

Nettleship, Tom

From: [REDACTED]
Sent: 16 December 2024 17:13
To: LDP - For Enquiries
Cc: Jon Hurley
Subject: Deposit Plan Representation - HSG/088/LDP2/1 West of Bloomfield Gardens and North of Adams Drive & Highfield Park
Attachments: Consultation Response Deposit Plan - Adams Drive, Narbeth Covering Letter.pdf; Deposit Plan 2 Comments Form 2024 - Policy GN 16.pdf; Deposit Plan 2 Comments Form 2024 - Policy SP 2.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 HSG/088/LDP2/1, West of Bloomfield Gardens and North of Adams Drive & Highfield Park.

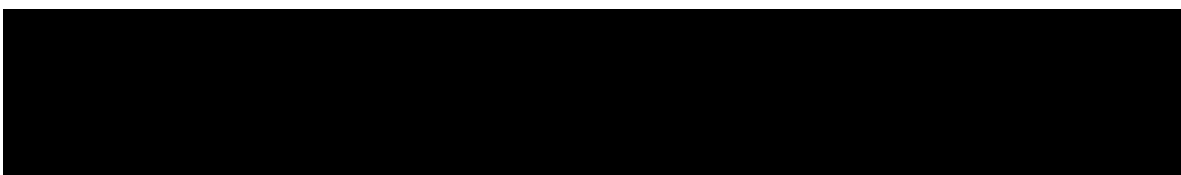
The following documents are attached:

- Deposit Plan Representations (Asbri Planning, December 2024)
- Deposit Plan Form – GN16
- Deposit Plan Form – SP2

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



Swansea | Cardiff



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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 neu
Y Tîm Cynlluniau Datblygu, Neuadd y Sir,
Freeman's Way, Hwlfordd, Sir Benfro, SA61 1TP

We would like your views on the Local Development Plan (LDP) and also on documents which support the LDP. This form should be used for all representations (i.e. comments or objections). Electronic versions and guidance notes are available at <https://www.pembrokeshire.gov.uk/local-development-plan-review/deposit>

Please note: Representations made on the 2020 Deposit Plan will **not** be taken forward and it is necessary to make new representations on this current Deposit Plan.

If you are submitting a paper copy, attach additional sheets as necessary. This form has two parts: Part A (Personal details) and Part B (Your representation). Please note that Part B will be made publicly available and will be forwarded to the Planning Inspectorate.

Your representations must be received by midnight 16 December 2024. Please return forms to: ldp@pembrokeshire.gov.uk or The Development Plans Team, County Hall, Freeman's Way, Haverfordwest, Pembrokeshire SA61 1TP

RHAN A: Manylion cysylltu

PART A: Contact details

Eich manylion/manylion eich cleient
Your / your client's details

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

Enw Name		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	
Rhif ffôn Telephone no	C/O Agent	
E-bost Email address	C/O Agent	
Llofnodwyd (gallwch teipio) Signed (can be typed)	O.HANNEY	

Dyddiad Date	16/12/2024
RHAN B: Eich sylw PART B: Your representation	
Eich enw / sefydliad Your name / organisation	Oliver Hanney – Asbri Planning Limited
1. Ar ba ran/rannau o'r Cynllun (neu ddogfennau ategol) rydych yn rhoi sylwadau? 1. Which part(s) of the Plan (or supporting documents) are you commenting on?	
Rhif(au) polisi Cynllun Datblygu Lleol neu ddyraniad safle LDP policy or site allocation number(s)	Policy SP 2 Housing Requirement
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.	
2. Cyn i chi esbonio eich sylwadau'n fanwl, byddai'n dda gwybod p'un a gredwch fod y Cynllun yn gadarn ai peidio, ac a yw'n bodloni'r gofynion gweithdrefnol. <i>I gael rhagor o wybodaeth am gadernid a gofynion gweithdrefnol, gweler y nodiadau cyfarwyddyd.</i> 2. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements. <i>For more information on soundness and procedural requirements, see the guidance notes.</i>	
Rwyf o'r farn bod y CDLI yn gadarn ac yn bodloni gofynion gweithdrefnol. I think the LDP is sound and meets procedural requirements.	No
Rwyf o'r farn nad yw'r CDLI yn gadarn ac y dylid ei newid. I think the LDP is unsound and should be changed.	Yes (please refer to Supporting Statement for full details)

Rwy'n credu na chafodd y gofynion gweithdrefnol eu bodloni. 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>? Ticiwch <u>bob un</u> sy'n berthnasol. 3. Would you like the LDP to include a <u>new</u> policy, site allocation or paragraph? Tick <u>all</u> that apply.		
Dyraniad safle newydd New site allocation		No
Polisi newydd New policy		Yes
Paragraff neu destun ategol newydd 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 fydddech cystal â rhoi enw a chyfeiriad y safle cais (os yw'n hysbys). 4. If you want to add a new site allocation, have you previously submitted the site as a Candidate Site? If so, please give the Candidate Site name and reference (if known).		
Enw'r safle Site name		
Cyfeiriad y cais 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.

Yes

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

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.

Rwyf am siarad mewn sesiwn gwrandawriad.

X

I want to speak at a public hearing.	
<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 SP 2 Housing Requirement	
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.	
<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.	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.

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.

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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	
Rhif ffôn Telephone no	C/O Agent	
E-bost Email address	C/O Agent	
Llofnodwyd (gallwch teipio) Signed (can be typed)	O.HANNEY	

Dyddiad Date	16/12/2024	
RHAN B: Eich sylw PART B: Your representation		
Eich enw / sefydliad Your name / organisation	Oliver Hanney – Asbri Planning Limited	
1. Ar ba ran/rannau o'r Cynllun (neu ddogfennau ategol) rydych yn rhoi sylwadau? 1. Which part(s) of the Plan (or supporting documents) are you commenting on?		
Rhif(au) polisi Cynllun Datblygu Lleol neu ddyraniad safle LDP policy or site allocation number(s)	Policy GN 16 Residential Allocations, specifically regarding site allocation HSG/088/LDP2/1 West of Bloomfield Gardens and North of Adams Drive & Highfield Park	
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)		
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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. I think the LDP is unsound and should be changed.	Yes (please refer to Supporting	

	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
3. A hoffech i'r Cynllun gynnwys polisi, dyraniad safle neu paragraff <u>newydd</u>? <i>Ticiwch <u>bob un</u> sy'n berthnasol.</i> 3. Would you like the LDP to include a <u>new</u> policy, site allocation or paragraph? Tick <u>all</u> that apply.	
<i>Dyraniad safle newydd</i> New site allocation	No
<i>Polisi newydd</i> New policy	Yes
<i>Paragraff neu destun ategol newydd</i> 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 fydddech cystal â rhoi enw a chyfeiriad y safle cais (os yw'n hysbys). 4. If you want to add a new site allocation, have you previously submitted the site as a Candidate Site? If so, please give the Candidate Site name and reference (if known).	
<i>Enw'r safle</i> Site name	
<i>Cyfeiriad y cais</i> Site reference	
<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> 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/proffion 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.

Yes

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

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 GN 16 Residential Allocations, specifically regarding site allocation HSG/088/LDP2/1 West of Bloomfield Gardens and North of Adams Drive & Highfield Park	
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.	
<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.	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.

Date: 16th December 2024
Our Ref: 22.103

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
HSG/088/LDP2/1 West of Bloomfield Gardens and North of Adams Drive & Highfield Park

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 allocation HSG/088/LDP2/1 West of Bloomfield Gardens and North of Adams Drive & Highfield Park.

As the Authority are aware, a significant amount of supporting information has been prepared in relation to the majority of the above site over the course of the preparation and submission of the planning application for the site currently allocated within the LDP (23/0654/PA and HSG/008/00078 respectively). The planning application was recently reported to Planning Committee on 3 December where it was resolved to grant planning permission subject to the completion of the S106 agreement and NRW confirming that they have no objection to the draft HRA (which is unlikely as we have been in detailed discussions with NRW over the course of the application).

This detailed evidence has clearly demonstrated that the inclusion of HSG/088/LDP2/1 West of Bloomfield Gardens and North of Adams Drive & Highfield Park as a 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 033). Furthermore, the detailed submissions have evidenced that the site is entirely deliverable.

In summary, these representations wish to fully support the Pembrokeshire RLDP Second Deposit Plan, including the allocation of HSG/088/LDP2/1 West of Bloomfield Gardens and North of Adams Drive & Highfield Park for a residential development 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 HSG/088/LDP2/1 West of Bloomfield Gardens and North of Adams Drive & Highfield Park. 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:

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				
HSG/088/LDP2/1	West of Bloomfield Gardens and North of Adams Drive & Highfield Park	Narberth	89	40%	35	MT/LT	64	5.75	Yes

Extract of Policy GN16. Deposit LDP, page 240.

Response: It is welcomed that the subject 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, we wish to raise a limited concern regarding the residential capacity in respect of unit numbers and the minimum number of units to be provided during the plan period. As highlighted above, the Second Deposit indicates allocation HSG/088/LDP2/1 will provide a minimum contribution of 89 residential units over the plan period, with an additional 64 units to be provided beyond the plan period across a site area of 5.75 Ha.

We object to the residential capacity and minimum number of units to be delivered during the plan period. It is pertinent to consider the committed number of units that are to be achieved under planning application 23/0654/PA, which sought residential development, engineering, landscaping, drainage, highways and other associated works at Land to the north of Adams Drive and to the west of Bloomfield Gardens, Narberth, and will be formally granted in early 2025. The site subject to planning application 23/0654/PA, comprises the eastern parcel of land which makes up allocation HSG/088/LDP2/1, in addition to a further field parcel to the east which is not included within the allocation site. Planning Permission 23/0654/PA will deliver 91 residential units and we understand the Applicant, Wales & West Housing Association (also allocation HSG/088/LDP2/1 site promoter) will look to bring forward the development of the site in a prompt manner, following the discharge of the associated pre-commencement planning conditions and execution of the Section 106 Agreement. Wales & West are also in advanced discussions with a contractor over the scheme.

Given the above, and providing planning application 23/0654/PA is built out to its full capacity, it is reasonable to conclude that the western parcel of allocation HSG/088/LDP2/1 is responsible for delivering the remaining 62 residential units that make up the full allocation. The Site Promoter (Wales & West Housing Association) object to the capacity indicated to be delivered during the plan period on this basis. We believe the remaining 62 residential units in the western parcel of allocation

HSG/088/LDP2/1 are capable of being brought forward for development in the plan period (up to 2033). We understand the Site Promoter intends to lodge a planning application in the immediate future, with a view to securing permission for residential development in 2025/2026.

On this basis, we propose that the minimum units to be delivered in the plan period should be increased by 64 units, taking the total to 153 units. Consequently, we propose that the 64 units identified for delivery beyond the plan period should be removed, as the whole allocation is anticipated to be deliverable over the remaining plan period.

Further to the detailed submissions previously made, it is confirmed that the site is viable and deliverable in accordance with the identified delivery timescales.

In addition to concerns related to the allocation capacity, we wish to raise concerns to the affordable housing requirement sought. As noted above, an indicative affordable housing requirement of 40% is proposed. Again, it is pertinent to consider the recently resolved planning application 23/0654/PA. The Committee Report for permission 23/0654/PA indicates affordable housing provision of 25% was sought in accordance with Policy GN.27 of the adopted LDP. However, the approved development makes provision for 28 affordable units – equivalent to a affordable housing contribution of 31%, in excess of the required level of provision. It is also pertinent to consider the approved scheme makes provision for 12 Low Cost Home Ownership units, and whilst it is acknowledged these do not form part of the affordable housing umbrella, in terms of viability they are not open market units. On this basis, we consider that a lower indicative affordable housing level for the proposed allocation could be a more appropriate target and allow flexibility with the tenures and need for grant that would make up this second phase of development, in the context of rising build costs.

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 HSG/088/LDP2/1 West of Bloomfield Gardens and North of Adams Drive & Highfield Park 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. 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 at allocation HSG/088/LDP2/1.

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 housing allocation HSG/088/LDP2/1 West of Bloomfield Gardens and North of Adams Drive & Highfield Park under Policy GN 16 Residential Allocations and Policy SP 2, results in questions of 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?)

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 inappropriate 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. Given the amendments sought to numerous policy texts relating to the site allocation and housing targets, it is evident that the Plan is inappropriate.

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 inconsistent with the Test in that the site is capable of increased housing delivery over the Plan period.

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 HSG/088/LDP2/1 West of Bloomfield Gardens and North of Adams Drive & Highfield Park are amended to reflect our comments above.

In summary, the allocation of 5.75 hectares of land for residential purposes at site HSG/088/LDP2/1 West of Bloomfield Gardens and North of Adams Drive & Highfield Park 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, 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.

Consequently, representations are submitted on this basis and objections are made to Policy GN 16 Residential Allocations and Policy SP 2 Housing Requirement. as the Plan fails 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 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 16 Residential Allocations, Policy SP 2 Housing Requirement and Policy SP 3 Affordable Housing Target.

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

Asbri Planning Ltd