



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 | Mr M Clark | Jason Evans |
| Teitl swydd (lle y bo'n berthnasol) Job title (where relevant) | | |
| Sefydliad (lle y bo'n berthnasol) Organisation (where relevant) | | |
| Cyfeiriad Address | c/o Agent | |
| Rhif ffôn Telephone no | | |
| E-bost Email address | | |
| Llofnodwyd (gallwch teipio) Signed (can be typed) | | |
| Dyddiad | 04/12/2024 | |



| | | |
|--|---|--|
| Date | | |
| RHAN B: Eich sylw | | |
| PART B: Your representation | | |
| Eich enw / sefydliad Your name / organisation | Mike Clark c/o Evans Banks Planning Ltd | |
| 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) | SP7 – Settlement Boundaries | |
| 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. | | |
| Rwyf o'r farn nad yw'r CDLI yn gadarn ac y dylid ei newid. I think the LDP is unsound and should be changed. | X | |
| Rwy'n credu na chafodd y gofynion gweithdrefnol eu bodloni. I think that the procedural requirements have not been met. | | |
| 3. A hoffech i'r Cynllun gynnwys polisi, dyraniad safle neu paragraff newydd? | | |



Ticiwch bob un sy'n berthnasol.

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

Tick all that apply.

Dyraniad safle newydd

New site allocation

Polisi newydd

New policy

Paragraff neu destun ategol newydd

New paragraph or supporting text

4. Os ydych am ychwanegu dyraniad safle newydd, a wnaethoch gyflwyno'r safle yn flaenorol fel y safle cais? Os felly, a fydddech cystal â rhoi enw a chyfeiriad y safle cais (os yw'n hysbys).

4. If you want to add a new site allocation, have you previously submitted the site as a Candidate Site? If so, please give the Candidate Site name and reference (if known).

Enw'r safle

Site name

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/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 see accompanying Supporting Statement. The exclusion of the site in question from the Settlement Boundaries of Penally is inconsistent with the approach taken with regards to other areas of land within the County. This exclusion and its inconsistency therefore results in the plan being unsound.

Ticiwch yma os ydych chi'n cyflwyno deunydd ychwanegol i gefnogi eich sylw.
Tick here if you are submitting additional material to support your representation.

Please see accompanying Supporting Statement.

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.

I want to speak at a public hearing.

X



Os ydych chi eisiau cyfranogi mewn gwrandawriad, nodwch isod am beth rydych chi eisiau siarad (e.e. 'Safle Tai ym Mhen y Graig' neu 'Y targed tai cyffredinol').

If you want to participate in a hearing, indicate below what you want to speak about (e.g. 'Housing site at Pen y Graig' or 'The overall housing target').

Policy SP7

9. Os ydych am siarad, byddai'n ddefnyddiol pe gallech nodi ym mha iaith yr hoffech gael eich clywed.

9. If you wish to speak, it would be helpful if you could indicate in which language you would like to be heard.

Rwy'n dymuno cael fy nghlywed yn Gymraeg.

I wish to be heard in Welsh.

Rwy'n dymuno cael fy nghlywed yn Saesneg.

I wish to be heard in English.

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.

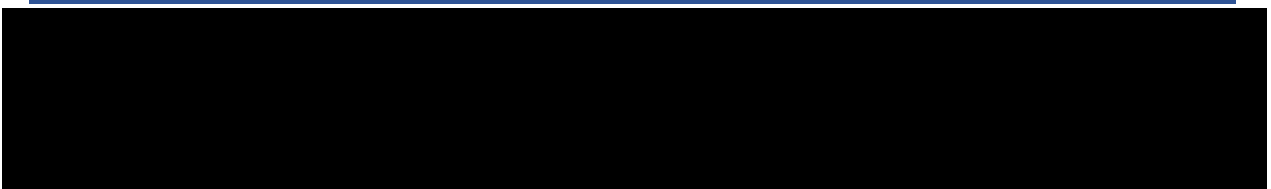


EXTENSION OF SETTLEMENT LIMITS SUPPORTING STATEMENT
FOR
REPLACEMENT PEMBROKESHIRE LOCAL DEVELOPMENT PLAN
2017-2033

LAND ADJACENT TO EDEN HOUSE, PENALLY
(CANDIDATE SITE NO. 389)

on behalf of
Mr M Clark

Our Ref: 1558.c
Date: December 2024
Prepared by: JDE



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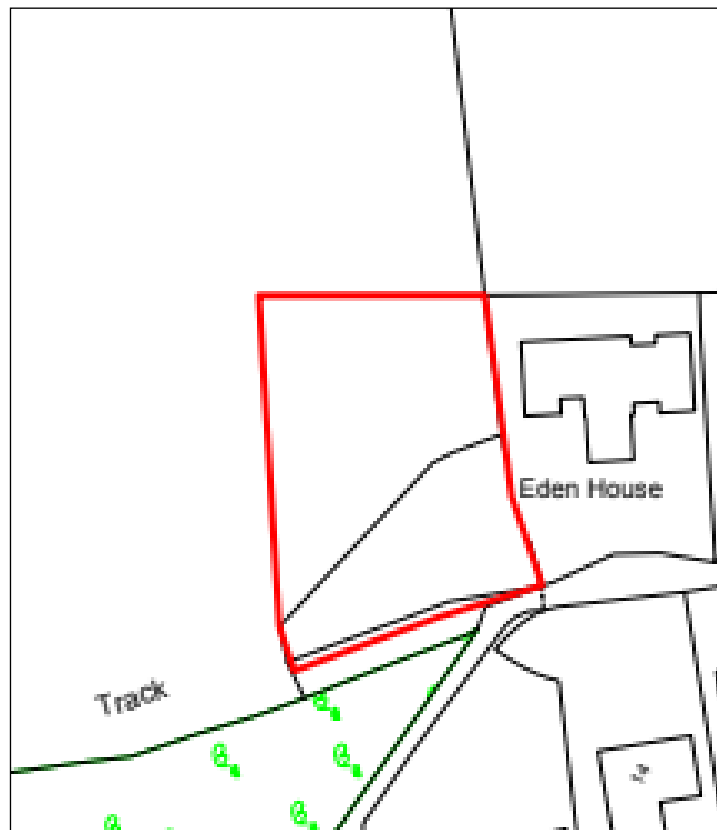
1.0 INTRODUCTION

- 1.1 Evans Banks Planning Ltd. has been instructed by Mr M Clark to prepare and submit a Supporting Statement for the inclusion of land within the defined development limits in the forthcoming replacement *Pembrokeshire Local Development Plan (LDP)* with respect to land adjoining Eden House, Penally).
- 1.2 This statement has been prepared in line with the Authority's published site assessment and selection documents. The contents of this Statement therefore addresses each point raised within these documents as well as ensuring that it complies with regards to the guidance and requirements of *Planning Policy Wales (Edition 12)*.
- 1.3 The contents of this Statement therefore provide a comprehensive case for the inclusion of the land within the development limits, and it should also be read in conjunction with the previously forwarded information and indicative drawing package.

2.0 SITE CONTEXT

2.1 THE SITE AND CURRENT CONTEXT

- 2.1.1 The Site relates to a parcel of land measuring approximately 0.2 acre in area, edged red on the plan and indicated by the red star on the image below.



Plan A



Photograph 1

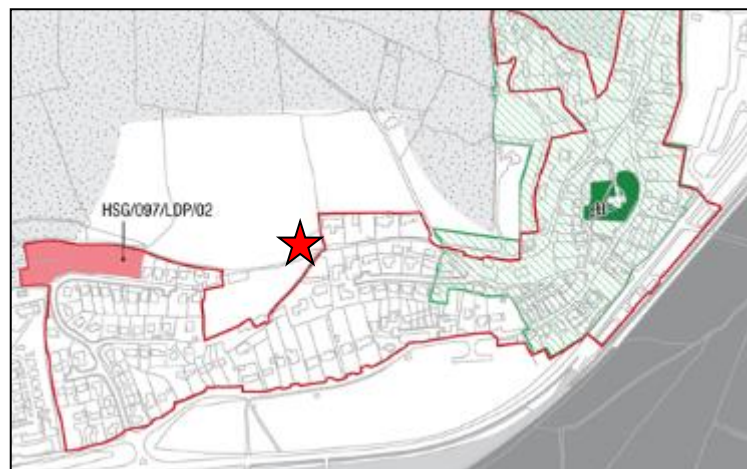
2.1.2 The Site currently consists of the corner element of an existing agricultural field. The site has strongly defined boundaries to the south and east, consisting of hedgerows and mature trees. Its northern and western boundaries are then open onto an existing agricultural field.

2.1.3 Notwithstanding the above, the public highway (Hill Farm Road) runs directly along the southern boundary of the site (Photograph 2), leading to Hill Farm.



Photograph 2

2.1.4 Under the provisions of the current Pembrokeshire LDP, the Site (red star on Plan B) presently lies just to the west of the defined Settlement Limits for Penally, as can be seen in the Proposals Map extract below.



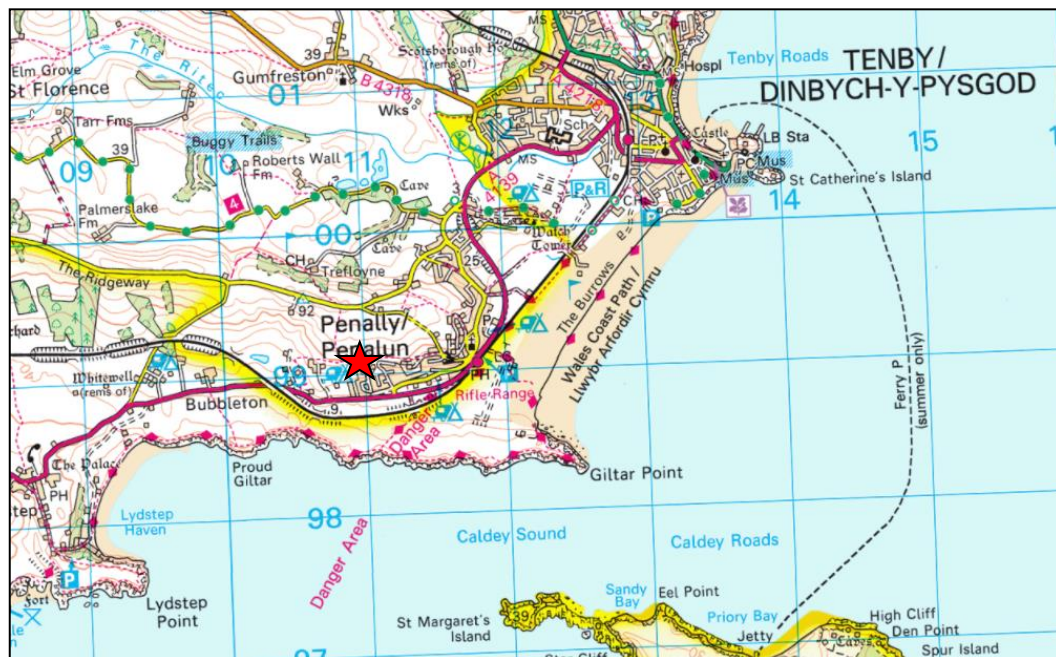
Plan B

2.1.5 Although the Site currently lie's within an 'open countryside' designation, it is clearly adjacent to existing residential properties and closely associated with them in a topographic and setting context. In summary therefore, the Site is well related to the existing defined Settlement Limits for Penally and the actual physical form of the settlement itself, resulting in it representing a natural and logical location for the settlement's minor expansion.

2.2 THE ADJOINING SETTLEMENT

2.2.1 As detailed above and illustrated by Photograph 1, the Site adjoins and is largely well related to the existing built form of the settlement of Penally, with existing residential development located directly to its east and south.

2.2.2 Due to this position and close association with the existing built form, the Site has excellent access to the range of community facilities and local services Penally and the larger settlement of Tenby to its east have to offer (see plan C below).



Plan C

2.2.3 In fact, many of these facilities and services are within walking distance of the Site (in part due to its position adjoining the existing public highway network on the southern boundary of the site – pictured above with the Site marked by a red star), as well as being accessible via regular bus services.

2.2.4 The following table then provides a summary of some of the key facilities and services present nearby, together with their approximate walking distance.

| Facility/Service | Distance from Candidate Site |
|-----------------------|------------------------------|
| Nearest Bus Stop | 200m |
| Penally Train Station | 600m |
| Public House | 225m |
| Community Centre | 200m |

Table 1

2.2.5 The strong sustainable position of the Candidate Site should therefore be given full consideration when considering potential future growth options.

3.0 THE PROPOSAL

3.1 DEVELOPMENT OVERVIEW

- 3.1 It is proposed that the Site be included within the defined development limits for Penally as part of the forthcoming replacement LDP. As detailed above, the originally submitted plan demonstrates that the site is well related to the existing settlement and is an appropriate extension to the development limits.
- 3.2 Although no definitive proposal for the land is put forward at this point in time, it is clear that the site provides an opportunity to facilitate the development of one or two additional dwellings at this location. Both would be served by a shared access point onto Hill Farm Road, where sufficient visibility is present to allow vehicles to enter and leave in safe fashion.
- 3.3 With regards to infrastructure, it is understood that the site is within a sewered area that currently benefits from sufficient capacity to serve the development of the Candidate Site in question. With regards then to surface water, it is considered that as a result of on-site features, there would be a number of options available to any development of the site in terms of its disposal, ensuring its development adheres to current regulatory requirements.

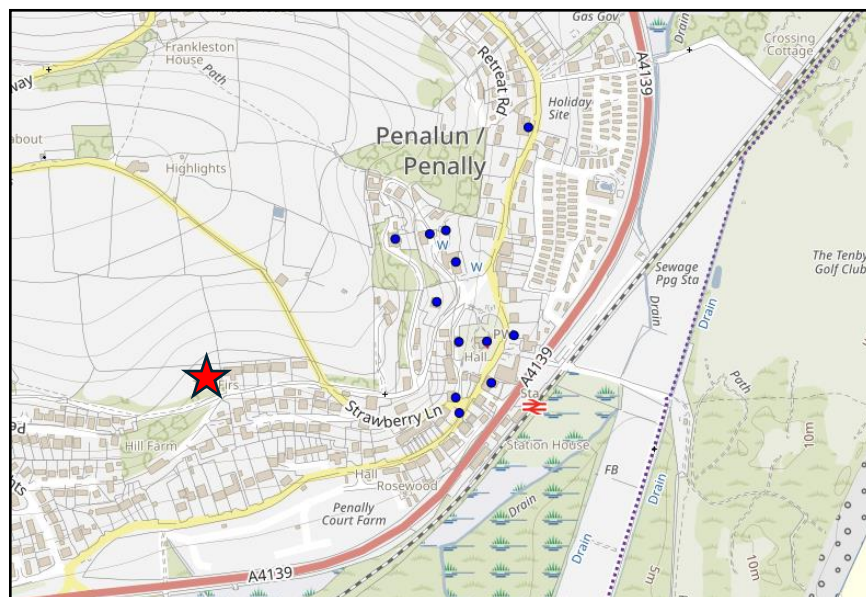
4.0 ENVIRONMENTAL CONSIDERATIONS

4.1 ECOLOGICAL ATTRIBUTES

- 4.1.1 The Candidate Site does not form part of any local or national nature conservation designation. In the wider context, there are no designated sites within 2km of the Site.
- 4.1.2 Notwithstanding the above, any biodiversity assets the Site may include (e.g. trees and hedgerows) have been given full consideration with regards to exploring its potential for development. Whilst the core of the Site does not include any particular habitats of note, it is envisaged that any future development proposal would include the retention and management of existing hedgerow features.

4.2 HISTORICAL ASSETS

- 4.2.1 Neither the Site nor immediately adjoining element of the settlement includes any Listed Buildings or Ancient Monuments, nor does it form part of a designated Conservation Area, as illustrated by the extract below of CADWs records on such interests.



Plan E

- 4.2.2 As a result, the development of the Site would not have any detrimental impact on the setting or interest of any nearby historical asset.

4.3 ENVIRONMENTAL CONSTRAINTS

- 4.3.1 The Site (red star) is not categorised as being at risk of flooding in terms of the Development Advice Maps or those produced by Natural Resources Wales, as illustrated by the plan extract below.



Plan F
(Development Advice Map)



Plan G
(Flood Map for Planning)

4.3.2 Due to its greenfield nature, the Site also has no ground contamination related constraints.

5.0 NATIONAL PLANNING POLICY CONSIDERATIONS

5.0.1 In the preparation of any development plan, consideration must be given to national policy and guidance. At present, this takes the form of *Planning Policy Wales* (PPW) (Edition12) and a series of Technical Advice Notes (TAN) that deal with a range of topic areas.

5.1 HOUSING SUPPLY

5.1.1 With regards to the provision of housing, Paragraph 4.2.2 of PPW gives the following requirements the planning system must fulfil:

- *Identify a supply of land to support the delivery of the housing requirement to meet the differing needs of communities across all tenures;*
- *Enable the provision of a range of well designed, energy efficient, good quality market and affordable housing that will contribute to the creations of sustainable places; and*
- *Focus on the delivery of the identified housing requirement and the related land supply*

5.1.2 In addition to the above, Paragraph 4.2.10 of PPW states “*the supply of land to meet the housing requirement proposed in a development plan must be deliverable*”. To date, the LPA has failed to accomplish this requirement under the provisions of the current LDP.

5.1.3 In order therefore to re-dress this deficiency in provision, and provide a more robust approach to housing provision through a mixed site-scale approach, there is an urgent need to identify alternative deliverable sites for a range of housing development forms and scales in the replacement Plan. Based on the accompanying information, it is clear that the Site represents one such example and is it a location that fully adheres to the search sequence set out at Paragraphs 3.43 – 3.45 of PPW in that it represents a greenfield site adjacent to the existing settlement.

6.0 CONCLUSION

- 6.1 Although currently undeveloped, the Site forms a logical rounding off site of the existing settlement, being well related to it and being positioned at a location within the wider landscape to not form a prominent or logical part of the surrounding open countryside.
- 6.2 In addition to the above, the site lies within close proximity and walking distance of the existing community services and local facilities of the settlement it forms part of, as well as those that adjoin it. This will ensure therefore that the Site will make a positive contribution to both national and local sustainable development objectives.
- 6.3 From a wider sense, the Site will also benefit from well served excellent public transport links to the nearby larger settlement of Tenby, together with other locations within and adjoining the areas, further increasing the facilities and services available to future residents of the Site via sustainable transport means.
- 6.4 In tandem to this, the development of the Site will in turn ensure a viable and so deliverable source of future housing for the settlement and Spatial Area in which it lies, which has seen a dangerous level of under supply prior to and since the adoption of the current LDP. The development of the Site will help to redress this imbalance and it is strongly suggested that the Authority closely scrutinises those sites currently allocated in the LDP in terms of their suitability and deliverability if it is to continue to allocate them. National planning policy however would suggest that in view of the uncertainty in relation to their delivery, such sites should not form part of the replacement LDP.
- 6.5 With the Site having no access, ground condition, flood risk, hydrological, ecological, archaeological or land ownership related constraints, its delivery if allocated is assured. Combined therefore with its locational characteristics, the Site in question represents a sustainable location for future development.

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- 6.6 In view of the above and information provided in this Statement, it is respectfully requested that the settlement limits be extended, and the site be included within the defined development limits for the settlement of Penally.