**Cc:** Oliver Hanney  
**Subject:** Deposit Plan Representation - HSG/132/LDP2/1 (Templeton)  
**Attachments:** Deposit Plan 2 Comments Form 2024 - SP6.pdf; Deposit Plan 2 Comments Form 2024 - GN14.pdf; Consultation Response - Deposit Plan - Templeton 16.12.24.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Categories:** D Rep

**EXTERNAL EMAIL – Exercise care with links and attachments E-BOST ALLANOL – Byddwch yn ofalus wrth agor dolenni ac atodiadau.**

Good Afternoon

Further to the publication of the Pembrokeshire Second Deposit Plan, please find a consultation response enclosed on behalf of the Site Promoter (Idris Davies Ltd) specifically in regard to the Deposit Plan allocation HSG/132/LDP2/1 (West of Kings Park Farm/south of the A4115, Templeton).

The following documents are attached:

- Deposit Plan Report (Asbri Planning, December 2024)
- Deposit Plan Form – GN14
- Deposit Plan Form – SP6

Please let me know if you require any further information, or would like to discuss any aspect of the submission in further detail. I would be grateful if you could acknowledge receipt of the representation.

**Please note, the above is submitted further to incorrect version of documents submitted on 10<sup>th</sup> December (and withdrawn on 11<sup>th</sup> December).**

Kind regards

Catherine

Catherine Blyth - Associate

[REDACTED]  
Cardiff | Swansea



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<http://www.canit.akauk.net/>



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](mailto: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](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**

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

Enw Name	Charlotte Pack	Catherine Blyth
Teitl swydd (lle y bo'n berthnasol) Job title (where relevant)		Associate
Sefydliad (lle y bo'n berthnasol) Organisation (where relevant)	Idris Davies Ltd	Asbri Planning Limited
Cyfeiriad Address		
Rhif ffôn Telephone no		
E-bost Email address		



Llofnodwyd (gallwch teipio) Signed (can be typed)	C. E. BLYTH	
Dyddiad Date	27/11/2024	
<b>RHAN B: Eich sylw</b> <b>PART B: Your representation</b>		
Eich enw / sefydliad Your name / organisation	Catherine Blyth – Asbri Planning Limited	
<b>1. Ar ba ran/rannau o'r Cynllun (neu ddogfennau ategol) rydych yn rhoi sylwadau?</b> <b>1. Which part(s) of the Plan (or supporting documents) are you commenting on?</b>		
Rhif(au) polisi Cynllun Datblygu Lleol neu ddyraniad safle LDP policy or site allocation number(s)	<b>Policy GN14 Residential Allocations</b> (Site Allocation HSG/132/LDP2/1)	
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)		
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.		
<b>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.</b> <i>I gael rhagor o wybodaeth am gadernid a gofynion gweithdrefnol, gweler y nodiadau cyfarwyddyd.</i> <b>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.</b> <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.	No	
Rwyf o'r farn nad yw'r CDLI yn gadarn ac y dylid ei newid.	Yes (please refer to Supporting	



I think the LDP is unsound and should be changed.		Statement for full details)
<i>Rwy'n credu na chafodd y gofynion gweithdrefnol eu bodloni.</i> I think that the procedural requirements have not been met.		No
<b>3. A hoffech i'r Cynllun gynnwys polisi, dyraniad safle neu paragraff <u>newydd</u>?</b> <i>Ticiwch <u>bob un</u> sy'n berthnasol.</i> <b>3. Would you like the LDP to include a <u>new</u> policy, site allocation or paragraph?</b> Tick <u>all</u> that apply.		
Dyraniad safle newydd New site allocation		Yes – expanded site (please refer to Supporting Staement for full details)
Polisi newydd New policy		No
Paragraff neu destun ategol newydd New paragraph or supporting text		No
<b>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).</b> <b>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).</b>		
Enw'r safle Site name	Land West of Kings Park Farm, Templeton	
Cyfeiriad y cais Site reference	278 (Site Allocation HSG/132/LDP2/1)	
<p><i>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.</i></p> <p>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</p>		



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.

Please refer to enclosed supporting statement.

*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.

Yes

### **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*



<p><i>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>	
<p><i>Rwyf am siarad mewn sesiwn gwrandawriad.</i></p> <p>I want to speak at a public hearing.</p>	x
<p><i>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').</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>Policy GN14 Residential Allocations</p> <p>Site Allocation HSG/132/LDP2/1</p>	
<p><b>9. Os ydych am siarad, byddai'n ddefnyddiol pe gallech nodi ym mha iaith yr hoffech gael eich clywed.</b></p> <p><b>9. 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>Rwy'n dymuno cael fy nghlywed yn Gymraeg.</i></p> <p>I wish to be heard in Welsh.</p>	
<p><i>Rwy'n dymuno cael fy nghlywed yn Saesneg.</i></p> <p>I wish to be heard in English.</p>	x





## 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.





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.

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## **RHAN A: Manylion cysylltu**

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**Your / your client's details**

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

Enw Name	Charlotte Pack	Catherine Blyth
Teitl swydd (lle y bo'n berthnasol) Job title (where relevant)		Associate
Sefydliad (lle y bo'n berthnasol) Organisation (where relevant)	Idris Davies Ltd	Asbri Planning Limited
Cyfeiriad Address		
Rhif ffôn Telephone no		
E-bost Email address		



Llofnodwyd (gallwch teipio) Signed (can be typed)	C. E. BLYTH	
Dyddiad Date	27/11/2024	
<b>RHAN B: Eich sylw</b> <b>PART B: Your representation</b>		
Eich enw / sefydliad Your name / organisation	Catherine Blyth – Asbri Planning Limited	
<b>1. Ar ba ran/rannau o'r Cynllun (neu ddogfennau ategol) rydych yn rhoi sylwadau?</b> <b>1. Which part(s) of the Plan (or supporting documents) are you commenting on?</b>		
Rhif(au) polisi Cynllun Datblygu Lleol neu ddyraniad safle LDP policy or site allocation number(s)	Policy SP6 Settlement Boundaries and, as a consequence, the Proposals Map Inset for Templeton	
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)	Proposals Map Inset for Templeton	
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.		
<b>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.</b> <i>I gael rhagor o wybodaeth am gadernid a gofynion gweithdrefnol, gweler y nodiadau cyfarwyddyd.</i> <b>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.</b> <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.	No	
Rwyf o'r farn nad yw'r CDLI yn gadarn ac y dylid ei newid.	Yes	



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.		No
<b>3. A hoffech i'r Cynllun gynnwys polisi, dyraniad safle neu paragraff <u>newydd</u>?</b> <i>Ticiwch <u>bob un</u> sy'n berthnasol.</i> <b>3. Would you like the LDP to include a <u>new</u> policy, site allocation or paragraph?</b> Tick <u>all</u> that apply.		
Dyraniad safle newydd New site allocation		Yes – expanded site (please refer to Supporting Staement for full details)
Polisi newydd New policy		No
Paragraff neu destun ategol newydd New paragraph or supporting text		No
<b>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).</b> <b>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).</b>		
Enw'r safle Site name	Land West of Kings Park Farm, Templeton	
Cyfeiriad y cais Site reference	278 (Site Allocation HSG/132/LDP2/1)	
<p><i>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.</i></p> <p>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</p>		



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.

Please refer to enclosed supporting statement.

*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.

Yes

### **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.	
<i>Rwyf am siarad mewn sesiwn gwrandawriad.</i> I want to speak at a public hearing.	x
<i>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').</i> 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 GN14 Residential Allocations Site Allocation HSG/132/LDP2/1	
<b>9. Os ydych am siarad, byddai'n ddefnyddiol pe gallech nodi ym mha iaith yr hoffech gael eich clywed.</b> <b>9. If you wish to speak, it would be helpful if you could indicate in which language you would like to be heard.</b>	
<i>Rwy'n dymuno cael fy nghlywed yn Gymraeg.</i> I wish to be heard in Welsh.	
<i>Rwy'n dymuno cael fy nghlywed yn Saesneg.</i> 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 (LDP 2)  
Second Deposit Consultation Response

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**Land South of A4115, Templeton**

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December 2024



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## **Chapter 2**

Site Suitability and Housing Need

## **Chapter 3**

Policy Objections and Revised SA Assessment

## **Chapter 4**

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## **Chapter 5**

Conclusion

## **Appendix 1**

Site Location

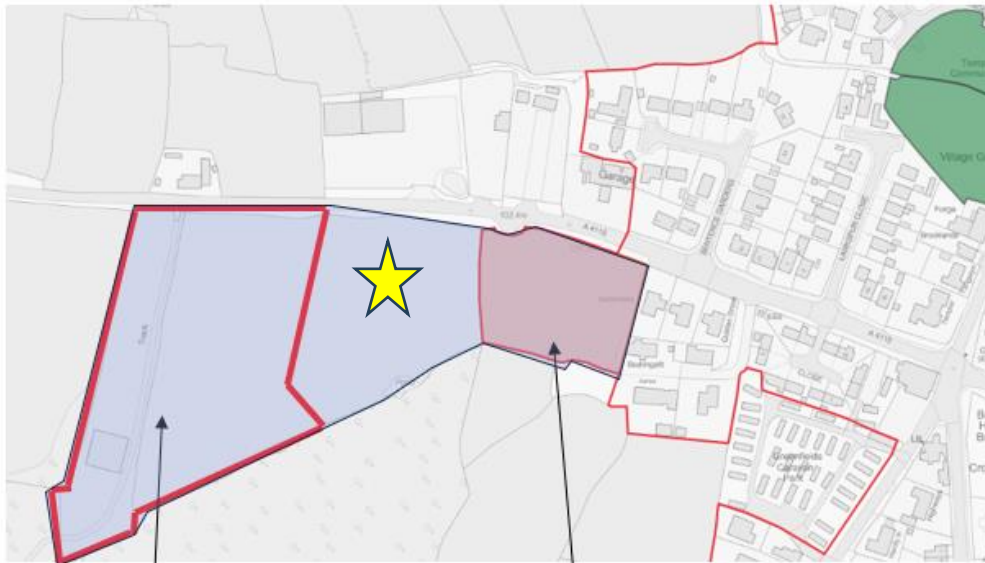
## **Appendix 2**

Indicative Site Layout

# 1 Introduction

- 1.1 This site representation report has been prepared in response to the current public consultation on the Pembrokeshire LDP 2 Second Deposit Plan, and accompanies the requisite response form completed in respect of land west of Kings Park Farm and south of the A4115, Templeton, Pembrokeshire. The representation is submitted on behalf of Idris Davies Ltd.
- 1.2 The site forms part of an employment allocation in the current adopted plan (Ref: FMP/132/00001). Planning permission has also been granted for B1 and B8 uses.
- 1.3 A candidate site request for the use of the site for residential was submitted to the LPA in August 2018 (Ref: 278) which promoted a site layout for 40 dwellings. Accompanying evidence supported the view that there has been little demand for employment uses and where such development has been proposed it has proven not to be viable.
- 1.4 Further to the August 2018 representations, within the first Deposit Plan (published January 2020) the subject site was identified to be allocated for 12 dwellings on 0.61 hectares of land as part of the candidate site (HSG/132/LDP2/1). This decision was positively received, given that it establishes the acceptability and principle of housing development at the candidate site. Furthermore, we are encouraged that it is recognised that the employment allocation is no longer appropriate (as fully evidenced within the August 2018 submission). However, it is disappointing that the First Deposit Plan has not allocated a larger area of the candidate site for residential uses.
- 1.5 Within the Second Deposit Plan (draft published September 2024), the subject site is identified to be allocated for 14 residential units across a site area of 0.61 ha. Whilst it is welcomed that the eastern parcel is once again allocated for residential purposes, it is disappointing that the Second Deposit has not allocated the wider site, to include the western parcel within the housing allocation. The Second Deposit again identifies the western parcel of the site as being situated outside the defined settlement boundary, therefore representing open countryside.
- 1.6 The Site Promoter supports the residential allocation on the Eastern part of the site (as per the allocation for 14 units in the Deposit Plan) but requests that the infill parcel of land (as shown by the star on the plan overleaf is included in the designated housing allocation (HSG/132/LDP2/1) and identified on the Proposals Map accordingly. This land has been evidenced as deliverable during the plan period.
- 1.7 In terms of the content of this submission, Section 2 of the report discusses site suitability and housing need considerations whilst Section 3 provides objections to relevant policies. A revised SA assessment is also included, and Section 4 examines soundness issues. Finally, Section 5 provides a summary and conclusions.





Consented Employment Development

Housing Allocation

 **Parcel of land to be included in housing allocation**

## 2 Site Suitability and Housing Need Considerations

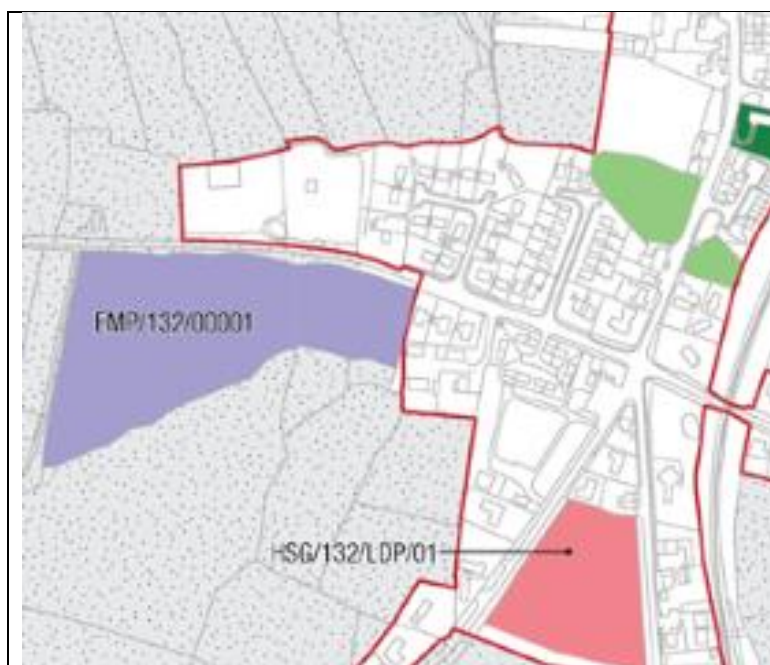
2.1 This section highlights the suitability of the site in terms of its physical characteristics; seeks to justify additional numbers on the basis of housing need. Viability and Deliverability considerations are also discussed. These are discussed under the headings below. It is confirmed that the suitability of the site for housing development remains as per the position discussed in 2018.

2.2 It is important to highlight that the principle of development on the additional land parcel that is requested for inclusion in the extended housing allocation in the RLDP is already established, through the extant planning consent. Through the extension of the housing allocation, overall scheme viability would improve, allowing for the delivery of a higher number of affordable units (which would assist the Local Authority in meeting the urgent and significant need for affordable homes). It is evidenced that the additional land parcel has no constraints to development – the land is fully deliverable, benefitting from the existing site access, with no additional access points onto the highway required.

### Site Characteristics

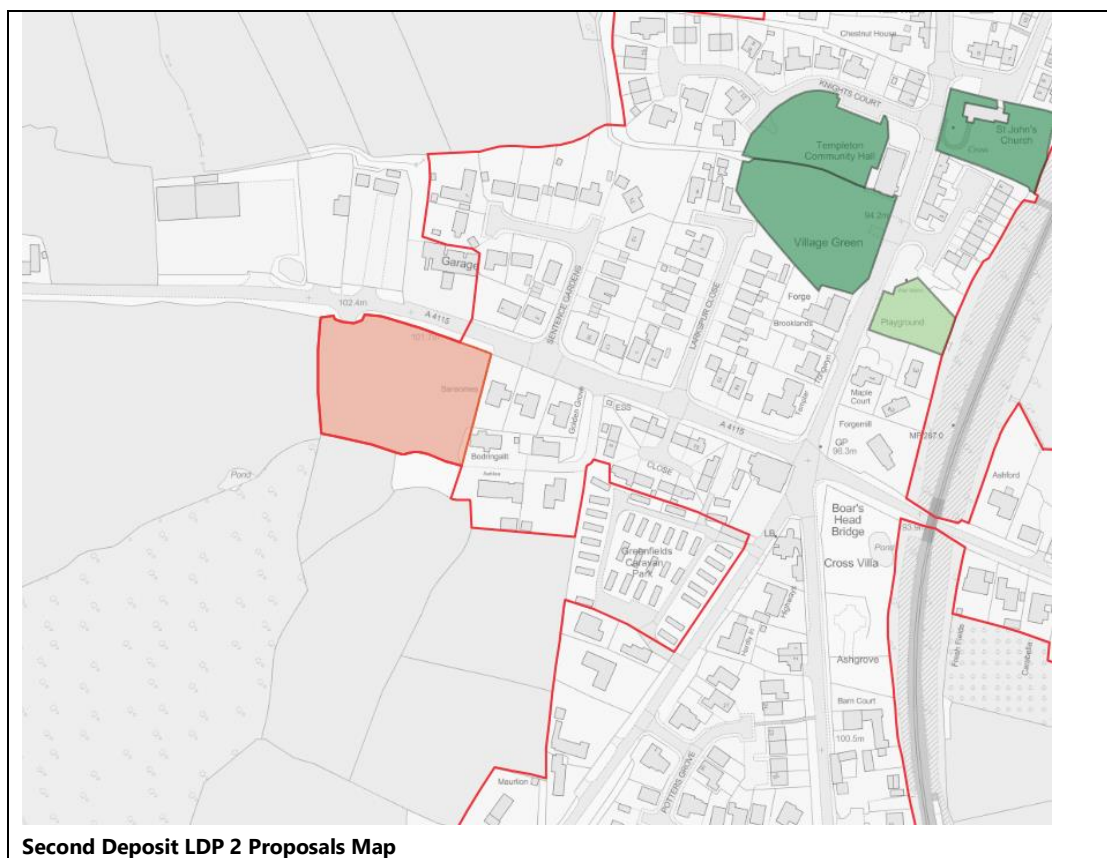
2.3 Adjacent development to the east is residential in nature (Golden Grove), including detached bungalows along the road frontage. The site's western boundary does not follow a physical feature but is contiguous with a point where development ends on the opposite side of the A4115. To the west and south is open agricultural land interspersed with other uses which include a caravan park and disused airfield. As such the site is well contained by existing features and close to facilities in Templeton, which include a Community Primary School, and a regular bus service (381) to the towns of Narberth and Tenby.

2.4 The site lies within an existing Employment Land allocation in the current LDP (Ref: FMP/132/00001). The allocation extends to the edge of the field parcel where the principle of development has been accepted at this location. An extract of the LDP Proposals Map is shown below. The site proposed for residential uses would not extend further to the west than the settlement boundary north of the A 4115.



Adopted LDP Proposals Map

- 2.5 The equivalent extract from the LDP2 Proposals Map inset is shown below, with the proposed housing land allocation occupying the eastern portion of the employment allocation. The housing site is included in the settlement boundary, but it is proposed to exclude existing mixed uses to the north from the settlement boundary.



### Planning History

- 2.6 The table below summarises the planning history of the site in terms of previous planning applications approved for employment uses. Visibility splays were agreed as per planning application 07/1377/PA. The local planning authority have previously confirmed that development was effectively commenced with the provision of the access point.

Application Ref	Proposal	Outcome	Date
03/0662/PA	Outline Application for B1 and B8 Uses	Approved with Conditions	14.07.2004
07/0997/PA	Section 73 Application to extend the period for submission of Reserved Matters	Approved with Conditions	10.12.2007
07/1377/PA	Reserved Matters application for access to industrial site	Approved with Conditions	22.04.2008
11/0834/PA	Erection of 488m <sup>2</sup> Royal Mail Sorting and Delivery Office	Approved with Conditions	14.02.2012

## **Housing Need**

- 2.7 The Second Deposit Plan draws on updated housing market assessment data (i.e. the Local Housing Market Assessment 2021). Within the 2021 Assessment, it is identified that Templeton will have a housing need of 43 dwellings over the next 13 years. This is based on an existing need (base year 2020) of 435 units across all tenures, with an anticipated need for 478 units across all tenures by 2033.
- 2.8 Within the First Deposit Plan, two sites were proposed to be allocated in Templeton, which amounted to a total of 40 dwellings (including the 12 proposed units on the part of the submission site). However, the second allocation (HSG/132/LDP/01) has been removed from the Second Deposit (as a scheme has been built out on the land in the intervening period). As such, only 14 units are now proposed for allocation in Templeton. Based on the housing need of 43 dwellings identified for the settlement of Templeton within the most recent Local Housing Market Assessment, the settlement is subject to a shortfall of 29 dwellings.
- 2.9 There is consequently an argument on the above grounds for extending the allocation on the candidate site to address the identified shortfall of 29 dwellings. It is clearly demonstrated that the candidate site can accommodate an increased number of units, and the forms a logical location for an extended allocation (to serve the identified need in Templeton up to 2033).

## **Viability**

- 2.10 As part of the work undertaken to inform the Deposit Plan, the Local Authority commissioned Burrows Hutchinson Ltd to undertake high-level viability appraisals. The Council has informed the identification of Affordable Housing targets within the Plan – a specific target for the site allocation is stated as 25% - 3 dwellings which is included in the Deposit Plan.
- 2.11 The assumptions used to generate this target are set out within the Preliminary Viability Testing Background Paper 2019 and include:
- That the site is “greenfield” (rather than “brownfield”) in nature
  - That housing will be built to reflect the need in the emerging Local Housing Market Assessment in terms of dwelling types/size
  - On sites of 10 or more homes, 10% will be built to Lifetime Homes Standards (reflecting Policy requirement in GN.13)
  - Homes will be built to nationally described space standards (reflecting Policy requirement in GN.13)
  - 80% of any affordable dwellings provided on-site (on mixed market and affordable housing sites) will be for social rent, and 20% intermediate tenure. Transfer values are calculated at 42% of the full ACG cost/value for the social rented units, and 70% of ACG for all intermediate forms of tenure.
  - That the site is in ACG Band 2
  - That the value of open market properties is between £2,050 psm (£190 psf) and £2,420 psm (£225 psf) according to the size and location of the site, and the number of dwellings suggested in the Deposit LDP-2 under Policy GN14.
  - That S.106 contributions for elements other than affordable housing will be between £2,500 per dwelling and £6,500 per dwelling depending on site size.
- 2.12 In respect of the site area proposed to be allocated we are satisfied with these assumptions. However, in this context a larger allocation would improve the viability and deliver more affordable units. A viability assessment for a 40 unit scheme, which compared this with a mixed use development was included with the original candidate site submission, and remains applicable to the Second Deposit Plan representation.

### **Deliverability Considerations**

- 2.13 An indicative site layout is shown in Appendix 2. This illustrates how a suitable form of residential development could be achieved. The layout shows a scheme of up to 40 plots. A mixture of tenures and detached, semi-detached and link properties would enable a wide mix and choice. Correspondence from Ateb accompanied the earlier candidate site submission. This confirmed an interest in acquiring affordable units, were the site to be released for housing.
- 2.14 Capacity of infrastructure has been confirmed by utility providers for water supply (letter referenced below) and electricity. With regard to the latter, GTC have provided a quotation (dated 11<sup>th</sup> April 2018). The quotation assumes a Low Voltage connection due to the size of the site, and includes excavation and reinstatement costs in the public highway which would be carried out by GTC from the point of connection.
- 2.15 Visibility splays were agreed as per planning application 07/1377/PA. The local planning authority have previously confirmed that development was effectively commenced with the provision of the access point. Achieving sufficient widths and visibility at the site's proposed access point for a residential layout is therefore achievable within the boundary of the site.
- 2.16 It is anticipated that all of the proposed dwellings would respond well to the established character of the surrounding area. It is anticipated that a range of dwelling types and sizes would be incorporated ranging from 2 beds up to 4 beds which would form the basis for interesting street scenes and would help establish a balanced community.
- 2.17 Overall it is considered that the proposal would not have any significant adverse impact upon the residential amenities of existing or future occupiers. The site is proposed for residential uses. However, an increase in population generated will help sustain local facilities and potentially increase demand for additional services to benefit the local community.



### 3 Planning Policy Review

- 3.1 The allocation of 0.61 hectares of land for 14 dwellings on part of the candidate site (HSG/132/LDP2/1) is supported in terms of the Council's acceptance of the principle of housing and its acknowledgement that the employment allocation is no longer appropriate.
- 3.2 However, objections are made to Policy GN14 Residential Allocations on the grounds that a larger site, (which corresponds with the earlier candidate site submission) should be included within the Second Deposit Plan (to serve the identified need in Templeton up to 2033). Policy SP6 – Settlement Boundaries is also objected to on this basis.
- 3.3 A development of 40 dwellings, rather than the 14 envisaged for allocation, would be justified by affordable housing need, as evidenced by the Local Housing Market Assessment. Whilst it acknowledged that there are a number of reasons that a lower housing requirement has been proposed as part of the Second Deposit LDP, the Housing Requirement Background Paper 2023 indicates that lowering the housing requirement needs to be balanced against the need to address the large backlog of affordable housing need identified in the Local Housing Market Assessment and the need to achieve a more balanced population profile.
- 3.4 Furthermore previous planning applications, albeit for B1 and B8 uses, have established the principle of development for the wider area. Indeed, the local planning authority have confirmed that development was effectively commenced with the provision of the access point. Consequently, the inclusion of the remaining area in an area of open countryside and outside settlement limits is inappropriate. A revised assessment in relation to the Council's Sustainability Appraisal (SA) of the site is provided below.
- 3.5 Objections are therefore made to:
1. **Policy GN14 Residential Allocations,**
  2. **Policy SP6 Settlement Boundaries and, as a consequence, the Proposals Map Inset for Templeton**

#### **Assessment in Relation to SA Objectives**

- 3.6 The Table below includes the Council's assessment of the proposed allocation and additional text provided in bold, which would be appropriate to an extended allocation as proposed.

SA Objective	Council Assessment with Additional Text Highlighted to refer to Extended Site Area
1. Develop and maintain a balanced population structure	Provision of housing sites can have positive effects on the population structure, where younger people may stay in the county if there is suitable housing. <b>A larger allocation would provide a wider range of dwelling types and sizes ranging from 2 beds up to 4 beds. This would form the basis for interesting street scenes and would help establish a balanced community.</b>

2. Promote and improve human health and well-being through a healthy lifestyle, access to healthcare and recreation opportunities and a clean and healthy environment	There is access to amenity and recreational open space near the site, and public rights of way nearby. <b>The development will provide the necessary pedestrian and cyclist infrastructure within the site to encourage residents to walk and cycle, with 2m wide footways included on one or both sides of the carriageways and, where appropriate, shared use private drives, prioritising the needs of pedestrians and cyclists over that of vehicles.</b>
3. Improve education opportunities to enhance the skills and knowledge base	Housing allocations are unlikely to impact upon education opportunities, although they can contribute to education through s106 contributions and support existing facilities nearby.
4. Minimise the need to travel and encourage sustainable modes of transport	The development site is within Templeton, a Service Village, which has good public transport links via a regular bus service.
5. Provide a range of high quality housing including affordable housing to meet local needs	Affordable housing units may be provided or a contribution made towards their provision. <b>An indicative site layout is shown in Appendix 2. This illustrates how a suitable form of residential development could be achieved. The layout shows a scheme of up to 40 plots. A mixture of tenures and detached, semi-detached and link properties would enable a wide mix and choice. Correspondence from Ateb accompanied the earlier candidate site submission. This confirmed an interest in acquiring affordable units, were the site to be released for housing.</b>
6. Build safe, vibrant and cohesive communities which have improved access to key services and facilities	This site is well located for access to services, and will make a positive contribution to this objective. <b>The site is within close proximity to a limited range of local facilities in Templeton. These do include, however, a local primary school and regular bus service, both of which are key sustainability features.</b>
7. Protect and enhance the role of the Welsh language and culture	This allocation is unlikely to impact upon Welsh Language and culture.
8. Provide a range of good quality employment opportunities accessible to all sections of the population	Construction can provide employment, it may also allow opportunities for home working for SMEs.
9. Support a sustainable and diverse local economy	Provision of suitable housing can encourage a diverse home-working sector.

10. Prepare for and reduce the impact of Pembrokeshire's contribution to climate change	Policies on design will ensure development incorporates resource efficient and climate responsive design.
11. Maintain and improve air quality	The allocated site is unlikely to impact on air quality, although there may be some increase in car movement.
12. Minimise the generation of waste and pollution	New development will increase waste products although the County operates a strong recycling policy. Policies will need to ensure that development has no significant adverse impact on the water environment.
13. Encourage the efficient production, use, re-use and recycling of resources	Policies will ensure the sustainability of all aspects of development. Policies which include water conservation, sustainable drainage and design will be incorporated in the LDP.
14. Maintain and protect the quality of inland and coastal water	All proposals will need to ensure that there are no adverse impacts on water quality and ground water quality.
15. Reduce the impacts of flooding and sea level rises	Designs will need to ensure that any drainage infrastructure does not place undue pressure on surface water. TAN 15 Development and Flood Risk addresses the issue of flooding and development. <b>Previous correspondence from Dwr Cymru Welsh Water (submitted with the candidate site) confirms that foul flows from the residential use can be accommodated within the public sewerage system and that no problems are envisaged with Waste Water Treatment Works for the treatment of domestic discharges. With reference to surface flows, it is recommended that an appropriate means of surface water drainage, including SUDs should be considered.</b>
16. Use land efficiently and minimise contamination	Design policies will ensure that the layout, land use and density of development be efficient and appropriate for the location. <b>A Geotechnical and Geo-Environmental Report was submitted with the previous planning application. This confirmed that the site is uncontaminated. Various recommendations were made in the report. In terms of ground conditions there are no known constraints that prevent the development of the site for residential uses.</b>

17. Safeguard soil quality and quantity	The site is estimated to be a mixture of Agricultural Classification 3a and 3b and is a good site in terms of development in the village. <b>Agricultural land quality was not highlighted as an issue in previous planning applications.</b>
18. Maintain, enhance and value biodiversity and promote the resilience of ecosystems	Policies will exist to ensure that the biodiversity resource is protected and enhanced. It is important that existing green boundaries and trees be retained as part of the site design. <b>A Preliminary Ecological Appraisal, carried out by Wildwood Ecology in November 2011 in order to support the Royal Mail planning application, concluded that the site's dominant habitat type was improved grassland. The hedgerows were, however, identified as species rich.</b>
19. Protect and enhance the landscape and geological heritage	Green boundaries and trees be retained as part of the site design. <b>The proposal would not have any significant adverse impact upon the visual amenities of the area for a housing development, particularly as the principle of development has been accepted for larger buildings associated with an employment related development. The development would not form an incursion into the countryside beyond existing development on the opposite side of the A4115.</b>
20. Encourage quality locally distinct design that complements the built heritage	Policies on design will ensure development has regard to local distinctiveness and contributes positively to the local context and is appropriate to the local character.
21. Protect, enhance and value the built heritage and historic environment	Adverse impact on built heritage or historic environment is unlikely

### Consideration of Wider Planning Context

- 3.7 Outline planning permission has been recently granted (February 2024) for the development of a business/industrial park on the parcel of land located directly to the west of the Candidate Site (application ref. 22/1047/PA). Although at present within the adopted LDP, this parcel of land is included within the settlement limit for Templeton, the replacement LDP proposes to amend the settlement boundary (as identified on the Deposit Plan Proposals Map) so as to exclude this parcel of land from within settlement limits.

- 3.8 It is acknowledged that reserved matters consent will need to be secured further to the outline permission granted in February 2024, however, it is the case that once the scheme is built out (in accordance with the extant consent), the development would in planning policy terms be located within 'open countryside' i.e. outside the settlement limits for Templeton as per the draft proposals set out in the Second Deposit.
- 3.9 The resulting pattern of built form in this location would therefore encompass a parcel of built development (as per the business park permission granted in February 2024), adjoining a parcel of undeveloped 'infill' land; which then abuts the new settlement boundary to the east. This represents an illogical positioning of the settlement boundary. This position is demonstrated when comparing the existing/adopted LDP allocation, and the proposed replacement LDP allocation (in the context of the approved business park consent) – **please see overleaf.**



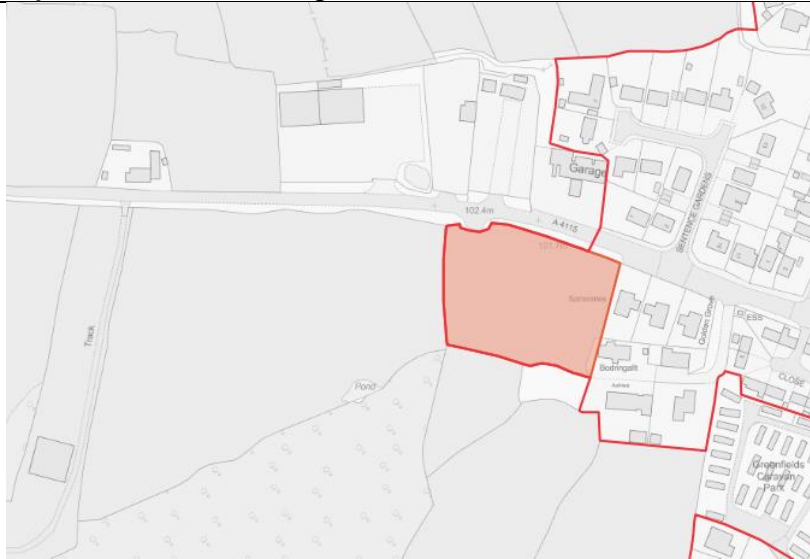
## Current/Adopted LDP – Planning Context



Consented Employment Development

Housing Allocation

## Replacement LDP – Planning Context



Consented Employment Development

Housing Allocation

- 3.10 The illogical positioning of the settlement boundary within the Deposit LDP is shown below utilising the Site Layout for which outline permission (22/1047/PA) has been granted (it is acknowledged that the outline consent extends to the red line only, however, as specified within the application submission, it is the Applicant's intention to develop out a second phase as per the layout plan below). The pink line on the plan illustrates the proposed positioning of the settlement boundary in the Replacement LDP – the defined settlement is identified as falling to the east of this line, (with the approved business park development falling outside the settlement and within open countryside as described above). The business park and what would become an 'infill' parcel adjoining are clearly not within open countryside. It is also the case that the resulting infill parcel of land should be included within the allocation in light of potential highways constraints and so as to avoid the need for an additional access point onto the highway.

### Current Positioning of Settlement Boundary in Second Deposit Plan



### Requested Revised Positioning of Settlement Boundary to Follow Logical Pattern of Built Form



- 3.11 It is therefore considered essential that a settlement boundary review is undertaken as part of the Second Deposit Plan consultation to allow for an appropriate rounding off of the settlement. As such, it is requested that the settlement boundary is logically extended on the LDP Proposals Map (which is taken forward to Examination) to run adjacent to the western extent of the business park so as to follow the pattern of built form, as demonstrated below.

## 4 Tests of Soundness

- 4.1 With reference to the merits of the site as discussed in the previous section, it is evident that the omission of the remainder of the candidate site as a housing land allocation (beyond the 14 units identified for allocation on the 0.61 ha site identified in the Second Deposit Plan) results in questions relating to the soundness of the overall Plan. The three tests of Soundness are discussed below in the context of the site and the proposals involved.

### **Does the Plan Fit? (i.e. is it consistent with other plans?)**

- 4.2 In general terms the Plan is consistent in respect of the proposed allocation for housing and the acceptance that the site is no longer appropriate for employment uses.

### **Is the Plan appropriate? (i.e. is it appropriate for the area in the light of evidence?)**

- 4.3 The Plan is not considered appropriate in the light of evidence which has been provided by Pembrokeshire's Local Housing Market Assessment 2021, which highlights the need to address the large backlog of affordable housing need and the need to achieve a more balanced population profile, alongside the localised need for increased accommodation in the Templeton Community Area over the next 13 years.

### **Will the Plan deliver? (i.e. is it likely to be effective?)**

- 4.5 As a result of the points raised in previous sections of this submission it is considered that the Plan is inconsistent with the Test in that it would deliver less housing than is required in the village of Templeton.
- 4.6 If the site proposed were released for development, provisions would be incorporated which would seek to ensure a high quality of design and layout, including retention and enhancement of peripheral vegetation, with areas of buffer planting also shown in the south-west part of the site. Generous areas of open space/landscaping are also proposed along the site frontage and in the central part of the site. Hence Placemaking Principles would be adhered to. Provision is also made in the layout for self-build plots in order to meet demand in the area.

## 5 Conclusion

- 5.1 This site representation has been prepared in response to the Public Consultation on the Pembrokeshire LDP 2 Second Deposit Plan (draft version published September 2024), and is made by Asbri Planning Limited on behalf of Idris Davies Ltd. The representation requests that in addition to the proposed allocation of 0.61 hectares of the site (for 14 units), the wider site is incorporated in the proposed housing land allocation HSG/132/LDP2/1 West of Kings Park Farm/south of the A4115, Templeton.
- 5.2 The allocation of 0.61 hectares of land for 14 dwellings on part of the candidate site (HSG/132/LDP2/1) within the Second Deposit Plan is welcomed in terms of the Council's acceptance of the principle of housing and its acknowledgement that the adopted LDP employment allocation is no longer appropriate. However, it is disappointing that the Deposit Plan has not allocated a larger area for residential uses. This is in spite of the principle of development having previously been accepted on the wider area which is now proposed as open countryside.
- 5.3 Consequently representations are submitted on this basis and objections are made to Policy GN14 Residential Allocations, Policy SP6 – Settlement Boundaries and the Proposals Map Inset for Templeton as the Plan fails to meet the prescribed Test of Soundness 2.
- 5.4 It has been demonstrated that the site could potentially deliver some 40 dwellings of various types and sizes, thereby providing a contribution to the area's housing land supply requirements as well as affordable housing. This would be compatible with the most up to date Local Housing Market Assessment which identifies the need to address the large backlog of affordable housing need, alongside the need to achieve a more balanced population profile. The site presents a deliverable and viable housing allocation in a highly sustainable location adjacent to the existing settlement –an extended allocation is therefore entirely logical.
- 5.5 Within the First Deposit Plan, two sites were proposed to be allocated in Templeton, which amounted to a total of 40 dwellings (including the 12 proposed units on the part of the submission site). However, the second allocation (HSG/132/LDP/01) has been removed from the Second Deposit (as a scheme has been built out on the land in the intervening period). As such, only 14 units are now proposed for allocation in Templeton. Based on the housing need of 43 dwellings identified for the settlement of Templeton within the most recent Local Housing Market Assessment, the settlement is subject to a shortfall of 29 dwellings. We therefore believe the subject site is capable of addressing the forthcoming need up to 2033.
- 5.6 This submission provides a revised SA Assessment which demonstrates that an extended housing proposal at this location would continue to meet the LDP2 objectives identified by the Council.
- 5.7 In light of the above, it is, therefore concluded that:
- A settlement boundary review is necessary as part of the Second Deposit Plan consultation to allow for an appropriate rounding off of the settlement of Templeton. As such, it is requested that the settlement boundary is logically extended on the LDP Proposals Map (which is taken forward to Examination) to run adjacent to the western extent of the consented business park so as to follow the pattern of built form at the western extent of the settlement.
  - The designated housing allocation (HSG/132/LDP2/1) should be reasonably and logically extended to include the adjacent (western) parcel of land, and the extended allocation should be identified on the Proposals Map accordingly.

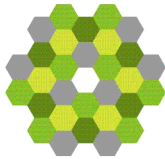
# Appendix 1

## Site Location

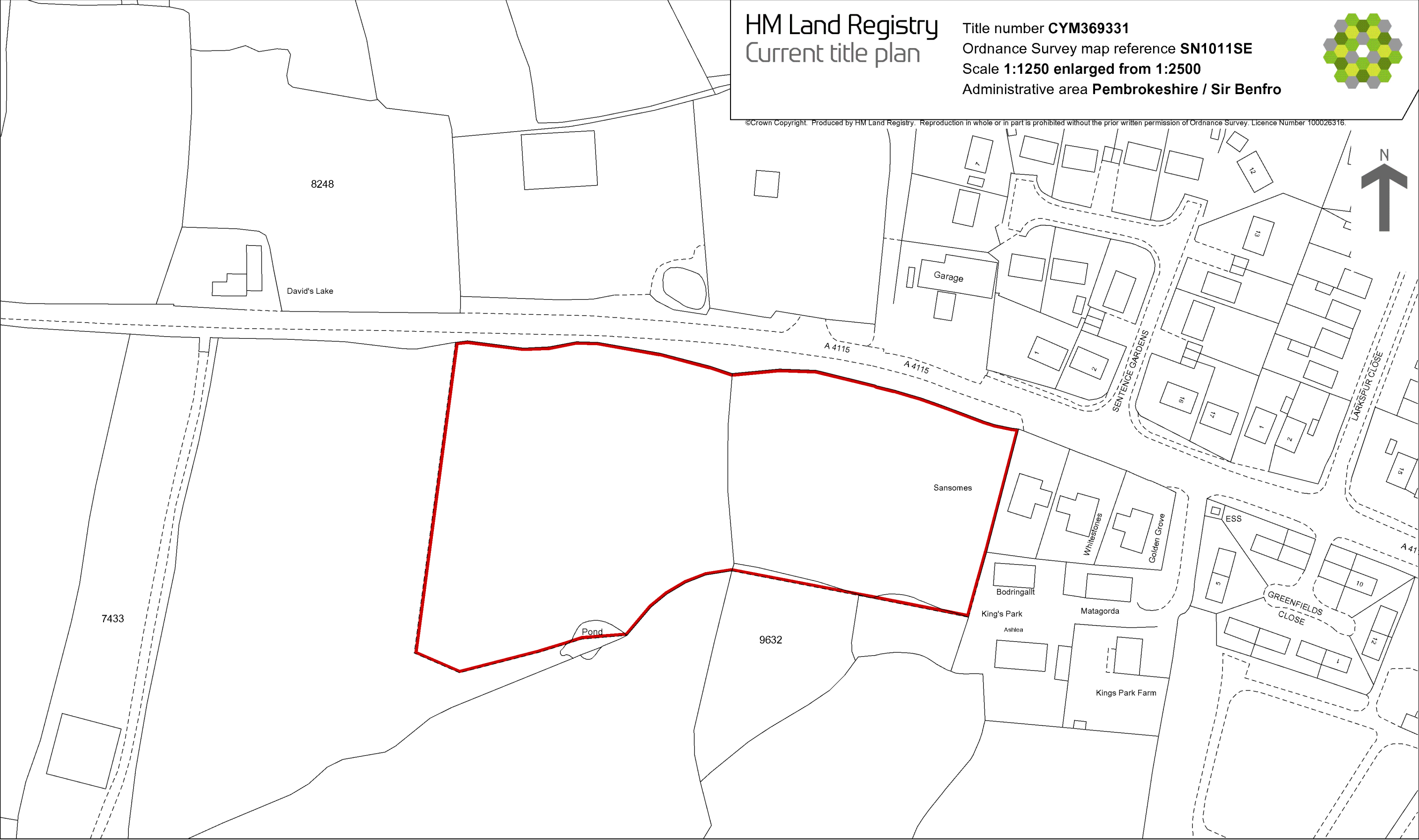


HM Land Registry  
Current title plan

Title number **CYM369331**  
Ordnance Survey map reference **SN1011SE**  
Scale **1:1250 enlarged from 1:2500**  
Administrative area **Pembrokeshire / Sir Benfro**



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## Appendix 2

### **Indicative Site Layout**





- Self-build Plots
- Affordable Housing



Site	Templeton
Dwg Name	Illustrative Masterplan
Client	Idris Davies
Date	13.05.2018
Rev	C
Scale	N.T.S