## Nettleship, Tom

**From:** [redacted]
**Sent:** 16 December 2024 17:23
**To:** LDP - For Enquiries
**Cc:** Jon Hurley
**Subject:** Deposit Plan Representation - Site allocation S/HSG/034F/LDP2/1 Maesgwynne, Fishguard
**Attachments:** GN 16 Deposit Plan 2 Comments Form 2024.pdf; GN 19A Deposit Plan 2 Comments Form 2024.pdf; Consultation Response Deposit Plan - Maesgwyn Phase 2 Covering Letter.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 (Wales & West Housing Association) specifically in regard to the Deposit Plan allocation S/HSG/034F/LDP2/1 Maesgwynne, Fishguard.

The following documents are attached:

- Deposit Plan Representations (Asbri Planning, December 2024)
- Deposit Plan Form – GN 19A
- Deposit Plan Form – GN 16

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.

Kind regards,

**Oliver Hanney – Senior Planner**

[redacted]

asbriplanning

**Swansea | Cardiff**

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***Cynllun Datblygu Lleol 2 Cyngor Sir Penfro (Medi 2024)***
***Ffurflen Sylwadau Cam Adneuo'r Cynllun Datblygu Lleol 2***

**Pembrokeshire County Council**
**Local Development Plan 2 (Sept 2024)**
**Deposit LDP 2 Representations Form**

*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 Adneau 2020 yn cael eu symud ymlaen ac mae angen gwneud sylwadau newydd ar y Cynllun Adneau 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, Hwlffordd, 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 | | Oliver Hanney |
| *Teitl swydd (lle y bo'n berthnasol)* Job title (where relevant) | | Senior Planner |
| *Sefydliad (lle y bo'n berthnasol*) Organisation (where relevant) | Wales & West Housing Association | Asbri Planning Limited |
| *Cyfeiriad* Address | C/O Agent | [redacted] |
| *Rhif ffôn* Telephone no | C/O Agent | |
| E-bost Email address | C/O Agent | |
| *Llofnodwyd (gallwch teipio)* Signed (can be typed) | O.HANNEY | |

| | |
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| *Dyddiad*<br>Date | 16/12/2024 |
| ***RHAN B: Eich sylw***<br>**PART B: Your representation** | |
| *Eich enw / sefydliad*<br>Your name / organisation | Oliver Hanney – Asbri Planning Limited |
| ***1. Ar ba ran/rannau o'r Cynllun (neu ddogfennau ategol) rydych yn rhoi sylwadau?***<br>**1. Which part(s) of the Plan (or supporting documents) are you commenting on?** | |
| *Rhif(au) polisi Cynllun Datblygu Lleol neu ddyraniad safle*<br>LDP policy or site allocation number(s) | Policy GN 16 Residential Allocations, specifically concerning site S/HSG/034F/LDP2/1 Maesgwynne, Fishguard |
| *Rhif(au) paragraff y Cynllun Datblygu Lleol neu adran*<br>LDP paragraph or section number(s) | |
| *Cyfeiriad(au) Map Cynigion y Cynllun Datblygu Lleol*<br>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.*<br>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.***<br>*I gael rhagor o wybodaeth am gadernid a gofynion gweithdrefnol, gweler y nodiadau cyfarwyddyd.*<br>**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.**<br>*For more information on soundness and procedural requirements, see the guidance notes.* | |
| *Rwyf o'r farn bod y CDLl yn gadarn ac yn bodloni gofynion gweithdrefnol.*<br>I think the LDP is sound and meets procedural requirements. | No |
| *Rwyf o'r farn nad yw'r CDLl yn gadarn ac y dylid ei newid.*<br>I think the LDP is unsound and should be changed. | Yes (please refer to Supporting Statement |

| | |
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| | for full details) |
| *Rwy'n credu na chafodd y gofynion gweithdrefnol eu bodloni.*<br>I think that the procedural requirements have not been met. | No |
| ***3. A hoffech i'r Cynllun gynnwys polisi, dyraniad safle neu paragraff <u>newydd</u>?***<br>*Ticiwch <u>bob un</u> sy'n berthnasol.*<br>**3. Would you like the LDP to include a <u>new</u> policy, site allocation or paragraph?**<br>Tick <u>all</u> that apply. | |
| *Dyraniad safle newydd*<br>New site allocation | No |
| *Polisi newydd*<br>New policy | Yes |
| *Paragraff neu destun ategol newydd*<br>New paragraph or supporting text | No |
| ***4. Os ydych am ychwanegu dyraniad safle newydd, a wnaethoch gyflwyno'r safle yn flaenorol fel y safle cais? Os felly, a fyddech cystal â rhoi enw a chyfeiriad y safle cais (os yw'n hysbys).***<br>**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*<br>Site name | |
| *Cyfeiriad y cais*<br>Site reference | |
| *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.*<br>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.

Please refer to enclosed supporting statement.

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| *Ticiwch yma os ydych chi'n cyflwyno deunydd ychwanegol i gefnogi eich sylw.*<br>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 gwrandawiad 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 gwrandawiad' 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 gwrandawiad. 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.

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| *Nid wyf am siarad mewn sesiwn gwrandawiad ac rwyf yn fodlon i'm sylwadau ysgrifenedig gael eu hystyried gan yr Arolygydd.*<br>I do not want to speak at a public hearing and am happy for my written representations to be considered by the Inspector. | |

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| *Rwyf am siarad mewn sesiwn gwrandawiad.*<br>I want to speak at a public hearing. | x |

*Os ydych chi eisiau cyfranogi mewn gwrandawiad, 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').

**Policy GN 16 Residential Allocations specifically concerning site S/HSG/034F/LDP2/1 Maesgwynne, Fishguard**

***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.**

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| *Rwy'n dymuno cael fy nghlywed yn Gymraeg.*<br>I wish to be heard in Welsh. | |
| *Rwy'n dymuno cael fy nghlywed yn Saesneg.*<br>I wish to be heard in English. | 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/brofion 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 gwrandawiad 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.

***Cynllun Datblygu Lleol 2 Cyngor Sir Penfro (Medi 2024)***
***Ffurflen Sylwadau Cam Adneuo'r Cynllun Datblygu Lleol 2***

**Pembrokeshire County Council**
**Local Development Plan 2 (Sept 2024)**
**Deposit LDP 2 Representations Form**

*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 Adneau 2020 yn cael eu symud ymlaen ac mae angen gwneud sylwadau newydd ar y Cynllun Adneau 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, Hwlffordd, 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 | | Oliver Hanney |
| *Teitl swydd (lle y bo'n berthnasol)* Job title (where relevant) | | Senior Planner |
| *Sefydliad (lle y bo'n berthnasol*) Organisation (where relevant) | Wales & West Housing Association | Asbri Planning Limited |
| *Cyfeiriad* Address | C/O Agent | [redacted] |
| *Rhif ffôn* Telephone no | C/O Agent | |
| E-bost Email address | C/O Agent | |
| *Llofnodwyd (gallwch teipio)* Signed (can be typed) | O.HANNEY | |

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| *Dyddiad*<br>Date | 16/12/2024 |

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|---|---|
| ***RHAN B: Eich sylw***<br>**PART B: Your representation** | |
| *Eich enw / sefydliad*<br>Your name / organisation | Oliver Hanney – Asbri Planning Limited |

| | |
|---|---|
| ***1. Ar ba ran/rannau o'r Cynllun (neu ddogfennau ategol) rydych yn rhoi sylwadau?***<br>**1. Which part(s) of the Plan (or supporting documents) are you commenting on?** | |
| *Rhif(au) polisi Cynllun Datblygu Lleol neu ddyraniad safle*<br>LDP policy or site allocation number(s) | **Policy GN 19A Maesgwynne, Fishguard S/HSG/034F/LDP2/1** |
| *Rhif(au) paragraff y Cynllun Datblygu Lleol neu adran*<br>LDP paragraph or section number(s) | |
| *Cyfeiriad(au) Map Cynigion y Cynllun Datblygu Lleol*<br>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.*<br>If your representation relates to a supporting document (e.g. the Sustainability Appraisal), insert the name(s) and reference(s) here. | |

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| ***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.***<br>*I gael rhagor o wybodaeth am gadernid a gofynion gweithdrefnol, gweler y nodiadau cyfarwyddyd.*<br>**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.**<br>*For more information on soundness and procedural requirements, see the guidance notes.* | |
| *Rwyf o'r farn bod y CDLl yn gadarn ac yn bodloni gofynion gweithdrefnol.*<br>I think the LDP is sound and meets procedural requirements. | No |
| *Rwyf o'r farn nad yw'r CDLl yn gadarn ac y dylid ei newid.*<br>I think the LDP is unsound and should be changed. | Yes (please refer to Supporting Statement for full details) |

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| *Rwy'n credu na chafodd y gofynion gweithdrefnol eu bodloni.*<br>I think that the procedural requirements have not been met. | No |

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| ***3. A hoffech i'r Cynllun gynnwys polisi, dyraniad safle neu paragraff <u>newydd</u>?***<br>*Ticiwch <u>bob un</u> sy'n berthnasol.*<br>**3. Would you like the LDP to include a <u>new</u> policy, site allocation or paragraph?**<br>Tick <u>all</u> that apply. | |
| *Dyraniad safle newydd*<br>New site allocation | No |
| *Polisi newydd*<br>New policy | Yes |
| *Paragraff neu destun ategol newydd*<br>New paragraph or supporting text | Yes |

| | |
|---|---|
| ***4. Os ydych am ychwanegu dyraniad safle newydd, a wnaethoch gyflwyno'r safle yn flaenorol fel y safle cais? Os felly, a fyddech cystal â rhoi enw a chyfeiriad y safle cais (os yw'n hysbys).***<br>**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*<br>Site name | |
| *Cyfeiriad y cais*<br>Site reference | |

*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.

Please refer to enclosed supporting statement.

| | |
|---|---|
| *Ticiwch yma os ydych chi'n cyflwyno deunydd ychwanegol i gefnogi eich sylw.*<br>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 gwrandawiad 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 gwrandawiad' 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 gwrandawiad. 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 gwrandawiad ac rwyf yn fodlon i'm sylwadau ysgrifenedig gael eu hystyried gan yr Arolygydd.*<br>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 gwrandawiad.* | x |

| | |
|---|---|
| I want to speak at a public hearing. | |
| *Os ydych chi eisiau cyfranogi mewn gwrandawiad, nodwch isod am beth rydych chi eisiau siarad (e.e. 'Safle Tai ym Mhen y Graig' neu 'Y targed tai cyffredinol').*<br>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'). | |
| **GN 19A Maesgwynne, Fishguard S/HSG/034F/LDP2/1** | |
| ***9. Os ydych am siarad, byddai'n ddefnyddiol pe gallech nodi ym mha iaith yr hoffech gael eich clywed.***<br>**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.*<br>I wish to be heard in Welsh. | |
| *Rwy'n dymuno cael fy nghlywed yn Saesneg.*<br>I wish to be heard in English. | 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/brofion 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 gwrandawiad 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.

Planning & Development Consultants
Ymghynghorwyr Cynllunio a Datblygu

asbriplanning

[redacted]

Date: 16th December 2024
Our Ref: 22.116

The Development Plans Team,
County Hall,
Freeman's Way,
Haverfordwest,
Pembrokeshire,
SA61 1TP

Dear Sir/Madam,

**Pembrokeshire Replacement Local Development Plan 2017-2033**
**Second Deposit Plan Consultation Representations**
**GN 19A Maesgwynne, Fishguard S/HSG/034F/LDP2/1**

**Introduction & Background**

We write in relation to the current consultation on the Pembrokeshire Replacement Local Development Plan (RLDP) Second Deposit Plan Consultation, on behalf of our Client (Wales & West Housing Association), specifically with regard to Site GN 19A Maesgwynne, Fishguard reference S/HSG/034F/LDP2/1.

As the Authority are aware, a significant amount of work has been undertaken in relation to the above site over the course of the preparation of the Replacement LDP to date. This detailed assessment work has clearly demonstrated that the inclusion of Maesgwynne as a strategic housing allocation fully accords with the RLDP strategy and this is recognised through the site successfully passing through all phases of the candidate site assessment (candidate site reference 335). Furthermore, through the work that they have done to date, it is considered by Wales & West Housing Association that the site is entirely deliverable.

In summary, these representations wish to fully support the Pembrokeshire RLDP Second Deposit Plan, including the allocation of Maesgwynne for a residential allocation under Policy GN 16 'Residential Allocations'. It is reiterated that our Client (Wales & West Housing Association) is fully committed to the delivery of the allocation, in accordance with the policies of the Replacement Plan (both site-specific and plan-wide policies inclusive).

**Policy Objections**

Although the representations provide support for the RLDP Second Deposit as a whole, some detailed matters are raised (and objected to) in relation to specific elements of the proposed policy wording relating to allocation GN 19A Maesgwynne, Fishguard (ref. S/HSG/034F/LDP2/1). The relevant policies which we seek to address as part of these representations are set out below, followed by a response to each policy in turn.

Policy GN 16 Residential Allocations

*The following sites are allocated for residential development:*

**Extract of Policy GN16. Deposit LDP, page 240.**

| LDP2 Reference | Site Name | Settlement | Minimum Units In Plan Period | Indicative Affordable Housing Requirement | | Delivery timescale Year 1-5 (ST) Year 6-10 (MT) Year 11-16 (LT) | Units Beyond The Plan Period | Area Ha | Potential For Self Build Indicated By Site Promoter |
|---|---|---|---|---|---|---|---|---|---|
| | | | | Percentage (%) | Unit Number | | | | |
| S/HSG/034F/LDP2/1 | Maesgwynne (see policy GN 19A) | Fishguard | 175 | 10% | 17 | MT/LT | 167 | 11.39 | No |

Response**:** It is welcomed that the Maesgwynne site is allocated for residential purposes within the RLDP Second Deposit**.** Whilst we are of course generally supportive of the principle of the residential allocation at Maesgwynne, we wish to raise concern regarding the delivery rate of housing units over the plan period. Based upon the minimum units outlined above (175), in the remaining plan period 2025-2033 it is envisaged the allocation would make provision for approximately 22 dwellings per year.

Following discussions with our client, Wales & West Housing Association, we understand that the delivery rate up to 2033 can be increased to 40 dwellings per year. Our client has indicated that they envisage the development of the site can be progressed in a timely manner over the coming years, over achieving against the requirement to deliver 175 units during the plan period. As highlighted above, it is anticipated a minimum of 40 dwellings can be delivered per year (this is based in part on discussions that they have undertaken with contractors as part of their initial assessment work relating to the site). This would result in a minimum delivery in the plan period of 320 units up to 2033.

We therefore request amendments to Policy GN 16 'Residential Allocations' to reflect our client's desire to progress the development of the Maesgwynne allocation in a prompt manner over the remaining plan period (8 years 2025 – 2033). Hence, we request that the 'minimum units in plan period' figure be adjusted to 320 units, which accurately reflects our client's intentions to swiftly progress the build out and construction phases at Maesgwynne. In order to reflect the increased 'minimum units in plan period', the 'units beyond the plan period' figure should be significantly reduced accordingly. On the basis of providing a minimum of between 320 – 360, the 'units beyond the plan period' should be removed from Policy GH 16 site reference S/HSG/034F/LDP2/1, as the whole allocation is anticipated to be deliverable over the remaining plan period.

Policy GN 19A Maesgwynne, Fishguard S/HSG/034F/LDP2/1

*"At Maesgwynne, the part of the site known as Parc Loktudi has been developed, but other parts of the site remain undeveloped. Recently, planning permission has been granted for a 50 home development on land adjacent to Clos-y-Bigney (also known as land North of Maesgwyn), this being a 100% affordable housing proposal being taken forward by the Wales and West Housing Association. A masterplan will be prepared for the remainder of the site, based on further residential development, together with public and amenity open space, sustainable drainage systems (SuDS), a buffer zone adjacent to the Maesgwynne Farm complex, areas protected for their nature conservation value and all matters relating to sustainable access. The size and complexity of the site requires a co-ordinated approach to be taken to its development, with a view to creating a high quality and well-designed scheme which is sensitive to its setting. Vehicular*

*access into the site from the A.40 Trunk Road must accord with the requirements of the Trunk Road Authority. Wales and West Housing Association has commissioned Asbri Planning Ltd to prepare a masterplan for the undeveloped parts of the site, which could form a basis for future planning applications and for LDP 2 Supplementary Planning Guidance following plan adoption".*

The justifying text states at paragraphs 5.111 & 5.112:

*"The Wales and West Housing Association is now the lead organisation seeking to take forward the development of the remaining undeveloped parts of the Maesgwynne site. This site has previously been consented for residential development proposals, which were in part dependent on the creation of a roundabout junction onto the A.40 trunk road (although some discrete elements of the site have been able to move forward without this). The delivery of the remainder of the allocation is dependent upon the development of vehicular access proposals that meet the requirements of the Trunk Road Authority, who have power of direction on this matter at application stage".*

*"Wales and West Housing Association is intending to implement the 50-dwelling affordable housing scheme in accordance with the consent already in place. Subsequent phases of the residential proposal will be masterplanned, will need to incorporate highway access proposals that are supported by the Trunk Road Authority and must make provision for public and amenity open space, SuDS, a buffer zone around the Maesgwynne Farm complex, which includes some Listed Buildings and protection of areas of nature conservation importance, including Maesgwyn Lane and related hedgerows and trees. The proposals must also make provision for sustainable access, including the access from the Trunk Road and site layout in general".*

Response: The detailed supporting information prepared in relation to the Land at Maesgwynne allocation site to date, including the significant masterplanning work which has been undertaken, has demonstrated that a sustainable, high-quality residential-led mixed use scheme which responds sensitively to both local character and landscape setting can be delivered on the site. It is therefore considered that the allocation at Maesgwynne site reference S/HSG/034F/LDP2/1 represents an entirely suitable housing allocation, which has been evidenced as being both viable and deliverable. The principle of allocation Site GN 19 Maesgwynne reference S/HSG/034F/LDP2/1 for residential purposes in the Second Deposit Plan is therefore welcomed and supported.

It is considered that the site is inherently suitable for residential development, as acknowledged by virtue of the site's inclusion as a housing allocation within the Deposit Plan. In regards to site deliverability, it is the case that our Client is looking to commence preparation of a Planning Application for the scheme accordingly, so as to ensure that site can be brought forward for development in line with the timescales set out above. A formal planning application will be submitted to Pembrokeshire County Council to secure permission for the site and enable its development at the earliest opportunity. Further discussions will be held with the Local Authority in this regard.

Whilst the principle of residential allocation is supported, we believe the site could be capable of accommodating an expanded range of uses, including a potential residential care facility within Use Class C2 (residential institution), alongside a health care centre/clinic within Use Class D1 (non-residential institution) – this is based on initial discussions with potentially interested operators for these

facilities. The site's capability to accommodate the proposed residential care scheme and health care centre/clinic has been demonstrated as part of the candidate site submission process. On this basis, we believe the site should be considered as residential led allocation, with the potential ability to accommodate the above uses if they are viable. We therefore object to the wording of Policy GN 19A Maesgwynne, Fishguard S/HSG/034F/LDP2/1. In summary the changes proposed are that the site can be 100% residential scheme, or a residential led development with elements of the above uses outlined.

A proposed, revised policy wording and justification text is provided below. The suggested wording is underlined and highlighted in red.

Proposed Revised Policy Text:

*Policy GN 19A Maesgwynne, Fishguard S/HSG/034F/LDP2/1*
*"At Maesgwynne, the part of the site known as Parc Loktudi has been developed, but other parts of the site remain undeveloped. Recently, planning permission has been granted for a 50 home development on land adjacent to Clos-y-Bigney (also known as land North of Maesgwyn), this being a 100% affordable housing proposal being taken forward by the Wales and West Housing Association. A masterplan will be prepared for the remainder of the site, based on further residential development, potentially with residential care elements and health care centre components of the allocation, together with public and amenity open space, sustainable drainage systems (SuDS), a buffer zone adjacent to the Maesgwynne Farm complex, areas protected for their nature conservation value and all matters relating to sustainable access. The size and complexity of the site requires a co-ordinated approach to be taken to its development, with a view to creating a high quality and well-designed scheme which is sensitive to its setting. Vehicular access into the site from the A.40 Trunk Road must accord with the requirements of the Trunk Road Authority. Wales and West Housing Association has commissioned Asbri Planning Ltd to prepare a masterplan for the undeveloped parts of the site, which could form a basis for future planning applications and for LDP 2 Supplementary Planning Guidance following plan adoption".*

Proposed Revised Justification Text:

*"The Wales and West Housing Association is now the lead organisation seeking to take forward the development of the remaining undeveloped parts of the Maesgwynne site. This site has previously been consented for residential development proposals, which were in part dependent on the creation of a roundabout junction onto the A.40 trunk road (although some discrete elements of the site have been able to move forward without this). The delivery of the remainder of the allocation is dependent upon the development of vehicular access proposals that meet the requirements of the Trunk Road Authority, who have power of direction on this matter at application stage".*

*"Wales and West Housing Association is intending to implement the 50-dwelling affordable housing scheme in accordance with the consent already in place. Subsequent phases of the residential-led proposal will be masterplanned as an entirely residential development, or potentially alongside the residential care elements and health care centre components of the allocation, and will need to incorporate highway access proposals that are supported by the Trunk Road Authority and must make provision for public and amenity open space, SuDS, a buffer zone around the Maesgwynne Farm complex, which includes some Listed Buildings and protection of areas of nature conservation importance, including Maesgwyn Lane and*

*related hedgerows and trees. The proposals must also make provision for sustainable access, including the access from the Trunk Road and site layout in general".*

Policy SP 2 Housing Requirement

***"Provision is made for approximately 6,425 dwellings in the Plan period, to enable delivery of a housing requirement for 5,840 dwellings (365 per year)."***

Response: Whilst the residential allocation under Policy GN 19A Maesgwynne, Fishguard S/HSG/034F/LDP2/1 is supported in principle, we present an objection to Policy SP 2 'Housing Requirement' and the housing requirement of 6,425 dwellings, enabling delivery for 5,840 units (365 per year). As highlighted above, our Client is seeking to improve the deliverability of units during the remaining plan period, from an estimated 22 units per year to 40units per year. As referenced above, this will enable the allocation to be delivered during the plan period and removes the total units to be delivered outside of the plan period. In summary, we believe the housing requirement should reflect our anticipated enhanced delivery of residential units as Maesgwynne.

*Policy SP 3 Affordable Housing Target*

*"The Plan will provide a minimum of 2000 new affordable dwellings (125 per year)."*

Response: Whilst the residential allocation under Policy GN 19A Maesgwynne, Fishguard S/HSG/034F/LDP2/1 is supported in principle, we present an objection to Policy SP 3 'Affordable Housing Target'. As highlighted above, it is anticipated housing delivery at Maesgwynne will be significantly improved upon, providing 40 residential units per year, in comparison to the original delivery of circa 22 residential units per year. Consequently, the quantum of affordable housing could rise as the allocation is brought forward for development at a quicker rate. On this basis, we believe the target for affordable housing could rise in accordance with the anticipated yearly build out rates envisaged at Maesgwynne.

In addition to the Policies identified above, Appendix 3 of the Second Deposit indicates a new site-specific Supplementary Planning Guidance document will be prepared following the adoption of the LDP 2, and will be based on the site masterplan for the undeveloped areas of the allocation.

| | | | | |
|---|---|---|---|---|
| GN 16 GN 19a – Maesgwynne, Fishguard | Maesgwynne Masterplan | N | Y | A Masterplan for the undeveloped parts of the site is to be prepared by Wales and West Housing Association. This may provide a basis for submission of future planning applications and for preparation of SPG post adoption of LDP 2. |

**Extract of Appendix 3: Supplementary Planning Guidance. Deposit LDP, page 240.**

Wales & West Housing Association welcome the ability to comprehensively masterplan the site as referenced in Appendix 3 as part of the LDP and any related SPG process.

**Test of Soundness**

With reference to the merits of the site as discussed in the previous section, it is evident that the objections raised in respect of Policy GN 19A Maesgwynne, Fishguard S/HSG/034F/LDP2/1, Policy GN 16 Residential Allocations, Policy SP 2 Housing Requirement and Policy SP 3 Affordable Housing Target,

results in questions of the soundness of the overall Plan, in so far as they relate only to the minor matters raised as part of this representation, within the context of the in principle support that Wales & West Housing Association have for the allocation. 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?)
Response: In general terms the Plan is consistent in respect of the proposed allocation for housing.

Is the Plan appropriate? (i.e. is it appropriate for the area in the light of evidence?)
Response: The Plan is considered to require a minor adjustment in light of the site promoters desire to significantly improve the delivery of residential dwellings over the course of the remaining plan period. As noted above, our client is eager to bring the allocation forward for development and this will result in improved housing delivery. Additionally, the site is potentially capable of accommodating residential care and health uses. Given the amendments sought to numerous policy texts relating to the Maesgwynne site allocation and housing targets, it is evident that the Plan is requires refinement.

Will the Plan deliver? (i.e. is it likely to be effective?)
Response: As a result of the points raised in previous sections of this submission it is considered that the Plan is requires adjustment with the Test in that the site is capable of increased housing delivery over the Plan period and potentially a broader range of proposed uses (residential care & health).

On this basis, we conclude that the Plan is currently not sound, given the issues raised above.

**Conclusion**
This site representation has been prepared in response to the Public Consultation of the Replacement LDP Second Deposit and is made by Asbri Planning Limited on behalf of Wales & West Housing Association. The representation politely requests that a number of policies pertinent to the residential allocation under Policy GN 19A Maesgwynne, Fishguard S/HSG/034F/LDP2/1 are amended to reflect our comments above.

In summary, the allocation of 11.39 hectares of land for residential purposes on the candidate site (S/HSG/034F/LDP2/1) is broadly welcomed in terms of the Council's acceptance of the principle of residential development. In respect of our first point of objection, the representations highlight how the delivery of residential dwellings during the plan period should be increased, from approximately 20 units per year to between 40 units per year, given our client's intentions to press on with the development of the site in a prompt manner. Consequently, this warrants a revised housing and affordable housing targets.

Our second point of objection relates to our belief that the candidate site is potentially capable of accommodating an expanded range of uses, widening the proposed uses at the candidate site to include residential care uses (Use Class C2) and health centre uses (Use Class D1). Our proposed Policy wording reflects the desire to potentially include care and health uses within the allocation at detailed design stage.

Consequently, representations are submitted on this basis and objections are made to Policy GN 19A Maesgwynne, Fishguard S/HSG/034F/LDP2/1, Policy GN 16 Residential Allocations, Policy SP 2 Housing Requirement and Policy SP 3 Affordable Housing Target. as the Plan needs adjustment to meet the prescribed Test of Soundness 2.

As stated, further to our ongoing discussions with the Authority, we reiterate the Site Promoter's commitment to delivering a sustainable, high-quality residential-led allocation at Maesgwynne in accordance with the policies of the Replacement plan (both site-specific and plan-wide policies inclusive).

We look forward to the RLDP progressing towards examination, and would welcome the opportunity to take part in the relevant Hearing Sessions in relation to Policy GN 19A Maesgwynne, Fishguard S/HSG/034F/LDP2/1, Policy GN 16 Residential Allocations, Policy SP 2 Housing Requirement and Policy SP 3 Affordable Housing Target, and other Hearing Sessions of relevance.

Please do not hesitate to contact me should you require any further detail or wish to discuss any aspect of the representations.

Yours sincerely,

**Oliver Hanney**
Senior Planner
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