



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)

<i>Enw</i> Name		Joe Ayoubkhani
<i>Teitl swydd (lle y bo'n berthnasol)</i> Job title (where relevant)		Director
<i>Sefydliad (lle y bo'n berthnasol)</i> Organisation (where relevant)	Belton & Son Ltd	Highlight Planning
<i>Cyfeiriad</i> Address		
<i>Rhif ffôn</i> Telephone no		
E-bost Email address		
<i>Llofnodwyd (gallwch teipio)</i> Signed (can be typed)	J Ayoubkhani	
<i>Dyddiad</i> Date	05/12/24	



RHAN B: Eich sylw

PART B: Your representation

Eich enw / sefydliad

Your name / organisation

Joe Ayoubkhani

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)

HSG/049/LDP2/1

Rhif(au) paragraff y Cynllun Datblygu Lleol neu adran
LDP paragraph or section number(s)

Cyfeiriad(au) Map Cynigion y Cynllun Datblygu Lleol
LDP Proposals Map reference(s)

Keeston

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 gael rhagor o wybodaeth am gadernid a gofynion gweithdrefnol, gweler y nodiadau cyfarwyddyd.

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.

For more information on soundness and procedural requirements, see the guidance notes.

Rwyf o'r farn bod y CDLI yn gadarn ac yn bodloni gofynion gweithdrefnol.

I think the LDP is sound and meets procedural requirements.

x

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

Land east of Brookfield Close, Keeston

Cyfeiriad y cais

Site reference

Candidate Site Ref: 316

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.

Site Allocation HSG/049/LDP2/1

The proposed allocation of 27 homes is fully supported. The increased emphasis within PPW (at Paragraph 4.2.14) for LPAs to support Small and Medium-sized enterprises (such as Belton & Son Ltd) lends support for the allocation of the site.

The site is contiguous with the settlement of Keeston and is located to the east of a development comprising 35 dwellings, which formed a housing allocation within the JUDP. The site is not within or near any statutory cultural heritage, landscape or ecological designations. There are no technical constraints on the site that cannot be overcome or would preclude residential development. It comprises a deliverable site according with the PPW requirement for *"the supply of land to meet the housing requirement proposed in a development plan [to] be deliverable"*. The site promoter is committed to progressing an early planning application such that the deliverability of the site can be confirmed prior to the site's allocation.

The design and construction of any new residential development in this location would take into account the characteristics of the environment and preserve them in a manner that maintains or enhances their contribution to the environment, including their wider context.

The proposal for the site will be developed to contribute to the National Sustainable Placemaking Outcomes and Strategic Placemaking Principles through, by example:

- Retaining and enhancing site features, such as the boundary hedgerow;
- Integrating the proposals into the wider GI network;
- Implementing SuDS features which provide recreational, ecological and visual amenity;
- Creating a series of distinctive spaces and streets and maximising the potential for solar orientation;
- Prioritising pedestrians providing connectivity beyond the site;
- Respecting the character and building forms found in the local area;
- Development of the site presents an opportunity to support local community and Welsh language effects through measures such as:
 - Bi-lingual street names and signage;

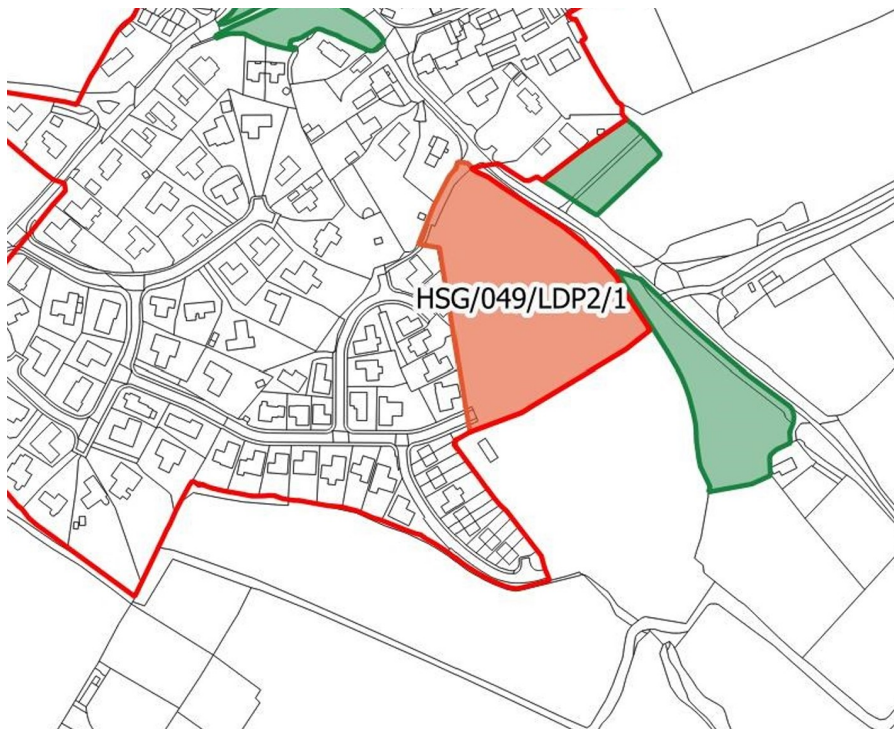


- Local advertisement/marketing of the properties; and
- Delivery of housing to encourage local people to remain within the area – with this not just being about providing homes but places where people want and choose to live with the potential to work locally (and at home) in a vibrant neighbourhood that is set within an attractive environment and fosters community cohesion.
- A range and choice of high quality housing is provided on site. The site promoter is committed to creating a place which will be suitable and attractive for new residents and which will embrace the increasing ability to work flexibly and from home in a way that supports their wellbeing;
- The site proposes housing in a landscape setting with significant multifunctional green space.
- Opportunities for better engagement with the open space will be explored along with the provision of informal open space throughout the site.

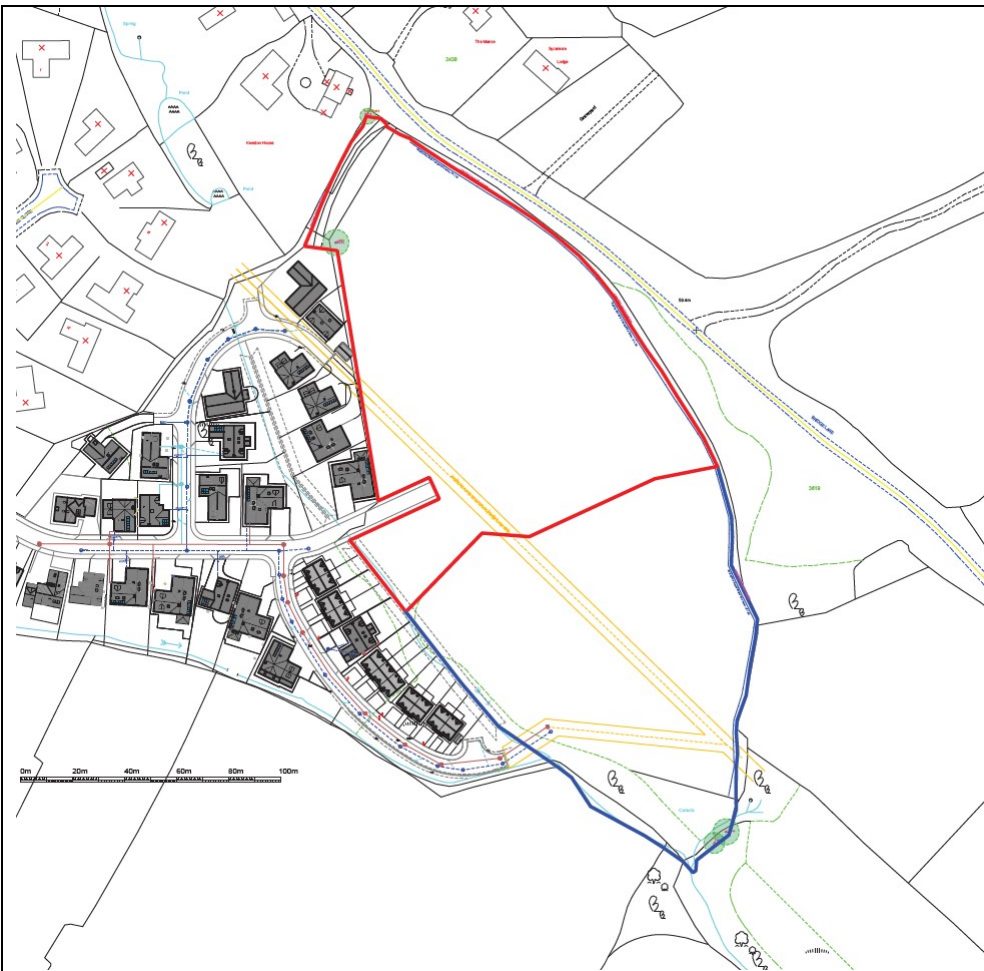
However, important changes need to be made to the allocation to contribute towards the Plan's soundness.

We consider that the land proposed to be allocated, as shown on the Proposals Map (extract below), should be increased further south to enable homes to be built along the access road's southern edge. The land to the south of the access road comprises vacant land that has the appearance of wasteland that is largely overgrown and includes mounds of top soil and an amount of open storage of building materials and equipment. Providing built development on the southern side of the access road would provide a visual screen from this area and better deliver on the placemaking outcomes outlined within PPW.

Proposa



The proposed amended boudnary for the allocation is edged in red below:



The proposed development is considered to best accord with Policy Deposit LDP Policy GN2 criterion 2, which states that development will be permitted where:

"It is appropriate to the local character and landscape/townscape context in terms of layout, scale, form, siting, massing, height, density, mix, detailing, use of materials, landscaping and access arrangements / layout"

Keeston village green includes play equipment and a financial contribution has previously been provided by Belton & Son Ltd to secure ongoing maintenance & enhancement of open space (which can be attributed to the Village Green). The village green is 100m to the north of the proposed pedestrian access the site will provide to Bridge Lane. It is therefore within the walking distances prescribed by the Fields in Trust Guidance for Outdoor Sport and Play.

The Council have prepared an Open Space Assessment Background Paper (December 2019) in support of the LDP2. This shows that there is surplus informal outdoor open space and a slight deficit in formal outdoor open space.

The Green is centrally located in the village and will therefore offer the greatest benefits to existing and proposed residents of Keeston.

We are therefore looking for support of the existing village green in lieu of providing further open space on-site (which would attract additional maintenance and management liabilities).

It should also be noted that in order to maximise benefits associated with the proposed sustainable drainage scheme, an attenuation pond is shown to the south of the site on land within the site



promoter's control.

Candidate Site 316

Notwithstanding our support for the proposed allocation, we consider that the entirety of the parcel (Candidate Site Ref: 316) should be allocated.

As per the land proposed for allocation, the larger candidate site is:

- contiguous with the settlement of Keeston and located adjacent to the east of a development comprising 35 dwellings, which formed a housing allocation within the JUDP;
- not within or near any statutory cultural heritage, landscape or ecological designations. There are no technical constraints on the site that cannot be overcome or would preclude residential development.
- Not of any overriding landscape value comprising vacant land that has the appearance of wasteland that is largely overgrown and includes mounds of top soil and an amount of open storage of building materials and equipment; and
- On land fully within the control of Belton & Son Ltd and inherently deliverable.

The Site Assessment Report (2019) states that the site was screened out (i.e. not progressed as a draft allocation) due to:

- Yellow category for flooding.
- Also, level of growth offered by CS.317 more appropriate for size of settlement.

Taking these in turn:

Yellow category for flooding

The site is not shown as being within an area at risk of flooding in planning policy terms (as set out in the TAN 15 Development Advice Map. The SFCA has been undertaken on a broad-brush basis and whilst the NRW Detailed flood maps show that there is a low-medium risk of surface water flood risk running through the site, any proposal for the site will be the subject of a Drainage Strategy that ensures that the mandatory SuDS requirements are met. Further detailed information on drainage and flood risk can be provided as part of the planning application to demonstrate that flooding is not an unresolvable constraint to the sustainable development of the site.

Level of Growth

Whilst we are fully supportive of the proposed allocation HSG/049/LDP2/1, we consider that the larger candidate site submission (CS.316) is of an appropriate scale and better meets the needs of the settlement of Keeston and the wider market area.

Whilst not a significantly greater number, without the provision of an appropriate level of development at settlements such as Keeston, there exists a risk that issues of affordability would rise in more rural settlements and the viability of existing services would be threatened. New development at scale is required to support the viability of these services. An increase in the older (65+) age groups is estimated within the Demographic Forecasts Paper. New development is required to support younger families moving to the area, and is therefore more likely to support the role of Welsh language and culture within these settlements through appealing to a more youthful population profile than currently exists within villages such as Keeston.

Allocation of the larger site would therefore help maintain diversity and demographic vitality of the settlement and contribute towards the soundness of the LDP2.



Summary

The proposed housing allocation HSG/049/LDP2/1 is supported by Belton & Son Ltd who are a well-established local housebuilder with a longstanding reputation of delivering good quality homes in Pembrokeshire. However, the proposed site allocation boundary should be slightly enlarged to better deliver the placemaking outcomes outlined in PPW, and the larger candidate site (CS.316) should also be allocated as this provides a more appropriate scale of growth at Keeston and is an inherently deliverable site.

Belton and Son Ltd would be happy to engage with the Council to discuss the above representation further. If you have any questions in the meantime, please do not hesitate to contact me.

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.

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').



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.



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